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Planning Design Economics

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LOCAL AUTHORITY REFERENCE: HGY/2005/0007

APPEAL REFERENCE: APP/5420/A/05/1189822

APPEAL SCHEME:

The erection of a concrete batching plant with associated hoppers, conveyors and ancillary facilities

APPEAL SITE:

Ferne Park Depot, Cranford Way,
London, N8 9DG

20 November 2005

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1.0 QUALIFICATIONS AND EXPERIENCE

- 1.1 I am a graduate of Manchester University holding a Bachelor of Arts in Town and Country Planning and a Bachelor of Planning. I also hold a Diploma in Surveying from the College of Estate Management at the University of Reading. I have been a member of the Royal Town Planning Institute since 1989.
- 1.2 I have been an Associate Director of Nathaniel Lichfield & Partners since September 2005. Previously I worked with Lichfield Planning in their London office, with responsibility, inter alia, for off site construction impacts of BAA's Terminal 5 development. Prior to that I worked for the Development Control Departments of three London Boroughs, namely Barnet, Harrow and Hillingdon, as well as Hillingdon's Major Projects Team.
- 1.3 I have had experience of co-ordinating and overseeing the construction impacts of major applications both for local authorities and the private sector. Two of the major applications, British Airway's Headquarters at Waterside (and associated new park at Harmondsworth Moor) and BAA's Terminal 5 project, both included concrete batching plants as part of the development.
- 1.4 Due to the pressure of the workload on the Head of Development Control West, Nathaniel Lichfield & Partners were requested by the London Borough of Haringey to represent them at the Public Inquiry.

2.0 INTRODUCTION AND SCOPE OF EVIDENCE

The Appeal Proposal

- 2.1 My evidence has been prepared on behalf of the London Borough of Haringey, in response to an appeal lodged by London Concrete Ltd against the non-determination of a planning application for:

“The erection of a concrete batching plant with associated hoppers, conveyors and ancillary facilities” (LPA Application Reference: HGY/2005/0007)

- 2.2 A more detailed description of the development is contained within the Statement of Common Ground (SoCG).
- 2.3 The application was submitted on 2 December 2004 with amendments received on 27 June 2005. The application was advertised in the local newspaper on 14 January 2005, with 806 local residents and businesses consulted on the original submission and 600 consulted on the revisions (the reduced number being those closest to the site and those that had responded to the original consultation). A public meeting was held on 14 September 2005, with over 200 people attending.

Environmental Impact Assessment

- 2.4 An Environmental Impact Assessment (EIA) was not submitted with the planning application that is the subject of this appeal. The need for an EIA on the first application was screened with the Government Office for London (GoL).
- 2.5 GoL provided their response on 28 April 2004, indicating that the proposal “falls within the description at paragraph 10(a) of Schedule 2 to the 1999 Regulations and exceeds the threshold in column 2 of the table in Schedule 2 to the 1999 Regulations. Therefore, the Secretary of State considers your clients’ proposal to be ‘Schedule 2 development’ within the meaning of the 1999 Regulations.” However, GoL indicated that for the purposes of the screening direction only, the Secretary of State (SoS) considered that the proposal would not be likely to “have significant effects on the environment by virtue of factors such as its nature, size or location”, consequently the SoS directed that the proposal was not ‘EIA development’.

Scope of Evidence

- 2.6 If London Concrete Ltd had not appealed against the non-determination of the planning application, the Planning Applications Sub-Committee of the London Borough of Haringey had resolved to refuse the application at its meeting of 10 October 2005. The proposed reasons for refusal were:
1. Whilst aggregates would be brought to the site by rail, deliveries of cement to the site, and distribution of concrete from the site, would generate at least 56 lorry movements during the working day which would access the site from and exit on to Tottenham Lane via Cranford Way. Although this additional traffic may not place excessive strain on the capacity of the road network as a whole in this part of Haringey, it would result in disturbance to residents in nearby roads, in particular Tottenham Lane and Church Lane, to a degree which would unacceptably detract from the amenity of those residents. The proposal would thus be contrary to policies EMP 3.1 "Amenity, design and transport considerations", RIM 3.2 "Pollution and nuisance from new development", and DES 1.9 "Privacy and amenity of neighbours" of the Council's adopted 1998 Unitary Development Plan, and to policy UD 2 "General principles" of the Council's 2004 draft Unitary Development Plan.
 2. The additional traffic movements to and from the application site, and the nature of that traffic, would by reason of noise and dust generation be detrimental to the current operating and working conditions of properties in Cranford Way, which are of predominantly of a storage/light industrial character, rather than general industrial. The proposed development would discourage businesses from locating in Cranford Way and may lead to some occupiers moving out of their existing premises. This would lead to a net reduction of jobs in the Defined Employment Area which would not be offset by the proposed creation of 12 jobs at the new plant. The scheme would therefore be contrary to policies EMP 3.1 "Amenity, design and transport considerations", RIM 3.2 "Pollution and nuisance from new development", and DES 1.9 "Privacy and amenity of neighbours" of the Council's adopted 1998 Unitary Development Plan, and policies EMP 5 "Promoting employment uses" and UD 2 "general principles" of the Council's draft Unitary Development Plan.
 3. The applicants have not adequately demonstrated that the proposal will not be harmful to the amenity of nearby residents by reason of noise nuisance. In particular, the Council is not satisfied that the rejection of BS 4142 is justified, and that the applicants have used the correct methodology for assessing the noise impacts of the scheme. As such, the proposal would be contrary to Policy RIM 3.2 "Pollution and Nuisance from New Development" of the Adopted Haringey Unitary Development Plan 1998, and Policy UD2 of the Revised Unitary Development Plan 2004.
- 2.7 The SoCG includes reference to relevant planning policy, though I expand on this in Section 3 with reference to the key planning policy issues.
- 2.8 My evidence will deal with the first two reasons for refusal, the third reason being considered in the proof of evidence from Dani Fiumicelli of Capita Symonds. In

section 4 I will consider the second reason for refusal relating to employment issues. My evidence will demonstrate that there will be a net loss of employment from this Defined Employment Area (DEA) as a result of the proposal.

