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31 August 2005

Mr Paul Tomkins
Head of Development Control (West)
Haringey Council
Environmental Services
639 High Road
Tottenham
London
N17 8BD

Your ref: HGY/2004/1265 & HGY/2005/0007
Our ref: 206420

Dear Mr Tomkins

PLANNING APPLICATIONS HGY/2004/1265 AND HGY/2005/0007, DEVELOPMENT OF CONCRETE BATCHING PLANT, FERME PARK DEPOT, HORNSEY N8

Introduction

Thank you for commissioning us to comment on the transport issues surrounding the above planning applications. This letter presents our comments on these issues and some suggestions for you to consider.

We have based our comments on a review of the following documents:

- Proposed Concrete Batching Plant at Ferme Park, Cranford Way, Hornsey, Transport Assessment, Bellamy Roberts, April 2003 and Summary of Transport Assessment, Bellamy Roberts, July 2005.
- Ferme Park, Cranford Way, Hornsey, Report Accompanying Planning Application by London Concrete Ltd, Firstplan Ltd, December 2003.
- Extracts from Planning Application for Concrete Batching Plant, Ferme Park Depot, Cranford Way, Hornsey, Application no HGY/2004/1265, Statement of Objections by Green N8 Residents Group, 8 September 2004.

After reviewing these documents, we have identified a number of areas where we think it would be useful to seek clarification from the applicant or apply as conditions to any planning consent. We have grouped these areas into the following four headings:

- Traffic generation of the proposed plant.
- Impact of traffic generated.
- Railway operations.
- Highway access arrangements.

We summarise our thoughts under these four headings in turn below. We then comment on the issues raised in the 'Green N8 Residents Group' document, before presenting a summary of the further information requested and potential conditions that could be applied to any planning consent for the proposed plant.

Traffic generation of the proposed plant

The predicted traffic generation of the proposed plant is set out in section 5 of the Transport Assessment. Traffic is predicted to be generated by three activities:

- Deliveries of concrete from the plant, made by five mixer trucks envisaged to be based at the plant. Each truck is expected to make five deliveries per day giving rise to 50 mixer truck movements per day (25 from the plant, 25 returning to it).
- Deliveries of cement by articulated tanker. It is envisaged that there will be two or three deliveries of cement per day, resulting in four or six articulated truck movements per day.
- Staff working at the plant. The plant will provide 12 jobs, including the five mixer truck drivers. The Transport Assessment states that the employees will likely give rise to 20 car movements over a typical day.

No independent observations have been provided in the Transport Assessment to allow us to verify the above predictions. Furthermore, no information is presented to specify the opening hours or the capacity of the proposed plant. In the absence of that information, we cannot yet conclude that the above traffic generation predictions are accurate. Hence we recommend that you seek clarification of these details from the applicant and carry out independent observations of traffic generation at a comparable site.

These observations will allow the predicted traffic generation of the proposed plant to be verified (or otherwise) and may alter the scope of the resulting Transport Assessment and its conclusions. In the absence of those observations, however, we comment below on a number of issues raised in the Transport Assessment based on the information therein.

Impact of traffic generated

Predicted increases in traffic

The Transport Assessment compares the predictions of traffic generated by the proposed plant to surveys of existing traffic flows on Cranford Way and Tottenham Lane.

The comparison is made by comparing flows recorded over twelve hours (07:00 – 19:00) and assuming that traffic generated by the proposed plant is spread evenly throughout this period. The validity of this assumption can be checked against the observations of the traffic generated at an agreed comparable site, as suggested above.

In the absence of these observations however, we comment below on the amount and impact of traffic generated by the proposed plant, based on the unverified predictions presented in the Transport Assessment.

We summarised in the previous section of this letter the predicted traffic generation of the proposed plant (76 vehicle movements spread over the period 07:00 – 19:00, of which 20 would be cars and the remainder HGVs). The Transport Assessment presents results taken from a classified turning count at the junction of Tottenham Lane and Cranford Way for the period 07:00 – 19:00. Using the data in that traffic count, these additional 20 cars and 56 HGVs represent an:

- increase of 7% in the total number of vehicles turning left from Cranford Way into Tottenham Lane and an increase of 18% in the number of HGVs making that movement.
- increase of 9% in the total number of vehicles turning left from Tottenham Lane into Cranford Way and an increase of 25% in the number of HGVs making that movement.

The Transport Assessment also presents results of a traffic survey undertaken on Cranford Way, south of the buildings occupied by a food processing company. Comparing the predicted traffic generation of 76 vehicles to the observed traffic flows over the period 07:00 – 19:00 shows:

- a predicted increase of 11% in the total number of vehicles.
- a predicted increase of 38% in the total number of HGVs.

