

**Appeal against Haringey Council's decision to refuse permission for
London Concrete Limited's Concrete Batching Plant**

at

Ferne Park Depot
Cranford Way
London, N8 9DG.

Application Number HGY/2005/0007

Proof of Evidence

by

Cheryl Yvonne Walton

on behalf of

Parkside Resident's Association

19th November 2005

Contents:

Section 1 Introduction

Section 2 The Application Site & Surroundings

Section 3 Our Objections

Section 4 Recommendations and Conclusions

Appendices

1. Location plan of resident's houses in relation to the planning application.
2. Location plan of bridges in relation to the planning application.
3. Location Plan of the general area which shows all schools, churches etc.

1 Introduction:

- 1.1 My name is Cheryl Yvonne Walton,. I have lived in ---- Road South since 1989. I lived on Endymion Road for 1 year before that.
- 1.2 I represent the Parkside residents association who object to this development proposal.
- 1.3 The residents association was formed in July 2002 and our objectives are to work with the local community, the Council and other resident groups so that we can enhance our residential amenity and promote social inclusion in the well being of the Borough.
- 1.4 The residents association appointed me as their representative and therefore the objections to the application are not mine; they are made on behalf of the residents.
- 1.5 I currently live on one of the streets within the Parkside Resident's Association area. This association covers the streets to the south extreme of the Haringey Ladder. Those streets are Lothair Road South, separated from Lothair Road North by The New River, Coningsby Road, Venetia Road and Tancred Road which run at right angles to Lothair Road North and South, Endymion Road on the top end of Finsbury Park and Alroy Road into which the bottom of Wightman Road runs.
- 1.6 A map of the area identifying the region of Parkside Resident's Association and the application site is given in Appendix 1.
- 1.7 Parkside Resident's Association represents approximately 380 households and approximately 1500 residents, a proportion of who are children. All of these people and households are part of the Haringey Ladder area and are affected by this proposed development.
- 1.8 The numbers of people and households within similar residents associations forming the other parts of the Haringey Ladder and affected by the development are unknown.
- 1.9 The number of those affected in the area immediate to the development is approximately 20,000.

- 1.10 All the streets of Parkside Resident's Association are between the railway line serving routes from Grays to South West London on the North side, Finsbury Park on the South side, Green Lanes on the East side and the main London King's Cross East Coast line and Welwyn to King's Cross line on the West side.
- 1.11 The rear gardens of Lothair Road South and Lothair Road North face directly onto the line serving the local Harringay Green Lanes station.
- 1.12 The rear gardens of Alroy Road to the west face directly onto the line serving local Hornsey & Harringay stations but crucially the main line service into King's Cross.

Structure of Our Evidence

- 1.13 The residents association strongly object to this application as we consider that despite the applicant's assertions to the contrary, we believe that the proposed development will adversely affect our residential amenity, in terms of noise, vibration, traffic generation, air pollution & safety as well as employment & ecology.
- 1.14 The evidence outlines our reasons why, as residents we have come to this conclusion and our evidence is structured in the following format;

Section 2 The Application Site & Surroundings

Section 3 Our objections

Section 4 Recommendations and conclusions

- 1.15 In making these objections, we wish to give our full support to Haringey Borough Council's recommendation to refuse the application & concur with their assessment of the key reasons for refusal.
- 1.16 However, as we are residents, and not professional planning or environmental consultants, we have focused our objections to this development on its adverse impact upon our residential amenity and what we consider to be wasted opportunity for the regeneration of this site in a more sustainable manner.
- 1.17 Our evidence for these objections is primarily observation and perception with reference to policies and other supporting documentation as required.
- 1.18 The adverse impact on our area is indirect.

2 The Application, Site & Surroundings:

Application Site:

- 2.1 The site is situated at the south end of Cranford Way Industrial Estate adjacent to the main King's Cross line serving the East Coast and between the Hornsey and Harringay stations. It is overlooked by neighbouring residences approximately 100m away and is owned by Network Rail.
- 2.2 The area is generally densely residential, surrounded by schools, community centers, trees and green space except where the warehousing and industrial estates are sited to the north end.
- 2.3 The site can only be accessed from Cranford way, off the one way system of Tottenham Lane.
- 2.4 Cranford Way is partly residential with little protection from heavy traffic and Tottenham Lane which joins Church Lane, (to take the one way traffic in the opposite direction to Tottenham Lane), is wholly residential.
- 2.5 The areas around the site are residential and surrounded by trees and green space except where you have the main and local railway lines serving other parts of London and the UK.
- 2.6 Parkside Residents are not in the immediate vicinity of the application site but within the area affected by industrial road and rail movement from the site.

