Town & Country Planning
Section 78 Appeal

Concrete Batching Plant
At Ferme Park Railway Sidings, Cranford Industrial Estate,
Hornsey, London Borough of Haringey

Proof of Evidence

LONDON CONCRETE

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Planning Inspectorate Reference: APP/Y542/A/05/1189822

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SECTION 1: INTRODUCTION

1.1 My name is Derek Casey. I am the Managing Director of London Concrete Limited.

1.2 In my role I am responsible to the Board of Directors for Sales, Marketing, Transport Operations, Company Profitability and the development of the company.

1.3 I have over 35 years experience in the ready mixed industry in the Greater London area. In 1970 I joined Willment Ready Mixed Concrete Limited as a Plant Manager, responsible for the day to day running of a concrete plant. I was then promoted to the sales side of the operation before becoming Sales Manager in 1977. In 1980 I was appointed as Group Sales & Commercial Director, where my responsibilities involved expanding the business as well as my sales duties.

1.4 In 1992 Willment Ready Mixed Concrete was acquired by the Pioneer Group of Companies and Pioneer Willment Concrete Limited was formed. This company included the four Willment Concrete plants and the existing nine London based concrete plants that Pioneer already owned. I was appointed Managing Director of Pioneer Willment Concrete in April 1992 and was responsible for profitability and all aspects of the company.

1.5 London Concrete was formed in 1997 as a joint venture between the founding Directors, which included myself, David Barrett and Day Aggregates Ltd. The company commenced trading in June 1997 from rail served plants at Brentford, Middlesex and Purley, Surrey.

1.6 The aim of the company is to build a profitable business and to provide the London area with a customer focused rail-fed supplier of high quality concrete.

1.7 In achieving this aim the company decided that, in line with current Government Policy, (which Mr. Woolner refers to in his evidence) all aggregates would be supplied to the concrete batching plants by rail. This offers a great many environmental benefits, not least a reduction in lorry movements on the already congested roads in London.

1.8 In January 1998 Aggregate Industries plc acquired 51% of London Concrete. Aggregate Industries are the fourth largest aggregate supplier in the UK and one of the largest asphalt suppliers. They transport over three million tonnes of aggregates by rail each year mainly from their Bardon Hill and Croft quarries in Leicestershire to London and the South East. Prior to their shareholding in London Concrete they had only a small involvement in the UK concrete market. They are one of the largest concrete suppliers in Scotland and have now expanded into this sector of the market throughout the UK.

1.9 In March 2005 Aggregate Industries plc was acquired by the Holcim Group. The Holcim Group are the second largest supplier of Cement in the world; and also one of the largest suppliers of construction material.

1.10 In March 1998 the company opened its third rail served concrete plant at Bow in East London. This plant has now developed into one of the busiest in the UK. This was followed in September 1998 by a fourth plant at Pensbury Place, Battersea. This plant was originally road served, but has since been relocated to a railhead at Stewarts Lane, Battersea and production commenced in December 2004.

1.11 In June 1999 the company opened its fifth rail served plant at Greenwich, South East London, which was followed by a sixth rail served plant at Wembley, North London, in September 1999.

1.12 In March 2000, the company opened its seventh concrete plant, based on a quarry in Gerrards Cross, Buckinghamshire. As this plant is on a quarry, all required aggregate supplies are on site, eliminating the need for aggregate supplies by road or rail to the plant.

1.13 In September 2000, planning permission was secured for a rail-served plant at Colnbrook, to the west of Heathrow Airport. This plant has been operational since June 2002 and is supplying concrete associated with the construction of Heathrow Terminal 5.

1.14 Planning permission was also secured, in April 2002, for a rail-served plant at Orphanage Road, Watford. This plant was opened in April 2005 and is the companies 9th concrete plant.

1.15 In September 2004, on appeal the company gained permission to build a further rail served plant at Tolworth Goods Yard, Tolworth, Surrey. Construction of this plant will commence in early 2006 with a planned operational date of 1st July 2006.

1.16 During the year 2004 the company produced 668,000m3 of ready mixed concrete and has a market share in the London area of approximately 23%.

1.17 The company now employs over 100 staff. These are based at our concrete plants in London and at our Head Office in Brentford, Middlesex.