2.9 In Section 5 of this proof, I will consider the first reason for refusal, relating to the detrimental impact upon the amenities of adjoining occupiers. My evidence will demonstrate that there is a perceived risk associated with the movement of heavy goods vehicles, with implications for the occupiers of residential properties in surrounding roads.

2.10 My summary and conclusions are contained in Section 6.

Other Witnesses and Scope of their Evidence

Dani Fiumicelli, Capita Symonds

2.11 Dani Fiumicelli is Principal Acoustic Consultant at Capita Symonds. His evidence will demonstrate that:

- the approach adopted by London Concrete's noise consultant was not the most appropriate for determining noise from industrial developments;
- the methodology chosen was inappropriate; and
- the assessment of noise associated with the proposed development did not consider all potential noise sources or their impact upon sensitive receptors.

2.12 The evidence will conclude that in its present form the proposed development would have more significant adverse impacts than indicated by the appellants, and that the proposal would unacceptably affect the amenities of adjoining residential occupiers.

3.0 KEY PLANNING POLICY ISSUES

Introduction

- 3.1 Of the three reasons for refusal proposed by the Planning Applications Sub-Committee, two relate to amenity (noise, dust and traffic generation), whilst a third relates to employment. The policies supporting these proposed reasons for refusal are found in chapters in the Unitary Development Plan (UDP) in chapters relating to; employment: the built environment; and resources, implementation and monitoring. The national, regional and local policy background is set out below under these headings.

Employment

National Policy

- 3.2 The Government's national policies on different aspects of land use planning in England are set out in Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs). Key aims and objectives in relation to employment from some of these documents are summarised below:
- Achieving sustainable development through the maintenance of high and stable levels of economic growth and employment (PPS1 paragraph 4);
 - Encouraging economic development in a way which is compatible with the Government's environmental objectives (PPG4 paragraph 1);
 - Using the development plan system to balance the importance of industrial/commercial activity with that of maintaining and improving environmental quality (PPG4 paragraph 2);
 - Development plans should preserve the flexibility of the Town and Country Planning (Use Classes) Order 1987 which introduced a clear distinction between class B1 (business use) – appropriate in residential locations – and class B2 (general industry) – which may be detrimental to amenity (PPG4 paragraph 7);

- The Local Planning Authority (LPA) should review employment land provision to determine whether sites are surplus to requirements and could be released for housing (PPG3 [Draft Consultation 2003] paragraph 33); and
- the planning system plays a key role in protecting and improving the natural environment, public health and safety and amenity (PPS23 paragraph 15).

Regional Policy

3.3 The Mayor's Spatial Development Strategy (the London Plan) was adopted in February 2004. Two other regional documents of relevance are, the Mayor's Draft Strategic Planning Guidance (SPG) on Industrial Capacity (2003) and Draft Sub Regional Development Framework (SRDF) for North London (Haringey, Enfield, Waltham Forest and Barnet) (published for consultation in July 2005). Key points in these documents include:

- One of the Mayor's key objectives is to tackle deprivation and unemployment by increasing access to high quality jobs (London Plan objective 4);
- London has lost 600,000 jobs in manufacturing over the past 30 years (London Plan paragraph 1.41);
- London has the second highest unemployment rate in England (London Plan paragraph 1.61);
- The North London Sub Region has nearly nine percent of London's employment, though growth may be more modest than predicted in the London Plan (SRDF paragraph 19);
- In the North London Sub Region unemployment is higher than the London average (SRDF paragraph 30); and
- The North London Sub Region has seen a 1.2% decline in industrial stock between 2000-2003 (SRDF paragraph 95) though the SPG suggests a net 100ha of industrial land in the Sub Region could be released by 2016 (SPG Annex 1 paragraph 2.10).

Local Policy

- 3.4 The UDP was adopted in March 1998. The First Deposit UDP was published in September 2003 and the Revised Deposit Draft UDP (RDDUDP) in September 2004. Following a public inquiry in the summer of 2005, the Inspector's Report is awaited. Due to its advanced stage, the RDDUDP is considered an important material consideration.
- 3.5 To inform the RDDUDP the Council undertook a review of the existing employment land and buildings in 2003, providing an assessment of the employment land and demand in the Borough (Employment Study).
- 3.6 Key elements of the UDP and RDDUDP in relation to employment are set out below:
- Given the high levels of unemployment, associated with the decline of the traditional light industrial activities in the 1990s (UDP paragraph 1.14), the retention of existing employment activities is a priority (UDP paragraph 1.19);
 - In March 2002 the numbers unemployed claiming benefit in the Borough was 9.1%, this was greater than that for North London (5.6%) and the Capital as a whole (3.6%) (RDDUDP paragraph 1.4);
 - Retaining existing jobs, creating new employment opportunities in appropriate forms and locations and increasing the diversity and quality of employment opportunities is the Council's main priority (UDP paragraph 1.16);
 - The Council seeks to ensure that the supply of employment generating uses in appropriate locations is sufficient for current and future employment needs (UDP paragraphs 1.17);
 - Economic projections suggest that there will be significant employment growth in the Borough (325,476 sqm) in the period 2000-2016 (RDDUDP paragraph 5.9d);
 - Striking a balance between economic development and environmental quality is one of the major concerns of the Council (UDP paragraph 1.25), with the Council seeking to locate economic development where it can be accommodated without adverse effects on the amenity and character of the local environment (UDP paragraph 1.25);

- Economic activities are located in three distinct areas within the Borough; Town Centres; Mixed Areas and Defined Employment Areas (DEAs) (UDP paragraph 1.18). Following the Employment Study, the Council has established a hierarchy of DEAs, including Strategic Employment Locations, Industrial Locations, Employment Locations and Regeneration Areas (RDDUDP paragraphs 5.9-5.13);
- Industrial Location DEAs are amongst the most well established industrial areas in the Borough and the Council aims to retain and in some cases secure improvements to the land and the buildings to improve the overall quality of the areas for employment purposes (RDDUDP paragraph 5.15); and
- Within Industrial Location DEAs the preferred uses are research and development, light and general industry and warehousing, though the RDDUDP recognises that “general industrial and warehousing activities in particular could have a detrimental impact on the amenity of neighbouring uses and the environment” (RDDUDP paragraph 5.17).