The Planning application:

- 2.7 The proposal is for the construction of a concrete batching plant on the site.
- 2.8 From reading the applicants own supporting material to the application and from looking at the plans in support of the application we note that production will involve delivery of raw materials for batching and then distributing ready mixed dry or wet concrete to customers by a conservative estimate of 50 movements from HGV delivery and an unknown number of vehicle movements from private contract collection.

- 2.9 Some of the dry raw materials for the works are proposed to be delivered by rail (at the discretion of Network Rail and at a time 2 years after construction is finished) and some small number delivered by local roads.
- 2.10 Initially, all stock would leave by local roads in 5 concrete mixer trucks making an estimated 5 deliveries each every day. Some stock would be required to be delivered dry but most would be delivered wet.
- 2.11 10 new employees will be at the plant.
- 2.12 The buildings would total 29m in length by 8m width and 15.5m in height.
- 2.13 The buildings and components are proposed to be covered or enclosed except where they discharge into the delivery trucks.
- 2.14 There are 6 concrete batching plants local to Haringey and a further number throughout the north London area.
- 2.15 Consultation with local residents was limited to the immediate vicinity.
- 2.16 The development that the application is for is an industrial plant.
- 2.17 The proposed activities of this plant are not immediately adjacent to our area but the activities to and from the site will pass directly in front of our houses on the road and behind our gardens by rail. We consider that this brings the development very close to our residences.
- 2.18 The operations are proposed to be 12 hours daily use Monday to Friday 7am – 7pm, 7am – 7pm on Saturdays.
- 2.19 The proposals allow for rail freight 2 years after completion of the site, this is not confirmed, all transport will initially be by road with the possibility of it remaining by road.
- 2.20 LCL have not proven, contrary to their claims, that the proposal is required or of any 'significant benefit' to Haringey.
- 2.21 We note the applicant's allegations that there will be no adverse impact on the environment. Regardless of the technical data submitted, we do not accept this as fact.
- 2.22 The resulting new jobs created from this proposed development are very few. The benefit of the 10 jobs filled by the plant will be directly lost and

unemployment increased by the real threat of 25 jobs lost by adjacent light industrial unit closing because the plant is not compatible with their industrial processes and products.

- 2.23 We believe that other suitable types of business would benefit this area and aid with employment.
- 2.24 We consider this proposal for a concrete batching plant to be completely unsuitable industry for the site and the surrounding area which are predominantly residential.

3 Our Objections

3.1 We would like to bring to the Inspector's attention the following:

This is proposed heavy industrial use, but the site is surrounded by residential uses, community centers, local schools and shops serving the residential community.

The plant will only employ 10 people and none are necessarily from within the borough.

This operation is going to be a 7am – 7pm Monday to Friday & 7am – 7pm on Saturdays operation.

There will be a lot more heavy goods and other associated industrial traffic than at present in addition to more heavy rail freight (if it were implemented). Our issue is primarily with the TYPE of transport affecting us.

London Concrete Limited have recently applied for night works for a plant at Heathrow which is sited approximately 400m away from residences. This will happen at Ferme Park.

Production capacity is only limited to the number of delivery trucks based at the plant. This plant has the potential to increase production by 100%. London Concrete have omitted this consideration in all of their calculations.

The noise survey findings state that the noise will not increase with the introduction of the plant and lorries. Regardless of this, we are concerned that in reality noise levels MUST increase and therefore have to affect the local amenities.

We are concerned that London Concrete Limited are unable to prove that they have planned sensible, suitable and safe road routes for their trucks from the site through our residences as they travel onto to their delivery destinations.

The layout of railways, and weight restricted bridges around the site means that there are poor links from and through this part of the borough. Wightman Road, Alroy Road, Green Lanes, Endymion Road and Turnpike Lane are all traffic bottle necks. The alternatives for domestic traffic are very limited and with weight restriction over the railway lines, the alternatives for HGV are next to none.

The London Concrete Limited's traffic survey carried out regarding the concrete batching plant should have been expanded to include more than the immediate area of Cranford Way.

We are concerned that assessment of the site's suitability for LCL's development is reliant on the accuracy and credibility of details submitted by LCL and that these have not been checked or challenged.