SECTION 2: THE LONDON CONCRETE MARKET

2.1 Prior to 1991 there were six major concrete producers operating in the London area. As a result of the recession in the early 1990s, together with the rationalisation which took place in the construction materials industry, the bulk of the London market was reduced to three major suppliers: Ready Mixed Concrete Ltd, (acquired by Cemex in early 2005) Pioneer Concrete UK Ltd (acquired by Hanson PLC in 2000) and Tarmac Topmix. (acquired by Anglo American in 2000) Between them they supplied 95% of the London market. The bulk of the remaining 5% was supplied by Lafarge Concrete and Brett Concrete who do not have operations inside London but can supply smaller contracts on the outskirts. There are also a few plants owned and operated by independent companies, mainly mini mixers.

2.2 London Concrete's forward thinking and rail linked environmental plants offered us advantages over the existing suppliers in so much as we were following the policy example set by the Government to secure the transfer of freight and aggregates traffic from road to rail.

2.3 The overall market for concrete in Greater London for the year 2004 was 2,327,000m^3. During this year London Concrete supplied 527,879m^3 inside this area which equates to a market share of just under 23%. The remainder of our production was supplied into the Buckinghamshire, Berkshire and Hertfordshire markets. It is our intention and expectation that we shall achieve and retain a quarter of the concrete market in London.

2.4 As is explained in the evidence of Mr. Woolner there are no concrete plants in the London Borough of Haringey. Therefore all concrete requirements for Haringey are supplied from plants outside the borough which creates a significant amount of H.G.V. traffic. Further, in most cases these supplies are presently made from very old and unsustainable sources.

2.5 Haringey's concrete requirements to the south of the Borough are met from the Tarmac and Hanson plants at Kings Cross. These companies have operated from this location since the early 1970's and, as a consequence of the Channel Tunnel rail link into Kings Cross, they were re-located with new rail supplied plants inside the site in late 2004. RMC have operated a road supplied plant at Kings Cross since the late 1960's. They have also been affected by the Channel Tunnel rail link which has reduced in their site in size and as they are unable to replace their very old plant in a sustainable manner, as a consequence of this we understand that it will close within the next 12months.

2.6 Supplies to the North of the Borough are made from the Hanson and RMC plants at Edmonton. In extreme cases supplies are also made from the Lafarge plant at Jeffries Road Enfield. However this plant is too far away for practical and sustainable supply.. All these 3 plants are road supplied. The RMC plant was built in 1960's and the original Hanson plant was built in 1963 and then rebuilt in 1995.

2.7 Document 1 provides details of the current 6 plants capable of supplying the Haringey market together with our assessment of the degree to which each plant can penetrate into this trading area.

Document 1

2.8 As is outlined in the evidence of Mr Woolner, the majority of these alternative plants are over 25 years old, and only 2 plants are rail-fed. The remaining plants are not rail-fed, and do not include the design features and improvements that are standard on our existing plants and the proposed plant. All our plants are fully automated and enclosed with dust extractors, all conveyors covered and the silos have pressure relief valves which prevent overfilling. This is not the case with the majority of our competitor's existing plants.

2.9 Due to the fact that there are no concrete plants in Haringey on a recent major residential scheme at The Pump House Hornsey, which is only ½ mile away from Ferme Park sidings and required 20,000m^3 of concrete, the contractor felt the only viable alternative was to manufacture his concrete requirements on site. As we had a close working relationship with the contractor it was decided that we would manage his plant and produce the concrete thereby ensuring that the concrete was of the required quality, met the specification in full and was not affected by the delay and quality issues of shipping the concrete from outside the borough.

2.10 The scheme required 20,000m^3 of concrete which in turn requires 40,000 tonnes of aggregates. As there were no rail head facilities currently operating in the Borough the only alternative was to bring the 40,000 tonnes of aggregates to site by road. The stone was delivered to site by H.G.V. by Stemma from their sea terminal at Gravesend in Kent and the sand by H.G.V. from their terminal Tilbury in Essex.

2.11 We received approximately 20,000 tonnes from Tilbury which equates to a lorry movement of 102 miles per load and 20,000 tonnes from Gravesend which equates to a lorry movement of 106 miles per load. Therefore this site requirement of 40,000 tonnes of aggregate created 416,000 road miles across the congested London roads and through Haringey.