Built Environment

National Policy

3.7 PPS1: Delivering Sustainable Development includes the following:

- The development plan and development control process provides for positive planning which operates in the public interest (PPS1 paragraph 2);
- Effective maintenance of the environment is one of the four aims of sustainable development set out by the Government (PPS1 paragraph 4); and
- Planning should seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality through positive policies since the condition of people’s surroundings has a direct impact on the quality of their life (PPS1 paragraph 18).

Regional Policy

3.8 The London Plan includes the following objectives and policies:

- To make London a better city for people to live in, through improving the quality of Londoners' lives and creating a cleaner, healthier and more attractive environment. (London Plan objective 2); and
- Whilst seeking to enhance transport links, adverse environmental impacts need to be mitigated (London Plan policy 3C.5).

Local Policy

3.9 Relevant objectives and policies in the UDP and RDDUDP in relation to the built environment include:

- To improve the quality of the built environment in the areas which have suffered from neglect and insensitive development, while continuing to protect the environmental quality in other areas (UDP Part I, section 8 page 16);
- To enhance the overall quality of the built environment, the attractiveness of the area for investment economic regeneration and the amenity of residents (UDP DES1);
- To protect the character of existing residential areas from inappropriate forms of development (UDP DES5);
- The Council wishes to ensure that the amenities of adjacent occupiers are not materially harmed, and so will not approve applications which have unacceptable effects on the amenities of residents (UDP paragraph 8.57 and DES 1.9); and
- New development in the Borough should not worsen the quality of life for those living and working in Haringey (RDDUDP paragraph 2.10).

Resources, Implementation and Monitoring

Local Policy

3.10 Monitoring enables the Council to identify how the objectives of the adopted UDP are being achieved and to identify new problem areas and trends. Relevant policies include:

- The Council will seek an environmentally sustainable pattern and form of development to achieve the minimisation of pollution (UDP RIM3);

- New developments should not be allowed to adversely impact on the amenities of the neighbourhood thereby reducing the quality of life for local people (UDP 9.48); and
- When considering applications for new development the Council will seek to protect and enhance the amenities of the area (UDP RIM3.2).

4.0 EMPLOYMENT REASON FOR REFUSAL

Introduction

4.1 The Planning Applications Sub-Committee resolved that were the applicants not to have appealed against non-determination, the LPA would have refused the application for three reasons. The second of these reasons relates to employment, raising the following points:

- The additional traffic and its nature would by reason of noise and dust generation be detrimental to current operating and working conditions in Cranford Way;
- Cranford Way comprises predominantly storage and light industrial uses rather than the general industrial use proposed;
- The proposal would discourage businesses from locating in Cranford way;
- The proposal may lead to some occupiers moving out of their existing premises;
- The proposal would lead to a net reduction of jobs in the Defined Employment Area (not offset by the creation of new jobs at the plant); and
- Consequently the proposal would be contrary to policies in the UDP and RDDUDP.

4.2 In essence the LPA considers that the nature of the additional traffic volumes arising from the development would, by reason of noise and dust generation, be detrimental to the operating and working conditions of the occupiers in Cranford Way. The LPA contends that existing and potential occupiers perceive these adverse effects, with the consequence that units on the industrial estate have remained unoccupied, whilst other existing occupiers have indicated that they are likely to vacate their premises. Consequently, although London Concrete Ltd has indicated that the proposal will generate 12 jobs, there is a potential for a net reduction in employment in the DEA.

Additional Traffic

4.3 The planning submission indicates that there will be five mixer trucks operating from the batching plant and two/three cement deliveries per day, equating to a total of 56 HGV movements per day. The Transport Assessment submitted by the appellants' consultants, Bellamy Roberts, noted that the Guidelines issued by the Institute of

Environmental Management and Assessment state that further consideration of environmental impacts is not normally justified where increases in traffic flow are less than 30%, either in total or when considering HGV activity alone.

4.4 One of the most significant differences between the current situation and the proposed position, if the appeal is successful, will be the impact upon Cranford Way. Although the appellants argue that the overall increase in movements on the public highway is not significant, Bellamy Roberts record that there will be a significant increase of HGV movements on Cranford Way south of the Botswana Meat Commission. Appendix 2 of the Bellamy Roberts report recorded a total of 74 outbound movements of HGVs and 73 inbound movements over a 12 hour period for this survey point (the bulk of these movements being medium goods vehicles [2 axle rigid vehicles]). The 28 additional HGV movements each way per day equates to a total increase of HGVs on the southern part of Cranford Way of 38%. If private contractors and cars are included, Bellamy Roberts predict a total of 76 movements generated by the site each day, this equates to a 52% increase in the traffic on this stretch of Cranford Way.

4.5 The Council has been unable to verify the traffic generation figures put forward by Bellamy Roberts. From my experience of batching plants on major projects, it is possible to produce 100m³ of concrete in one hour, which can equate to 12-13 vehicle loads per hour. However, the national average is significantly lower than this figure, and in an appeal decision at Stewart’s Lane in Wandsworth the planning inspector noted that “in Greater London a concrete mixer truck may achieve on average seven deliveries per day”.¹ At an earlier appeal on the same site in Wandsworth, the inspector considered that in favourable conditions it could be possible to have a turn-around time of about an hour (10 deliveries per day)². Table 1 below sets out the three scenarios.

TABLE 1	Number of lorries proposed on site	Number of trips per day	Total concrete lorry movements
Bellamy Roberts figures	5	5	50
Greater London average	5	7	70
Favourable conditions	5	10	100

¹ Planning Inspectorate Ref: T/APP/H5960/A/02/1084148 paragraph 8

² Planning Inspectorate Ref: T/APP/H5960/A/98/299070/P5 paragraph 30

- 4.6 The figures noted in paragraph 4.4 would significantly increase if either the 'Greater London average' or the 'favourable conditions' were applied, with an increase in HGV movements on the southern part of Cranford Way of 51% and 65% respectively. The significance of these impacts upon the occupiers of the various commercial units was not considered by the appellants in their application.
- 4.7 The nature of the increase in traffic will be predominantly HGVs, primarily concrete mixer trucks. Concerns raised by occupiers of units in the DEA (including Botswana Meat Commission and WHSmiths) include the increase in HGV movements within the estate. With vehicles using the loading bays to units 7-11 on the west side of Cranford Way and to units 12-17 on the east, the width of the carriageway is frequently restricted. Outside unit 15, this gap narrows further to 4.26m, as a result of delivery vehicles constantly parked in the loading bays and a skip located hard up to the carriageway in front of unit 8 (see photograph). Consequently there is a potential risk of congestion, inconvenience or accidents as a result of the considerable increase in HGV traffic flow in this part of the DEA.

