

*Contaminated Land  
Air Quality  
Environmental Audit*



Partnership No: OC 300776

**ADG 3**

**Town & Country Planning Act 1990  
Section 78 Appeal**

**Concrete Batching Plant  
at Ferme Park, Hornsey**

**Summary Evidence of:**

**Alexander David Grant  
Smith Grant LLP**

**on behalf of:**

**London Concrete Ltd**

**Planning Inspectorate Reference: APP/Y5420/A/05/1189822  
Local Authority Reference: HGY/2005/0007**

**R616-R05  
November 2005**

- 1 London Concrete applied to Haringey Council to construct and operate a rail-fed concrete batching plant at Ferme Park, Hornsey. Smith Grant LLP (SGP) undertook a dust assessment of the proposed development. Following non-determination, which was appealed, an essentially similar application was made. This was then amended and an addendum dust assessment was provided. Permission for the parallel application was refused and it was resolved that the original application would also have been refused. The reasons, which were identical in both cases, in part assert that the additional lorry movements will cause unacceptable or detrimental dust impacts to local residents and to businesses on Cranford Way.
- 2 The plant will be designed and operated to minimise the emission of dust at all stages of the process from the receipt of aggregates and cement to the discharge of the batched concrete into the truck mixers. This is standard for all of London Concrete's batching plants and has contributed to a record of no substantiated complaints in respect of dust over several years.
- 3 It is proposed to deliver aggregates by rail via an enclosed bottom discharge unit into a ground level hopper, from where they will be transferred by an enclosed conveyor into fully clad storage bins. The aggregates will then be transferred as required by a second enclosed conveyor into the plant. Notwithstanding the positive features of the original scheme, in response to points raised at meetings with the Council, amendments were drawn up, including the re-orientation of the plant and additional cladding to the plant and storage bins.
- 4 It was assessed that it is unlikely that the operation of the plant will cause any adverse impacts due to airborne dust or air quality. This is consistent with advice in the Best Practice Guide appended to *The Environmental Effects of Dust from Surface Mineral Workings* to the effect that concrete batching plants have "*LOW emission potential (with mitigation)*". In the addendum assessment, it was identified that, although the original scheme was unlikely to cause adverse impacts, the proposed amendments would confer some additional benefits in terms of dust control.
- 5 The Environmental Health Officer subsequently advised that he had "*no problems with air pollution*" from the proposed plant and further advised that he had no comments on the addendum report, save that, were the application to be approved, appropriate measures were to be taken during the construction phase, in accordance with the draft London Code of Practice.
- 6 During the assessment of the application, Casella Stanger carried out a peer review of the dust assessment. Casella identified various differences in approach but did not dissent from the overall findings and concluded that their "*professional judgement is that the impacts of the London Concrete plant will be negligible (my emphasis)*".

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- 7 Notwithstanding the findings of the dust assessments which were submitted with the applications, the EHO's comments and Casella's review, assertions were included in the Committee Report about "*concerns about dust raised from roads*" and "*the impact of exhaust fumes*".
  - 8 With regard to the potential impacts on local residents, the small proportionate increase in airborne dust levels due to the additional HGVs stirring up existing dust is very unlikely to have a discernible impact. Little new dust will be created, whether as a result of spillages from the mixer drums or material falling from the wheels and chassis. Finally, the DMRB modelling which has been carried out indicates that there will be no significant impact on local air quality.
  - 9 Similar considerations apply in respect of businesses on Cranford Way. From the highways evidence provided by Mr Bellamy, it can be seen that the increase in HGV movements is small compared with the existing and historical levels. Taking into account the accepted allocation for the site, ie, as a distribution depot, the vehicle movements associated with the plant are unlikely to have a significant additional impact. Nevertheless, as a responsible business and to avoid unwarranted fears, London Concrete will wet sweep Cranford Way in conjunction with the twice-weekly sweeping of the application site. This will actually give a positive benefit in terms of reduced dust levels along Cranford Way.
  - 10 In response to concerns raised by Green N8 and other third parties, although these were not included in the reasons for refusal, Dr Ingram has provided an evaluation of the health issues associated with the proposed plant. Dr Ingram assesses that adverse health impacts are not likely to arise from dust associated with the materials used in the batching process. He makes specific reference to asthma and notes that "*mineral particles are not allergenic and would therefore not be expected to give rise to asthma*".
  - 11 Planning permissions for concrete batching plants are conditioned to prevent or control environmental impacts, including dust and air quality. The process will be regulated by the Council under Local Air Pollution Prevention and Control (LAPPC). Any permit which may be issued will be based on Process Guidance Note 3/1 (04), *Secretary of State's Guidance for Blending, Packing, Loading, Unloading and Use of Bulk Cement*, with the objective of controlling the release of dust at all stages of the process. London Concrete has applied for a LAPPC permit but this will not be assessed until the planning process has been completed.
  - 12 Notwithstanding the application for a LAPPC permit, a separate S106 unilateral undertaking is being prepared to secure for the Council controls for, amongst other matters, dust management at the site. A dust management scheme has been drawn up in accordance with current best practice, and will be annexed to the undertaking.

- 13 It is the corporate policy of London Concrete to minimise the impact of its operations on the environment, as is evidenced by the construction and operation of the company's existing plants around London. This approach, coupled with effective planning and pollution control, will ensure that emissions from the proposed concrete batching plant do not cause any adverse impacts in the vicinity of the site.
- 14 In conclusion, dust and air quality assessments were submitted with the planning applications for the proposed concrete batching plant. These concluded that the operation of the plant is unlikely to have any harmful impact in the vicinity of the site. Exhaust emissions and releases of fine particulates will not result in adverse air quality impacts. These conclusions are consistent with the views of the EHO and accord also with the professional judgement of Casella Stanger, namely, "*the impacts of the London Concrete plant will be negligible*".