2.12 It is not unusual for EWS under their statutory powers to open up a railhead such as Ferme Park to enable a temporary facility to supply aggregates by rail for such schemes as the Pump House. In 1999, at Tolworth Goods Yard, EWS opened up the railhead for just under 2 years to supply aggregates required for the construction of the Croydon Tram Link. Also in 1999 EWS opened up the railhead at Stewarts Lane Battersea to provide supplies for our nearby concrete plant at Pensbury Place Battersea. They supplied approximately 250,000 tonnes per year for 5years under their statutory powers until we relocated our batching plant to this railhead in December 2004.

SECTION 3: OPERATIONAL CONSIDERATIONS

3.1 It is proposed to install and operate a covered bottom door discharge system, with an enclosed transfer conveyor to a covered overhead aggregate storage and fully enclosed concrete batching plant on the appeal site. A 5m high acoustic barrier will be constructed around the loading bay.

3.2 The total operation will involve a train arriving to the railway siding, passing into the covered discharge shed and manoeuvring over the bottom discharge bins, discharging the aggregate onto a covered conveyor which will then transfer the aggregate into the covered overhead storage bins. When required it will again be transferred into the smaller enclosed aggregate storage bins inside the batching plant. Sand, stone, cement and water, will then be weighted up in the required proportions and loaded into the truck mixers for onward transmission to the construction sites.

3.3 We anticipate taking delivery of 2/3 trains per week which will take between 2/3 hours to unload. For the remainder of the working week the rail facility will not be used and aggregates will be drawn from the overhead bin into the plant storage when required. Production of concrete will not require the rail offloading and storage system to be in operation. It is only a means of obtaining rail supplied aggregates and containing the material in stock.

3.4 The plant will be a Lanton Park LP2000 which is the most modern of plants available and which we have in operation at 5 of our other locations. It will be housed inside a building, and has been deliberately chosen as being unobtrusive with noise suppression equipment, a dust extraction system, reverse jet filters on all the silos, covered conveyors, a computer batching system and 5m high acoustic barriers around the loading bay. The loading operation will be controlled by a fully trained and experienced batching operator. Every part of the operation is controlled by the main computer. In addition, we are controlled by the Quality Scheme for Ready Mixed Concrete (QSRMC), which is a Government approved independent certification body for ready mixed concrete

3.5 Over the past ten years, technology has greatly improved the operation of concrete batching plants. Indeed, installing a new plant offers many advantages over existing concrete plants which were constructed long before technology, as it is today, was available. Most of the concrete batching plants in London are over 25 years old and because of their open layout and design it would be impractical to retrofit the safeguards and the environmental improvements which are now available. We consider that the computer controlled plant together with the offloading and storage system, which is proposed for the appeal site is the most sophisticated batching plant available in Europe the UK.

3.6 The main computer system is housed inside the batching office. From this office the plant manager can unload the aggregate trains into the enclosed overhead bins, transfer the material by covered conveyors into the enclosed aggregate overhead storage bins in the batching plant, control the rate of cement supplies to the internal cement silos as well as batch the concrete. The entire operation is fully monitored by CCTV.

3.7 The plant will be fitted with an Alkon concrete batching system which loads the concrete mixer trucks. As an industry, we need the capacity to supply the grade of concrete our customers require. This will vary from weak strength concrete for domestic use to high strength concrete for major office complexes or structural bridge decks.

3.8 Under no circumstances can we fail to achieve the strength demands as specified by our customers. To do so could result in the need for further testing and in some cases already poured concrete being removed. This can prove to be a very expensive operation and can cause delays to the site programme. Poor quality concrete will also lead to a lack of confidence in the company from our customers and may damage the prospect of further supply orders. Precision is therefore paramount.

3.9 Once a mix is selected by our experienced batcherman, the computer will weigh up all the required ingredients, amount of concrete ordered and the type of cement required. It will then discharge the materials into the truck mixer. Once the materials are weighed up, the dust extraction equipment will automatically start to operate to ensure a dust free loading process. At the end of the batch cycle the computer automatically provides a full print out of the mix and weights supplied.

3.10 The plant would provide us with a rail unloading facility and the following method of loading the vehicles as shown on the drawings listed below, prepared by M.O'Brien Associates and attached as Document 2.

2416/04 Diagrammatical layout of the concrete plant.

2416/05 Diagrammatical layout of the rail discharge system.

2416/06 Diagrammatical layout of the overhead storage bins.

2416/30 Details of the truck mixer loading area **Document 2**

(i) A Central Pan Mixer

3.11 For this method all materials are weighed up and then discharged into a central pan mixer where they are mixed with the water and the concrete is then discharged into the vehicles.