View down Cranford Way towards Chettle Court (unit 15 on the left)



- 4.8 A further concern raised by occupiers of the units in Cranford Way relates to the nature of the vehicles that will be using the batching plant. The appellants have indicated that wheel washers could be provided, even with such facilities, invariably the body and wheels of the concrete mixer trucks will carry residue on from the site.

In addition slurry has a tendency to fall from the chute and the back of the vehicle, depositing a residue on the road, which with the passage of other vehicles will become dry and add to the dust levels. One occupier (Tradewinds) has indicated that the potential increase in dust will adversely affect their screen printing business, consequently this firm is actively looking to relocate.

Nature of the DEA

- 4.9 In the hierarchy of DEAs identified in the RDDUDP, Cranford Way is designated as an Industrial Location DEA. In the review of DEAs Cranford Way was considered to be one of the more established industrial estates, with its full occupation together with the type of occupier being factors that contributed to this designation.
- 4.10 There are 23 DEAs within the Borough, these provide 133ha of employment land, with over 1,000 buildings, 722 business establishments and nearly 800,000m² of employment floorspace. Approximately half of the DEAs are designated as Industrial Locations, equating to 50% of the industrial land. Cranford Way Industrial Estate, as one of the bigger and fully occupied estates, is considered an important DEA, with the Council wishing to protect its employment uses.
- 4.11 Although the RDDUDP indicates that class B2 may be appropriate in Industrial Location DEAs, it recognises general industry could have a detrimental impact on the amenity of neighbouring uses and the environment, and that some areas need to be set aside to specifically cater for these activities. The batching plant proposal would fall within class B2, general industry.
- 4.12 It has already been noted that the Mayor's Draft Strategic Planning Guidance on Industrial Capacity (2003) indicates that there is spare capacity of industrial land in the North London Sub Region. The Council considers that with this surplus other sites may be more appropriate for this general industrial use, and that class B2 uses within this DEA would not be appropriate.
- 4.13 The perception from a number of the occupiers and letting agents is that the proposal will be bad for the DEA, bringing in a 'dirty industry' which ultimately will push out existing occupiers and lead to units remaining empty or changing to general industrial use.

- 4.14 The SoCG states that the planning history for the estate encompasses light industrial uses, warehousing and ancillary offices. With the proximity of residential properties to the estate, general industrial uses would not be appropriate.

Discourage Businesses Locating

- 4.15 At the time of the submission of the first planning application in January 2004, all the units on Cranford Way were occupied. The occupiers of the various units within the DEA (including units with addresses in Tottenham Lane) are set out in the tables in Appendix 3. These tables include details relating to the type of business, numbers of staff and also whether or not the company objected to the planning application.
- 4.16 Subsequent to the submission of the first planning application, the occupier of units 10 and 11 vacated the site (though their move was not associated with the possibility of a batching plant locating in the estate). The letting agents SBH Page and Read sought to market these two units for some 18 months, but the units have remained empty. The agents indicated that the estate was previously very popular, although it does suffer from problems with access and egress, and also there are no pavements on Cranford Way. Since the submission of the batching plant proposal, the agents state that they have had difficulty letting units, with a number of potential occupiers citing the possibility of a batching plant located at the end of the Industrial Estate as a reason for not pursuing a lease on premises.
- 4.17 Following the submission of the planning applications the agents for the owners of units 1-6A Cranford Way, Smith Lance Larcade and Bechtol, wrote a letter of objection. Their clients objected to the proposal in terms of the HGV traffic generation within the estate and on the adjoining highway, together with the noise and dust from vehicles associated with the proposal (including concrete slurry spillage on the estate road).
- 4.18 In addition Tradewinds, a light industrial company within the estate, seeking to relocate as a direct consequence of the anticipated adverse impact on its screen printing business, has confirmed that its letting agents (SBH Page and Read) have been unable to secure alternative occupiers to take over the company's lease. Tradewinds state that three firms have lost interest once they have found out about the proposed batching plant.

Lead to Occupiers Moving Out

- 4.19 At the time of the original application all units within the estate were occupied. Since the submission units 10 and 11 have become vacant and a further company, the Botswana Meat Commission, has just closed its cold store and will in the near future close their offices at the entrance to the estate (15 Tottenham Lane).
- 4.20 Within the DEA the occupiers of units 9 (Tradewinds), 15 (BFP Wholesale), 20 (Seltex) and 15A Tottenham Lane (Action for Kids) have indicated that they consider the proposal would adversely affect their businesses as a result of the additional traffic and dust associated with the proposal.
- 4.21 Tradewinds specifically state that they are actively looking to relocate as a direct consequence of the proposal, whilst Action for Kids stated that they may relocate due to the adverse environmental consequences of additional traffic and associated dust.
- 4.22 The implication for this DEA is that there would be a loss of jobs, with units remaining empty and being difficult to let.

Net Reduction of Jobs

- 4.23 Although London Concrete Ltd have indicated that the concrete batching plant will generate new employment for approximately 12 staff (comprising five drivers and three plant staff on site, with two technical and two administrative staff at the company's headquarters), the evidence from a survey of occupiers on the Cranford Way Industrial Estate and information from the estate's letting agents, is that there will be a net loss of jobs.
- 4.24 As noted above, some firms have indicated that they will vacate their premises as a consequence of the proposal, whilst the agents for units 10 and 11 have confirmed that they have been unable to let currently vacant premises.
- 4.25 Since London Concrete Ltd only propose to create eight jobs at this site, even with the loss of only the one company, Tradewinds, there would be a net loss of 15 jobs in the DEA. However, the fact that two other units have remained vacant during this application process (the two units combined could accommodate 50-60 employees) means that there has been a much greater impact on employment in the area. With the closure of the Botswana Meat Commission there is a further loss of 38 jobs, with the potential for these premises remaining vacant as is the case with units 10 and 11.