- 3.2 Our objections to the development are therefore based on the following assessment of the adverse impact that we consider the development will have on our residential amenity, in terms of vibration, noise, industrial traffic generation, employment, air pollution, ecology and public safety.

Noise & Vibration associated with on and off site traffic generated by the development:

- 3.3 We are concerned that this development will cause a nuisance impact caused by the increased noise levels in the area. This is a quiet area and any unsuitably heavy industry will fundamentally change this.
- 3.4 We are concerned that the additional industrial traffic by road and rail will cause vibration damage to our streets and surroundings.
- 3.5 We are concerned about the proximity to the residents of the existing rail and roads to be used by this development.
- 3.6 We are concerned about the increased volume of heavy goods type road and heavy rail traffic use resulting from this development.
- 3.7 We are concerned about the creeping impact from this development if demand and therefore production increases. None of the supporting documentation consider variations on any of the estimates.
- 3.8 We are concerned that the figures offered by London Concrete Limited on numbers of vehicles, which is conservatively set at approximately 56 vehicle movements per day, has a greater impact than estimated and this will increase with production at the plant.
- 3.9 We are also concerned that some other smaller collections which would be made directly by LCL customers has not been accurately estimated. Each time any vehicle uses the plant it equals double the vehicle movements. This is an unknown number of vehicle movements per day

and will increase with production at the plant.

- 3.10 Despite supporting documentation to the contrary, we cannot accept that the plant and associated traffic will have no noise affect.
- 3.11 We are concerned that the heavy industrial type road and rail traffic will cause vibration damage and nuisance. The current rail freight using the east coast line is already responsible for vibrating our homes enough to disrupt sleep and cause the surface of a glass of water to be violently disturbed.
- 3.12 We are concerned that London Concrete Limited's proposals do not take into account the 'size' of the private contract vehicles using our streets.
- 3.13 The effects of increased heavy transport will exacerbate the considerable problem with subsidence experienced in this part of Haringey.
- 3.14 The road surfaces in the area are uneven with speed bumps and bridges with weight restrictions on them. These are not suitable for heavy industrial traffic.
- 3.15 We are concerned that the existing roads which cross railway lines and The New River in a number of locations have weight restrictions on them which will be disregarded. The weight restrictions cannot be affectively enforced and will be ignored.
- 3.16 We are concerned that the use of the railways, delayed for 2 years after the development is built, will be given approval with no condition, consideration or understanding of impact because it falls within the parameters of preferred transport.
- 3.17 We are concerned that this lack of investigation into impact from increased rail use in the area and surrounding areas is an irresponsible omission from the surveys.

Increase in dust, pollution and C02 emissions upon adjacent residents:

- 3.18 We are concerned that this development will undo the efforts to improve air quality in the borough as a direct result of increased heavy goods road & rail traffic and resulting stationary road traffic.
- 3.19 We are concerned that the dust generated by this development does not take into account the amount of dry batching at the plant and

- transportation of dry materials to and from the plant. This has not been quantified or considered.
- 3.20 We are concerned about the general added emissions and resulting air pollution that will be caused by the operations, road deliveries, rail deliveries, lorry distribution and mixer truck distribution exhaust fumes.
 - 3.21 No account has been taken of impact from private contractors collecting from the plant.
 - 3.22 No account has been taken of the resulting spillage from trucks.
 - 3.23 We are concerned about the proximity to our community schools and community facilities of this development.
 - 3.24 Finsbury Park is currently used for concerts which generates welcome funding for the borough, no doubt this will be affected by the dust, congestion and pollution generated by the plant. The park is surrounded on all sides by rail or road.
 - 3.25 We are concerned that the additional industrial traffic generated by this development will affect health, safety and the quality of the environment.
 - 3.26 We are concerned about the potential health issues and the further strain that the dust and pollution from this development will impose on our health system.
 - 3.27 We are concerned that the transportation of the raw materials and finished product is in very close proximity to our households.
 - 3.28 Spillage from London Concrete Limited's trucks and private contractors from wet or dry mix leaving the site has not been considered and will not be controllable. It will increase levels of dust on the surrounding roads and railways. This will also get into the drainage system causing blockages and may also result in flooding.
 - 3.29 London Concrete Limited do not take into account spillage from other trucks being used by private contractors over who they have no control.
 - 3.30 This proposal and the resulting pollution takes no account of Haringey being designated as an air quality management area.