3.12 As the materials are fully mixed and discharged into the truck-mixer as wet concrete, this method eliminates any possible dust. However, as with the other two methods of loading, the installed dust extraction system will automatically operate in any event when a vehicle is being loaded.

(ii) The Slurry Mix

3.13 This is the overwhelming predominant method of batching which will be used in all cases other than if the central mixer is out of action or planned maintenance is being carried out. In this instance, cement which can generate dust together with the required volume of sand, are weighed up separately and then along with the water discharged into the central mixer to form water based slurry. The stone, which is moist and does not give rise to dust, is weighed up and discharged along with the slurry into the truck-mixer. As well as being a dust free process, this method provides excellent quality control for the production of concrete. This process provides an energy saving method of batching together with less wear on the central mixer and will be the method of batching used in most cases.

(iii) Dry Batch

3.14 This system will only be used as a backup if the main central mixer is not working. Under this method of batching all materials are weighed up and then the sand and stone are discharged on to the batch conveyor and ribbon fed into the truck mixer.

3.15 As this process takes place the cement is also lightly discharged. The bulk of the water requirement is added to the load before the aggregates with the remainder being added when the cement and aggregates are fully discharged.

3.16 As the materials are loaded into the vehicles dry this is a potential dust source. However, because of this we have installed the necessary dust extraction facilities to prevent any dust escaping. This dry method of loading is used in most concrete plants in London and the rest of the UK. As I have already stated, this system is only used as a backup to the central mixer in the unlikely event that the mixer is not working.

3.17 Aggregates will be delivered to site by rail and then unloaded by EW&S.

3.18 Washed aggregates will be delivered by EWS in rail wagons which will be shunted into our rail siding. The train will then manoeuvre over the enclosed bottom discharge bins and when in position the load will be bottom discharged into the bins and then transferred by covered conveyor into the enclosed overhead storage bins. There will be no open storage of materials on site.

3.19 Aggregates for the concrete batching plant will be transferred from the overhead main aggregate storage bins when required by covered conveyor into the smaller fully enclosed bins inside the batching plant.

3.20 The main batching plant will be constructed of steel and will be enclosed in a steel clad building. This will include a roof, a loading bay, a 5m high by 8.5m long acoustic barrier around the loading bay and also a five compartment aggregate bin having a total capacity of 400 tonnes, and four integral 60 tonne silos having a total capacity of 240 tonnes

3.21 Cement is loaded into the four fully enclosed silos from a road tanker. This is delivered to the silos via sealed pipes utilising power from the road tanker. During discharge, air is displaced and this is vented back into the atmosphere via reverse jet filters on all silos. These filters are the most modern available with automatic electrical air agitation to ensure that the air is cleaned at maximum efficiency.

3.22 Each 75 tonne silo is designed so that it can accept two full loads of cement with space to spare (a full load of cement is approximately 31 tonnes). The silos are fitted with electronic alarms and pressure relief valves which will automatically shut off the cement discharge if the material inside the silo reaches the high level indicator.

3.23 The whole operation would take place in a fully enclosed area and is controlled by a qualified batcher. The quality of our concrete depends on this computerised operation being carried out expertly by the concrete batcher.

3.24 A steel water tank with a capacity of approximately 12,000 gallons will be installed to provide the necessary water to ensure the successful operation of the plant at all times and safeguard the depot in the event that there is a failure of the public water supply. The tank is linked to the public water supply system.

3.25 A washout system will be constructed for the collection of all surface water and to ensure the cleanliness of our plant and truck mixer fleet. This unit, comprising three settlement bays and a solid bay, which allows settlement of materials to take place at various stages, in order that clean water is available in the second and last settlement bay. This water will then be recycled and used for the production of fresh concrete.

3.26 These settlement pits are cleaned out on a regular basis. In order to complete this a JCB is brought in and the silt from the settlement bays is transferred into the solids bay which when full will be emptied and transferred to a concrete recycling centre where the material will be re-claimed and reused. We would expect to export 4 loads of waste disposal per month.

3.27 When securing planning permission at some of our other sites the Local Authority has sometimes requested that we install and operate a wheel wash. In all cases after discussing the implications of this it was agreed with the relevant LPA that we would operate without a wheel wash for a short trail period and then reassess the matter. We have always demonstrated that a wheel wash is unnecessary and this position has to date been accepted. We would be happy to do the same here if thought necessary.