4.26 If the appeal is allowed and Action for Kids finds that the increased number of HGVs and the associated dust adversely affects their activities with disabled children, then a further 50 jobs could be lost. The Council consider this net reduction in jobs to be unacceptable given the unemployment situation within the Borough.

Employment Situation and Planning Policies

4.27 It is the Council's contention that the proposed development is contrary to policies within the adopted UDP and RDDUDP, and does not accord with Government guidance, notably PPG4, since it will neither provide economic growth nor make environmental good sense.

4.28 The unemployment levels for Haringey, as set out in the development plan, were identified in Section 3. Haringey is one of five London Boroughs (including Barking & Dagenham, Hackney, Newham, and Tower Hamlets), and only eight authorities nationally, where employment rates are below the already low European average of 63.3%.³

4.29 In July 2005 there were 7,960 Haringey residents claiming Job Seekers Allowance, equating to 7.5% of the labour force, which is considerably higher than the rate for London (4.5%) and is over twice as high as the rate for Great Britain (3.2%).⁴ The highest unemployment rate out of all wards in London at 18.2% is found in Northumberland Park (in the north east of the Borough). This is 4.9% higher than the second highest ranking London ward (Harlesden ward in Brent - 13.3%).⁵

4.30 Ward level analysis reveals that, at over 62%, Northumberland Park has the highest proportion of unemployed people who are long-term unemployed or have never worked in London. A further five wards are within the top 13 most deprived wards on this measure.⁶ Results from the 2001 Census suggest that long-term unemployment is a serious issue facing Haringey. Over 50% of unemployed Haringey residents have not worked for over two years or have never worked.⁷

³ Guardian Unlimited, 28 October 2005

⁴ Source: GLA & ONS Claimant Count, 2005

⁵ Source: GLA & ONS Claimant Count, 2005

⁶ Source: ONS Census 2001, Crown Copyright

⁷ Source: ONS Census 2001, Crown Copyright

- 4.31 Hornsey ward, which includes Cranford Way, and the adjoining wards of Noel Park and Haringey have levels of unemployment only slightly lower than the five most deprived wards (Hornsey's rate is 7.9%).⁸
- 4.32 The need to protect employment within the Borough is therefore a very high priority for the Council. The Council considers the promotion and retention of employment within the Borough, and its DEAs, to be a key priority. This is recognised in the Council's Community Strategy, the overarching plan for the Borough, which seeks to improve the quality of life for people living, working, learning, visiting and investing in Haringey.

⁸ Source: ONS (Jobcentre Plus administrative system) & GLA estimates
LON2005\R10442-02 (Proof of Evidence)(Final)

5.0 AMENITY REASON FOR REFUSAL

Introduction

5.1 In addition to the employment reason for refusal, the Planning Applications Sub-Committee proposed that the application should be refused on two amenity grounds. Reason 1 stated that:

- At least 56 lorry movements would be generated;
- Additional traffic would result in disturbance to residents in nearby roads to a degree that would unacceptably detract from their amenity; and
- Consequently the proposal would be contrary to policies in the UDP and RDDUDP.

Additional Lorry Movements

5.2 As stated in the SoCG, the appeal site is located at the southern end of the Cranford Way Industrial Estate, with the only point of access/egress to the highway network being from Tottenham Lane. Tottenham Lane is one way taking southbound traffic from Turnpike Lane. In order to head north, HGVs from the site would need to enter Tottenham Lane, head up the hill and turn right into Church Lane.

5.3 Tottenham Lane has the Haringey Boys Club directly opposite the entrance to Cranford Way, with residential properties on the north side commencing 40m up the hill. Near the junction with Church Lane there are residential properties on both sides of Tottenham Lane, and Church Lane itself also has residential properties on both sides of the road. HGVs exiting the site would pass within 6-10m of the front windows of the properties in both Tottenham Lane and Church Lane. The residents of these properties already experience harm to their amenities in the form of noise and general disturbance from the heavy traffic using the one way system.

5.4 The situation for residents in Tottenham Lane and Church Lane is not dissimilar to that for residents near the Wandsworth batching plant, also located adjacent to an employment area. Tottenham Lane and Church Lane are already under 'environmental pressure' and like the residents in Wandsworth there is "little private

space on which to enjoy quiet moments away from road traffic.”⁹ The inspector in the second Wandsworth appeal considered that “in those circumstances tall and bulky HGVs such as concrete mixers passing near to front windows, or close to pedestrians, would have a more disturbing effect than cars or smaller commercial vehicles.”¹⁰

- 5.5 Although the appellants’ traffic consultants, Bellamy Roberts, indicate that the increase in the volume of traffic on Tottenham Lane would not be significant, and that the junction capacity of Cranford Way could accommodate the additional vehicle movements, I consider that the nature of the additional traffic would cause further harm to the amenities of the residents of Tottenham Lane and Church Lane.
- 5.6 As has been noted in the previous section, the movement of concrete mixer trucks is invariably accompanied by the deposit of residue material on the roads, which is likely to be exacerbated by the climb up Tottenham Lane. The inspector in the second Wandsworth appeal noted the “significant amount of tracking out of dust and grit” and that “even small increases in current HGV traffic flows would have a significant cumulative effect on the living conditions of residents.”¹¹
- 5.7 As noted in section 4.5, Bellamy Roberts forecasts are based on five movements per mixer truck per day, whereas the Greater London average is higher at seven movements per day. In favourable conditions, the movement could be as high as 10 movements per day. Thus there could be a total of 70-100 mixer truck movements per day, which when the other vehicle movements are added could be 96-126 movements per day. Bellamy Roberts record 331 HGVs on Tottenham Lane in their 12 hour day, thus the potential increase in HGV movements would equate to 23% - 32%.
- 5.8 Although the appellants’ consultants calculate the movement of vehicles over a 12 hour period, the nature of the delivery of concrete is that there are peaks and troughs. Construction sites usually require a concrete pour at the start of the day, with demand slackening off towards the end of the working day (with the last concrete pour around 17.00).