Adverse impact on the residential character of the area:

- 3.31 We are concerned that the nature of this particular development is incongruous and totally out of keeping with the residential character and local architecture and history of the area.
- 3.32 We are concerned that the styling is not in keeping with any contemporary developments in the area and has no design merit.
- 3.33 We are concerned that this development is in such close proximity to the rejuvenation work at Finsbury Park, the New River Walk, Railway Banks & residences that it is in direct conflict.
- 3.34 We are concerned that this development will detract from and cause disruption to our community and amenity.
- 3.35 We are concerned that this development will have an impact on the general quality of life in our neighbourhood that it is not beneficial to and will not enhance the area in any way.
- 3.36 The existing industrial occupants at the site are not incompatible with the surrounding residences and the introduction of a further similar industry at this site is not necessarily a detrimental change. The aggressive nature of concrete batching would seem to be in direct conflict with residents and existing users of the Ferme Park Depot & will affect business amenity as well as residents.
- 3.37 There will be a general adverse affect on the area from any addition of HGV traffic with material impact on the road surfaces. This will generate additional maintenance and therefore disruption.
- 3.38 LCLs claim that the plant would reduce HGV movement in the area is impossible. We do not experience HGV movements with the possible exception of 1 or 2 isolated occasions. We could accept this claim if it referred to reduced HGV movement in other boroughs which supply concrete currently and would benefit from another plant elsewhere.

Limited contribution to employment of the area:

- 3.39 We are concerned that this plant will have a commercial impact and will prevent other more suitable developments being attracted to the area, therefore affecting employment.

- 3.40 We believe that other, more suitable types of business would benefit this area and aid with employment.
- 3.41 We are concerned that the borough's existing social issues will be compounded by the introduction of heavy industry to the area by changing the local profile.
- 3.42 We believe that existing businesses have moved from the depot since the LCL application was originally made and others are threatening to do so. It would seem to be affecting the appeal of the site to other suitable businesses. The businesses that would occupy the site if LCL were not there will now take their business and local employment prospects into another borough.
- 3.43 Consideration should be given to the requirements of these existing tenants who offer local employment and in greater numbers than offered by LCL's proposals.

Impact on ecology and loss of open space:

- 3.44 We are concerned that this development will undo the efforts to improve the local facilities in the borough such as the parks, railway bank ecology and river walk particularly.
- 3.45 We are concerned that that this development will contribute to the general reduction in our green spaces.
- 3.46 The increased noise and vibration from the plant and traffic will impact on local wildlife.
- 3.47 The increased dust and pollution from added rail traffic will impact on local wildlife especially along the 'corridor' of the railway embankments.
- 3.48 The building of the batching plant would mean enormous disruption and associated irritations. It will also mean the removal of trees and shrubs.
- 3.49 The wet waste at the plant is to be addressed with settlement. The resulting waste will be removed by specialist contractor. We are concerned that overspill will cause damage from to the surrounding green space.
- 3.50 We are concerned that there will be an impact on local nature especially protected or unusual species such as bats and black redstarts regardless

of the findings of surveys produced by London Concrete Limited.

- 3.51 We are concerned that the resulting assessment of the overall situation regarding wildlife and environment totally disregard local observation.
- 3.52 The work by Thames Water to create a 28 mile link path from Hertfordshire into Urban London along the 400 year old New River was only finished in 2004. It was a £2m project taking 10 years or so specifically to attract walkers, other users and provide a vital area of accessible green space. This work is the winner of the 2004 Green Apple Gold Award in recognition of its environmental best practice. The New River passes by the site of the Application and will form a water borne distributor of the pollution and dust created around the Site. The New River passes through 5 other boroughs.
- 3.53 Concrete is not a sustainable building material and should not be considered as an appropriate industry in an area concerned with conservation and.
- 3.54 The ecological corridor of the railway line embankments will be fragmented through damage by the aggressive manner of heavy industry even if the building of the development doesn't cause a actual break in the corridor.

Alternative site assessment:

- 3.55 We do not understand why this site has to be developed for such an environmentally damaging facility and see no evidence from London Concrete Limited that they have considered alternative sites. There are other locations which are less environmentally sensitive but London Concrete Limited have failed to undertake assessment of such. There must be a number of other sites in the Thames Gateway with rail and/or river connections that can transport materials in and out of a plant without impact on residences.
- 3.56 We are not aware of any other sites that the applicants have rigorously assessed before coming to the conclusion that this is the only suitable site in North London that meets their and the areas needs.
- 3.57 We consider that this should have been undertaken and we also consider that there must be other more sustainable sites that can accommodate the proposed use without an adverse impact upon residential amenity.