3.28 The Health and Safety at Work Act applies to the ready mixed concrete industry and therefore stringent health and safety requirements are enforced. The company qualified Health and Safety Officer will carry out regular site inspections.

3.29 As noted by Mr Grant, the aggregates storage bins and the batching plant will be designed and operated to prevent 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.

3.30 Specific features, in terms of dust control, include:

a) The predominant use of the slurry mixes during the batching process,

b) Enclosure of the truck mixer loading area,

c) Dust extraction from the loading area,

d) Transfer of all aggregates by enclosed conveyors,

e) Full enclosure of the aggregates bins and cement silos within the plant,

f) Visible / audible alarms on the silos to prevent overfilling,

g) Reverse jet filters fitted to the vents of the silos.

h) Automatic closure of the cement inlet line if the pressure relief valve on a silo operates.

3.31 These are standard features at the company's batching plants and have contributed to a record of no substantiated complaints in respect of dust over a period of many years.

3.32 Subsequent amendments to the proposed batching plant, which were drawn up in response to points raised at various meetings with the Council, include:

a) Plant rotated anti-clockwise, with the loading bay now facing northeast, towards the railway tracks,

b) A 5m high acoustic screen along the southeast side of the loading bay, and

c) Full enclosure of the conveyor discharge into the plant.

3.33 Additionally, amendments to the rail-fed storage bins include:

a) Additional cladding at the base of the bins to provide full enclosure of the discharge chutes and bottom conveyor.

b) Full enclosure at roof level of the conveyor discharge into the bins.

3.34 I am advised by Mr Grant that these amendments will reduce still further the already negligible risk of dust emissions from the plant.

3.35 As the vehicles are loaded with ready mixed concrete in a wet state this is a dust free operation. On the odd occasion that spillage occurs when loading, this is usually due to the vehicle not been correctly positioned under the loading bay. Should this happen then any spillage will be washed off the rear of the vehicle prior to leaving the site. Whilst we do not accept that any significant dust will be deposited on the truck while loading, if this was the case then it would be blown off the vehicle either prior to leaving the plant or certainly before it left Cranford Way and entered Tottenham Lane.

3.36 As part of the Companies Management Scheme a road sweeper will visit this site twice a week to clean the site and also ensure that the concrete hard standing and site roads in the plant are maintained to our very high standards as demonstrated at our other London sites.

3.37 The plant will be constructed in accordance with the draft London Code of Practice, Part 1: The Control of Dust from Construction. Thereafter, the site will be operated in accordance with the conditions attached to a LAPPC permit for the process, thus ensuring that dust emissions do not cause any adverse impacts in the locality.

3.38 All new and existing concrete batching processes are regulated by Local Air Pollution Prevention and Control (LAPPC) permits issued by the local authority, as explained by Mr. Grant in section 7.2 of his evidence. Under LAPPC, our batching plants are subject to at least one inspection per year by the local Environmental Health Officer. I attach as Document 3, copies of our current Authorisations and Permits together with copies of the latest inspection records of our plants. These demonstrate that we have achieved full compliance with the requirements of the permits and no improvement notices have been issued in respect of any of our plants.

Document 3

3.39 The local authority has the power to refuse or withdraw a LAPPC permit for failing to comply with the requirements. This would result in the operation being forced to close down until such time as they could demonstrate, to the satisfaction of the local authority, that they have taken the necessary measure to ensure total compliance. As has already been confirmed, we are subjected to at least one plant inspection per year by the local Environmental Health Officer and Document 4 provides copies of the 2004 inspection records for all our plants together with full details of the new LAPPC requirements.

3.40 All ready mix vehicles at this location will be strictly controlled as road going vehicles in accordance with the requirements of the Department of Transport. The plant manager will also be a holder of a certificate of professional competence.

3.41 The plant will be strictly maintained by the company's maintenance staff. The vehicles all operate under a 5 or 7 year Repair and Maintenance Agreement direct with the manufacturer. At the end of these contracts the vehicles are replaced. The ready mixed concrete operation will be regularly inspected by the company's safety officer and is subject to the code of practice and delivery of concrete under the QSRMC.

3.42 Having regard to London Concrete's experience in Greater London, we anticipate that on average one mixer truck will achieve five deliveries per day. Evidence in respect of traffic movements for the Appeal site is dealt with in more detail by Mr Bellamy in his Proof of Evidence.