⁹ Planning Inspectorate Ref: T/APP/H5960/A/02/1084148 paragraph 16

¹⁰ Planning Inspectorate Ref: T/APP/H5960/A/02/1084148 paragraph 16

¹¹ Planning Inspectorate Ref: T/APP/H5960/A/02/1084148 paragraph 17

- 5.9 Thus, at 07.00 it is likely that all five mixer trucks located at the site will be loaded and leave the site within the first 45 minutes. At this time of the morning the road is relatively quiet, consequently the movement of these vehicles is likely to adversely affect the residential amenities of occupiers of properties in Tottenham Lane and Church Lane. As the day proceeds, with lorries frequenting different sites, the arrival and departure times will be more spread out. However, the delivery and laying of concrete is affected by the weather, thus if it is raining sites are unlikely to require concrete, though with improvements in the weather, construction sites will seek to catch up, trying to reschedule deliveries that had been halted. Consequently, concrete mixer trucks will again congregate at the batching plant and leave within a short space of time.
- 5.10 The other area where there is likely to be a significant increase in HGV traffic, with adverse impacts on the amenities of residential occupiers, is on the 'western loop'. Although the appellants indicates that this branch of Cranford Way will not be used, and they indicate that a condition would be acceptable, the LPA will not be able to enforce such a condition. With rear gardens backing on to Cranford Way, and in some instances being below the road level, the residents of properties in Uplands Road are likely to have their amenities detrimentally affected by the proposal.

Disturbance to Residents Amenities

- 5.11 The nature of the proposed development is that of a general industrial use (class B2), a form of use that would not normally be appropriate in a residential area, nor one that the Council wishes to encourage in this Industrial Location DEA.
- 5.12 The review of the development plan policies (and national and regional guidance) shows that environmental considerations are a material consideration. Cranford Way Industrial Estate was formerly the Hornsey Goods Yard. In the mid 1960s planning permission was granted for the warehouse units that back on to residential properties in Rathcoole Avenue (now units 1-5) and Uplands Road (now units 7-11). The access road to these units was between the warehouses and the gardens of the residential properties, though subsequently the element behind units 1-5 was closed (leaving only the 'western loop'). In 1967 planning permission was granted for two warehouse buildings with ancillary offices (now units 6 and 6A). The warehouse units on the eastern side of Cranford Way (units 12-17) were granted planning permission at the end of the 60's.

- 5.13 As set out in the SoCG, Cranford Way Industrial Estate is predominantly occupied by light industrial (class B1) or warehouse/distribution (class B8). The only units that do not necessarily fall within these categories are the plant hire and builders merchants, which have separate accesses from Tottenham Lane (these are most likely *sui generis*). Class B1 comprises offices, research and development and any industrial process “being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.”¹² Change of use from either class B1 or B8 to general industry (class B2) does not benefit from permitted development rights, thus the LPA will always be able to determine applications on the Cranford Way Industrial Estate for such proposals. With the proximity of residential properties in Uplands Road, Rathcoole Avenue, Rathcoole Gardens, Tottenham Lane and Church Lane, the LPA would consider the impact on the amenities of occupiers of these residential premises as a material consideration.
- 5.14 There has been significant opposition from local residents and businesses to the proposed batching plant. Petitions were submitted to the LPA with in excess of 2000 signatures as well as 115 individual letters of objection to the application (with 155 to the first application). I believe that the sustained and vociferous opposition from local residents and businesses is an indicator that the impact on the amenities of the area will be unacceptable, with the environmental capacity of the area already having been exceeded. In this regard I believe that the appeal proposals fail to comply with the policies in the adopted UDP and RDDUDP that seek to protect the environment and amenities of residential occupiers.
- 5.15 The appellant’s dust consultants, Smith Grant, have stated that the baseline levels of dust are likely already to be elevated due to the presence of busy urban roads and the Cranford Way Industrial Estate¹³. Even with the environmental controls that the appellants are offering, deposits of gritty particles, aggregate and concrete slurry are likely to occur as the mixer trucks leave the site into Cranford Way and access Tottenham Lane and climb the hill.
- 5.16 Residents in the area and occupiers of the Cranford Way Industrial Estate have indicated that frequently Tottenham Lane is congested, with emergency service vehicles unable to pass traffic even with the use of lights and sirens. On the basis of

¹² The Town and Country Planning (Use Classes) Order 1987

¹³ Smith Grant Airborne Dust Assessment November 2003 paragraph 5.2.1

experience from other batching plant operations, in order to supply concrete for the start of a working day, many movements will be expected at the peak period (between 07.00 and 09.00), when Tottenham Lane and Church Lane have high traffic flows. There is a potential therefore for the HGVs to have to wait before being able to merge into the traffic. The heavy loads, together with the nature of the load, could increase the amount of noise, dust and fumes in this already polluted area. It is worth noting that the whole of Haringey had been declared an Air Quality Management Area, with particular concerns in relation to PM10s (predominantly particulate emissions from diesel engines such as lorries) and NO₂ (predominantly from road traffic).

- 5.17 Although it may not be possible to quantify these impacts upon the amenities of residents in the area, in terms of either air pollution or noise standards, the impacts need to be considered as part of the overall picture of general disturbance to the residents in the nearby roads.
- 5.18 The appellants have indicated that the site will be controlled by other environmental legislation. However at the first Wandsworth appeal, the Council's Environmental Health Officer indicated that his experience with batching plants was that even with the issue of a permit under the Local Authority Air Pollution Control regime, the complaints in relation to noise and dust to the Council did not cease, in spite of the operator having upgraded the plant to comply with BATNEEC (Best Available Techniques Not Entailing Excessive Costs) standards.
- 5.19 As noted in section 4.4, one of the most significant changes in the traffic levels will be on Cranford Way itself. Having visited the site on a number of occasions, it is evident that the southern end of Cranford Way is heavily used. At times there are delivery vehicles reversing into loading bays and parked in front of the warehouses on both sides of the estate road (units 7-11 and units 12-17). Consequently the main through route in Cranford Way can be blocked, or only a narrow gap of around 4m left open. In such circumstances, with delivery times for operators of the concrete mixing trucks being critical, it is probable that these vehicles will use the 'western loop'.
- 5.20 The residents of Uplands Road have in the past experienced detriment to their amenity as a result of vehicle movements along the 'western loop'. In this area, the free holders of Cranford Way have erected signs warning occupiers to respect the neighbouring residents. The Environmental Health Officers have also made

representations on applications for Goods Vehicle Operators Licences, due to the proximity of Units 7-11 to residential properties.