- 3.58 We understand that there is no need for this industry in Haringey for the purposes of serving local construction.
- 3.59 We also consider that there are more sustainable uses for the application site.
- 3.60 We do not object to the site being developed if it were a mix of offices, light industry but any heavy industrial development should be kept away from residences.
- 3.61 This is an inappropriately unique industry type in comparison with neighbouring industries on the site.

Public Safety:

- 3.62 We are concerned that the additional traffic generated by the development will make our streets less safe for children, pedestrians & cyclists.
- 3.63 The impact on our open air sporting and exercise facilities is unknown.
- 3.64 Finsbury Park is currently undergoing heritage lottery funded works to reinstate it to it's former glory. This includes with new basket ball courts, tennis courts and facilities for local use. This will be affected by the noise, dust and pollution generated by the trains from the main King's Cross to East Coast line which follows the west boundary of Finsbury Park as well as the additional HGV traffic that follows its boundary.
- 3.65 The heavy goods traffic generated by the development, effectively introduces a hazard of our streets which is incompatible with the Borough's and the Council's objectives of promoting safe streets for pedestrians and cyclists.
- 3.66 HGVs and trucks will use our streets and speed along our roads to meet deadlines which will increase the risk to public safety.
- 3.67 London Concrete Limited do not take into account the likelihood of most road deliveries will be required by customers between 7am and 9am to suit construction sites. These times will conflict with school runs and one the busy parts of the day for people traveling to work and is not safe. Walkers and cyclists are likely to revert to car use as a result.

4 Recommendations and Conclusions:

4.1 On behalf of the Parkside Residents Association, we request that the Inspector dismisses the appeal and refuses to grant planning permission.

4.2 Our reasons for coming to this conclusion are:

4.3 There will be an adverse impact upon residential amenity in terms of

Noise (see paragraphs 3.3 – 3.17)

Dust and air pollution (see paragraphs 3.18 - 3.30)

Residential character of the area (see paragraphs 3.31 – 3.38)

Employment (see paragraphs 3.39 – 3.43)

Ecology (see paragraphs 3.44 – 3.54)

Public safety (see paragraphs 3.62 – 3.67)

4.4 We also consider that the applicants have failed to undertake an assessment of why the application site is sustainable for this sought land use.

4.5 There is no environmental assessment of alternative sites or an assessment of the site's sustainability for this use and the socio economic benefits of the development – which as far as we can tell are non existent given the few jobs that are to be created by the development.(see paragraphs 3.55 – 3.61) of my evidence).

4.6 We are concerned that this technical information cannot appropriately support the reasoning behind the application and therefore the reasoning behind the appeal. We do not believe that the correct methodology has been employed by London Concrete Limited to support the application or the appeal.

4.7 If this development is allowed to take place, it is unlikely that further, similar developments can be prevented. This means it will be impossible to protect the existing environment and character of the area from additional and similarly inappropriate developments.

4.8 We consider that the proposed development represents a loss opportunity if permission is granted because we consider that there are more sustainable uses of the land that can create greater community benefits.

4.9 The pieces of technical information submitted by London Concrete Limited in support of this development appear to be deliberately vague and provide only a restricted and misleading view. They refuse to provide the

figures upon which these submissions are based which we suspect have been averaged in London Concrete Limited's favour.

- 4.10 There is no reference in the technical information to areas other than immediately surrounding the plant.
- 4.11 We are concerned that the technical information is not broad enough in spectrum to provide a balanced, accurate and scientific assessment of the affect this batching plant will have on the 'area'.
- 4.12 We are concerned that the residents immediately adjacent to the plant and in the surrounding area who are unanimously against this development have not been considered by London Concrete Limited.
- 4.13 In light of our assessment we consider that the proposed development is contrary to the following policies of the adopted Haringey Unitary Development Plan & Policies.
- 4.14 We would not consider any conditions being imposed on the development as ineffective as LCL have already been found to fail on conditions imposed at another site for dust suppression. This results in fines but no real solution to the problem.
- 4.15 We therefore agree and support the Council's assessment that planning permission ought be refused.
- 4.16 We therefore request that the Inspector dismiss the appeal.
- 4.17 Refused permission for this plant will not prevent London Concrete Limited from supplying concrete.