3.43 In addition to this some small customers or public utilities collect small loads of concrete from our plants. These are usually 1or 2m^3 loads and are either for contracts where it would be un-economical for us to supply in 8m^3 vehicles or such small requirements together with site access problems. This is a very insignificant part of our business and on average, throughout the company, we have 2.53 such collections per day per plant. There is no reason to assume that this plant will attract any more customer collections that the average of our other plants.

3.44 In the table below we detail the average collections per day at each plant for 2004.

Plant	Total average collections per day for 2004
Brentford	1.24
Purley	0.79

Battersea	2.97
Bow	1.11
Greenwich	3.92
Wembley	5.56
Heathrow	2.18
Average daily total for all plants surveyed.	**2.53**

3.45 Due to the short life of our product together with the traffic congestion in the Greater London we find that we are only able to supply within a relatively small radial of the batching plant. We enclose as Document 4 a letter from Richard Hall who is the Director Manager of the QSRMC explaining the necessity and reasons for supplying within the shortest time possible. **Document 4**

3.46 We list below the actual radial miles travelled from our existing plants for 2004 and the first 6 months of 2005

Plant	Ave radial miles 2004	Ave radial miles Jan-July 2005
Brentford	4.33	4.41
Purley	4.96	4.37
Bow	4.22	3.99
Battersea	3.09	3.70
Greenwich	4.44	4.64

Wembley	4.40	4.68
Gerrards Cross	7.02	7.48
Heathrow	3.25	4.06
Company	**4.26**	**4.47**

3.47 Subject to this Appeal being approved, it is anticipated that the operation will employ 10 people on site with a further 2 at our Head Office. It will also create further employment opportunities inside English Welsh and Scottish Railways and within our material suppliers.

SECTION 4: THE QUALITY SCHEME FOR READY MIXED CONCRETE

4.1 The Quality Scheme for Ready Mixed Concrete (QSRMC) is a UK wide scheme for the approval of quality controlled ready mixed concrete and all the operations that are involved in producing the product. This scheme is closely maintained by Inspectors appointed by the QSRMC who carry out regular inspections of approved depots to ensure that we comply in full with their stringent requirements.

4.2 I enclose full details as Document 5 of the QSRMC Scheme, together with a copy of the 'Assessment of Plant and Equipment' audit report for 2004 of all our Plants. In the first quarter of each year, QSRMC carry out an assessment of all Industry audits which were performed across the United Kingdom during the previous year.

Document 5

4.3 The published report provides grades for the assessment for the plant and equipment. The report provides data on how London Concrete has performed during the course of the year and also in comparison to the National Benchmark. The gradings are shown on the next page for each of the categories of this assessment. For clarity I confirm that in all cases the lower the grade, the better the performance.

NATIONAL ASSESSMENT GRADE BENCHMARKS – LAST PUBLISHED DATA

Grade	Assessment of Concrete Plant
0	Excellent
1	Excellent
2	Excellent
3	Good
4	Good
5	Good
6	Good
7+	Below average

4.4 The table below describes the grading achieved by London Concrete during the year 2004 and in comparison to the National Benchmarks. From this table it can be seen that London Concrete has recorded gradings in the 'Excellent' category. These results are significantly better gradings than the National Benchmark.

QSRMC PERFORMANCE STATISTICS FOR LONDON CONCRETE PLANTS FOR THE YEAR 1/1/04 TO 31/12/04 AND COMPARISON TO THE NATIONAL BENCHMARKS FOR 2004

PLANT	QSRMC ASSESSMENT GRADE	QSRMC ASSESSMENT GRADE - NATIONAL BENCHMARK 2004
BATTERSEA	0	1.6
BOW 1	0	1.6
BOW 2	0	1.6
BRENTFORD	0	1.6
GERRARDS CROSS	2	1.6
GREENWICH	2	1.6
HEATHROW A	0	1.6
HEATHROW B	0	1.6
PURLEY	0	1.6
WEMBLEY	0	1.6
COMPANY	**0.40**	**1.6**

4.5 QSRMC evaluates the quality and control of concrete supplied from concrete plants in the UK by means of Standard Deviation. Again, for clarity I confirm that in all cases the lower the standard deviation, the better the performance. Please see table below

PLANT	STANDARD DEVIATION	STANDARD DEVIATION - NATIONAL BENCHMARK 2004
BATTERSEA	3.5	4.4
BOW 1	3.5	4.4
BOW 2	3.5	4.4
BRENTFORD	3.5	4.4
GERRARDS CROSS	3.5	4.4
GREENWICH	3.5	4.4
HEATHROW A	3.5	4.4
HEATHROW B	3.5	4.4
PURLEY	3.5	4.4
WEMBLEY	3.8	4.4

4.6 When comparing the 2004 figures against 2003 figures. I can confirm that we are making continuous improvement in the way we operate our plants from an already very high base.