- 5.21 As noted in 5.10, the appellants have indicated that they will accept a planning condition to prevent the use of the 'western loop' by their operators. However this condition will be hard for the LPA to enforce, given that the Council could not monitor the situation continually and with Cranford Way being a private road. The significance of the impact could be even greater if the number of vehicle movements from the batching plant reflected the average levels of operating for Greater London or the levels that could be achieved in 'favourable conditions'.
- 5.22 The gardens of nos. 30-54 are elevated above Cranford Way (with a retaining wall to the embankment within the Industrial Estate). The gardens of nos. 56-64 are only slightly above the level of Cranford Way, whilst nos. 66-74 are at the same level as Cranford Way. The gardens of nos. 76-94 are all below the level of Cranford Way, in some instances by 3.5m, thus the first floor level of these properties is at the same level as the estate road. Given the size of these rear gardens, only 8m in depth, and the distance of the rear elevation of the properties from the road, only 10m, it is inevitable that if the HGVs associated with the proposed batching plant use the western loop there will be detriment to the occupiers of these residential properties.
- 5.23 The use of the rear gardens by the residents will be adversely affected as a result of the noise, fumes and dust generated by these concrete mixing vehicles. Whilst there is the potential for noise and vibration affecting the residents within their properties, to the extent that the occupiers of the properties below Cranford Way (nos. 76-94) may suffer significant loss of amenity.

Amenities and Planning Policies

- 5.24 National policy recognises that the condition of people's surroundings has a direct impact on the quality of their lives, and planning should seek to ensure the effective maintenance of the environment.
- 5.25 This is reflected in policies in the UDP and RDDUDP which seek to protect the character of existing residential areas from inappropriate forms of development and ensure that new development in the Borough does not worsen the quality of life for those living and working in Haringey.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 The appellants have stressed the suitability of the site in terms of being served by a railhead and being located partially within a DEA. However, I believe that the overriding concerns about the proposed development in terms of the overall impact upon the amenities of occupiers of the estate, surrounding residential areas and employment within the DEA, have not been overcome.
- 6.2 I consider that these other material considerations, namely: the adverse impact upon the existing and potential occupiers of the Cranford Way Industrial Estate; the net loss of employment; the detriment to amenities of residential occupiers in the area (particularly Uplands Road, Tottenham Lane and Church Lane) and the noise implications (covered in the proof of evidence of Dani Fiumicelli), far outweigh the advantages of a batching plant being introduced into the area.
- 6.3 I therefore urge the Inspector to dismiss the appeal.
- 6.4 Should the Inspector be minded to allow the appeal, I consider that the permission should be subject to conditions (these will be set out in a separate document). I believe that conditions are necessary in order to ensure that the amenity of the adjoining businesses and residential occupiers is not significantly harmed as a result of the proposed development.

APPENDIX 1: POLICY DOCUMENTS REFERRED TO

National

Planning Policy Statement 1: Delivering Sustainable Development (Jan 2005) (PPS1).

PPG3 (Consultation Draft): Supporting the Delivery of New Housing (2003).

PPG3 Housing Update: Supporting the Delivery of New Housing (January 2005)

Planning Policy Guidance Note 4: Industrial and Commercial Development and Small Firms (PPG4) (1992).

Planning Policy Statement 23: Planning and Pollution Control (Nov 2004) (PPS23).

Regional

The Mayor's Spatial Development Strategy (The London Plan) (February 2004)

Draft Strategic Planning Guidance on Industrial Capacity (2003)

Draft Sub Regional Development Framework for North London (July 2005)

Local

London Borough of Haringey Unitary Development Plan (March 1998)

First Deposit Unitary Development Plan (September 2003)

Revised Deposit Draft Unitary Development Plan (September 2004)

The Haringey Employment Study (2003)

Haringey's Community Strategy: April 2003 -2007

APPENDIX 2: KEY POLICIES REFERRED TO

UDP (1998)

EMP1: Strategic Employment Policy

To protect existing land and buildings in industrial and commercial use from other forms of development, and to encourage investment and the development of a variety of new employment uses in appropriate locations, in order to enhance the quantity and mix of local job opportunities.

EMP2: Strategic Employment Policy

To increase employment opportunities and to improve access to secure, well-paid employment for local people, especially those discriminated against in the labour market.

EMP3: Strategic Employment Policy

To protect and improve the local environment by ensuring that development of economic activities does not adversely affect the local amenity or transportation networks.

EMP1.3: Defined Employment Areas

The Council has designated areas as indicated in Schedule 1 as Defined Employment Areas where the priority will be to sustain a special range of employment generating uses:

- 1. General Industrial Uses (Use Class B2).*
- 1. Business Uses (Use Class B1) but generally excluding proposals for new large scale free-standing non-ancillary office floorspace in locations which are not well related to public transport.*
- 2. Warehousing (Use Class B8) but only in line with policy EMP1.6 on warehousing.*

EMP 3.1 Amenity, Design and Transport Considerations

Business, General Industrial and Warehousing uses will be required to conform with policies contained in the Design and Conservation, Transport, Resource, Implementation and Monitoring and Open Space Chapters of the Plan with the aim of achieving high standards in terms of:

- 1. Design, materials and landscaping.*
- 2. Access and facilities for people with disabilities.*
- 3. Car parking, loading/unloading facilities and circulation space.*
- 4. Servicing arrangements including waste management and recycling facilities.*
- 5. Health hazard, pollution and noise control.*
- 6. The impact on the townscape, local road and public transport networks.*
- 7. Safeguarding nature conservation interests.*
- 8. Energy Conservation and use of renewable energy.*

DES 1 Strategic Design Policy

To encourage good design of new buildings, alterations and extensions and conservation of buildings and fabric contributing character to the local environment in order to enhance the overall quality of the built environment, the attractiveness of the area for investment, economic regeneration, and the amenity of residents.

DES 5 Strategic Design Policy

To protect the character of existing residential areas from inappropriate forms of development, to ensure that any new developments respect the existing character, pattern and standard of development, to sustain and develop stable, secure residential neighbourhoods and communities.

DES 1.9 Privacy and Amenity of Neighbours

In order to protect the reasonable amenity of neighbours planning permission for development or change of use should meet the following criteria:

1. *The scheme would not be unacceptably detrimental to the amenity of adjacent users, residents and occupiers or the surrounding area in general (see also RIM 3).*
2. *The scheme allows for adequate sunlight and daylight to reach new adjoining properties.*
3. *The degree of privacy enjoyed by adjoining properties is not unacceptably reduced and new problems of overlooking are not created.*
4. *The scheme complies with policies RIM 3.2 (Pollution) and RIM 3.3 (Nuisance).*

RIM 3.2 *Pollution and Nuisance from New Development*

When considering applications for new developments and changes of use, the Council will seek to protect or enhance the amenities of the area. In particular planning permission:

1. Will not normally be granted to developments which cause noise, smell, smoke, soot, grit, dust, vibration or other forms of pollution or disturbance including traffic movements and vehicle obstruction above acceptable levels.
2. May include conditions to control hours of operation and delivery and to protect families.
3. Will make appropriate provision for parking, servicing and refuse storage to avoid undue disturbance to the neighbourhood.
4. May include conditions to control the impact of construction activity.

RDDUDP (2004)

EMP1: Defined Employment Areas (DEAs) – Industrial Locations

The Council will seek to protect and enhance the Borough's Industrial Locations as identified in Schedule 3 and on the Proposals Map, for the purposes of employment uses falling within use classes B1 (b) (c), B2 and B8 or similar uses.

Proposals for uses outside the 'B' use classes mentioned above, will not be permitted in the Industrial Locations unless they:

- a) are ancillary to a mainly employment generating use;*
- b) will not compromise the employment status of a DEA, and is a complimentary use needed for the area to function effectively for employment purposes;*

EMP5: Promoting employment uses

Proposals for employment generating uses within and outside the Defined Employment Areas will be supported providing that:

- a) any trips generated by the proposal are catered for by the most sustainable and appropriate means;*
- b) if it is on the edge and adjacent to a DEA, the proposal does not unduly inhibit the continuing operation of existing employment generating uses or compromise the employment status of the area; and*
- c) the building has been designed to enable convenient adaptation to a range of employment uses and large units can be readily subdivided.*

Proposals for warehouses and storage (B8) should not lead to the loss of a good quality site for business or industry or any other labour intensive activity.

UD2: General Principles

The Council will require development proposals to demonstrate that:

- a) there is no significant adverse effect on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light, and noise pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;*

- b) where appropriate, the proposal complements the character of the local area and is of a nature and scale that is sensitive to the surrounding area;
- c) the proposal would not significantly affect the public and private transport networks, including highways or traffic conditions;
- d) there is access to and around the site and that the mobility needs of pedestrians and cyclists and people with difficulties (including wheelchair users and carers with pushchairs) have been taken into account; and
- e) opportunities for soft landscaping, including appropriate tree retention and tree planting, have been taken into account.

APPENDIX 3: CRANFORD WAY OCCUPIERS

Unit	Occupier	Description	Employees	Response
1	Access storage	Storage	3	No objection
2	Trans Portugal		5	No objection
2	Cannonbury Antiques Ltd	Antique distribution	4 office staff	Object Can't remember if originally objected.
3	Southern	Music related distribution	8	Probable impact but did not object
4	Access storage	Storage	4	Feels it should be located elsewhere – cant remember if originally objected
4	J & R Designs	Kitchen Design	1	No Objection
5	Access storage	Storage	See above	
5	A2Z Global Cash and Carry	Food distribution	2-3	No objection
5	Insulate your Home	Insulation company	3 office staff	No objection
6A	NCN Express	Parcel distribution		No information
6	DT Services	Work distribution company	5	Object on traffic grounds but not considering moving out.
7	HV Logistics	Courier service	2 office staff	No objection
8	Remstor Services Ltd	Storage/distribution	3 office staff	No objection
9	Tradewinds	Promotional merchandise supplier	23	On site 7 years – will leave, 3 separate potential occupiers pulled out
10	Vacant			
11	Vacant			
12	EDF Islington Lighting		35 in depot	No objection, though access road is tight
13	Arsenal FC	Home shopping warehouse	30 in depot and call centre	No formal objection
14	Woolworths	Distribution	6 in office	No objection
15	BFP Wholesale	National wholesalers of ingredients to bakers in the UK	24	Objected to original application on the grounds of numbers of trucks and dust
16	WH Smiths	Customer Services	160 employees 77 vehicle movements / week	Agent's Donaldsons wrote opposing 1 st and 2 nd application – only recently moved to the site
17	WH Smiths	“	“	“
20	Seltex Ltd	Wall coverings	10 employees	Did not receive original notification – object to dust potential
21	Gilmac Plant	Plant and merchandise hire	40	No objection

TOTTENHAM LANE OCCUPIERS

Unit	Occupier	Description	Employees	Response
11	Jewsons	Builders merchants	4	No objection (separate access)
11	Crowleys	Road maintenance contractor	20 drivers	No objection (separate access)
15	Botswana Meat Commission	Cold store	23 office staff	Strongly oppose Company is closing down with 38 ppl redundant.
15A	Action for Kids	Help disabled children and young people - offices	50 staff	Informally objected (landlord BMC wrote on their behalf) Would consider moving out (environmental objection and traffic congestion)
23/25	ESCOSS Ltd	Trading as Maren Meats (meat distribution)		No information

* Shading indicates that the occupiers have objected to the proposal.