4.7 As can be seen from these QSRMC documents the company have achieved very high standards, and, when benchmarked against industry standards we have a rating of excellent in all assessment areas.

SECTION 5: AGGREGATES IMPORTED BY RAIL TO SITE

5.1 Generally speaking, two tonnes of aggregates are required to produce a cubic metre of concrete. English Welsh and Scottish Railways will supply by rail two of three trains per week with stone from Bardon Hill in Leicestershire sand from Cliffe in Kent.

5.2 In addition, 2/3 loads of cement will be supplied to the plant by road each day. We understand from EWS that efforts are being made by the cement industry to provide supplies by rail. It is hoped that within the next 12 months cement manufactures will be able to offer supplies by rail. This will allow us to use this railhead to its maximum potential and enables us to take full advantage of industry opportunities to increase freight by rail thereby reducing further the traffic on the roads.

5.3 We anticipate that when fully operational we will achieve a production of 55,000m^3 per year. For this we will require 110,000 tonnes of aggregates which will be supplied to site by English Welsh and Scottish Railways by rail. Without this rail facility this would equate to 11,000 unnecessary and very long road movements 5,500 from Bardon Hill in Leicestershire at 209 miles per movement and 5,500 from Cliffe in Kent a 76 miles per movement. By using the rail network we will be saving 1.567,500 road miles per year.

5.4 Following the process described in Section 3, ready mixed concrete is delivered to the market area in enclosed mixer trucks. Mr Bellamy, in his evidence, deals in detail with the traffic generation attributed to the above level of throughput.

SECTION 6: CONCLUSIONS

6.1 London Concrete is committed to producing ready mixed concrete in a sustainable way. Inside the Greater London area the company already operates eight rail served and one quarry based plant as listed below with a further rail served plant planned to open in mid 2006 at Tolworth Goods Yard in Surrey. During the year 2004, from these rail facilities, the company transported over 1.2million tonnes of aggregates which is in line with Government policy and encouraged and supported by the Mayor of London. The appeal proposed will maximise the use of the railhead at this important strategic rail site.

Brentford Plant – Rail Served

Transport Avenue, Great West Road, Brentford, Middlesex TW8 9HQ.

Battersea Plant – Rail Served

Stewarts Lane. Battersea, SW8 4TP

Purley Plant – Rail Served

Approach Road, off Warren Road, Purley, Croydon, Surrey CR8 2AL

Greenwich Plant – Rail Served

Horn Lane, Charlton, SE10 0RT

Bow Plant – Rail Served

Bow Midland Depot, Wick Lane, Bow, E3 2TQ

Wembley Plant – Rail Served

Great Central Way, Neasden, NW10 0UP

Heathrow Plant – Rail Served

Colnbrook-By-Pass, Slough, Berks, SL3 0EB

Gerrards Cross – Quarry Based Plant

Oxford Road, Gerrards Cross, Bucks, SL9 8TE

Watford – Rail Served

Watford Junction Station, Watford, Herts.

Tolworth – Rail Served

Tolworth Station. Surrey. (To be opened in mid 2006)

6.2 Construction activity in the Hornsey market creates a demand for concrete. The numbers of concrete plants, which are capable of supplying into this market, do not. They only act as a means of satisfying demand. At present this demand is satisfied from outside Haringey creating increased road miles from older concrete plants which in the main have their aggregates supplied by road and are without the modern safeguards as I have detailed in my evidence.

6.3 A refusal of planning permission for a concrete plant on this site will not reduce the demand for concrete or road traffic in the area. This would only lead to the local market being supplied from concrete plants, which are not best placed to serve the Hornsey market as described in Mr Woolner's evidence and a missed opportunity to reduce traffic in the Borough.

6.4 The appeal site has been identified by Network Rail and EW&S as an important railhead which should be developed only for rail freight purposes. The proposed use is wholly in accordance with the stated aims of the Government and The London Plan, and is supported in strategic terms by TfL and the Mayor of London

6.5 On basis of the above, I respectfully request that the appeal is allowed.