Significance of predicted increases

A typical criterion for deciding if an increase in traffic at a junction warrants further investigation is to assess if the increase in vehicles at a junction is greater than around 5% to 10%. This criterion is usually applied to decide whether or not to proceed with a detailed capacity assessment of the operation of the junction (or junctions) predicted to experience the increase in traffic.

We note that a capacity assessment has been carried out of the operation of the Tottenham Lane and Cranford Way junction, referred to in paragraphs 5.8 and 5.9 of the Summary Transport Assessment. This predicts that the junction of Tottenham Lane and Cranford Way will operate with substantial spare capacity even including for traffic generated by the proposed plant.

We have not been provided with this capacity analysis, but assuming it to be reasonable (and the results would appear to be in accordance with what one would expect given the levels of traffic flow) it would appear from the quoted results that the additional traffic generated by the proposed plant will have a negligible impact of the operation of the junction.

We note that the traffic count at the junction of Tottenham Lane and Cranford Way shows a total flow on 6,794 vehicles on Tottenham Lane west of Cranford Way during the period 07:00 – 19:00. The proposed plant is predicted to add 38 vehicles to this flow, resulting in an increase of less than 1%. It is not uncommon for traffic levels on any particular section of road to vary by about 5% to 10% purely as a result of day-to-day fluctuations. Hence the predicted increase in traffic due to the proposed plant will be well within the range of day-to-day variability in traffic flow experienced on this section of Tottenham Lane.

We have also inspected traffic data for the junction of Tottenham Lane and Church Lane and reach a similar conclusion for this junction too. The traffic data covered the period 07:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00. Inspection of that data showed that around 2,500 vehicles were passing through the junction during a typical hour. Even if all 76 vehicles predicted to be generated by the proposed plant during the day passed through the junction in that one hour, this would still represent an increase of less than 5%. Hence we conclude that – on traffic operational grounds – further assessment of the junction of Tottenham Lane and Church Lane is unwarranted.

Criteria for assessing the environmental significance of an increase in traffic are presented in 'Guidelines for the Environmental Assessment of Road Traffic' published by the Institute of Environmental Assessment. These criteria help an assessor to decide if a predicted increase in traffic is worthy of detailed assessment or can be 'screened out'. The criteria are:

- *"include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).*
- *"include any other specifically sensitive areas where traffic flows have increased by 10% or more."*

The predicted increase of 38% in the number of HGVs on Cranford Way south of the food processing plant would appear to be sufficient to warrant further investigation of the potential environmental impacts. We note that Firstplan's report states that there are independent assessments dealing with the issues of noise, dust and ecology.

We have not seen these reports and hence are not in a position to review and comment upon their conclusions. We suggest, however, that it falls within the scope of these reports to assess the impacts of the increase in HGVs on Cranford Way (and any other locations considered worthy of assessment (which may include the junction of Tottenham Lane and Church Lane for example)).

Notwithstanding the above comments, we think there would be merit in the relevant planning committee members making a site visit to a comparable concrete batching plant. This would allow the members to observe the volume of traffic generated by a comparable operation and allow them to form their own opinion on the significance and effects of this traffic.

Railway operations

The traffic generation predictions for the proposed plant rest upon aggregate being delivered to the plant by rail. If it proved infeasible to deliver the required amount of aggregate to the plant by rail and the aggregate had to be delivered by road instead, then this would increase the number of vehicles to and from the proposed plant.

The information provided to us in respect of the application does not include any correspondence from Network Rail or a railfreight operator (or both) stating that they consider it feasible to supply aggregate to the plant by rail. While the absence of such information does not, of course, mean that the proposed operations are infeasible, it would be comforting to know that the operations are feasible before determining the planning application.

We suggest that you consider making it a condition of any planning consent that the proposed plant cannot be opened until confirmation is received from the appropriate authorities that aggregate will be delivered to the plant by rail.

Similarly, no information has been provided by the applicant regarding the times of the day when deliveries of aggregate by rail will occur. To a large extent, delivery times will be dictated by the availability of suitable paths on the rail network. Again, we suggest that you consider making it a condition of any planning consent that all rail deliveries are to occur within a certain period – likely to be the opening times of the plant.

Highway access arrangements

The activities at the proposed plant will result in an increase in the number of articulated lorries entering and leaving the site through the junction of Cranford Way and Tottenham Lane.

We have observed that the presence of parked cars on Tottenham Lane can restrict the space available for articulated lorries to manoeuvre into and out of Cranford Way. We suggest that you consider requesting that the applicant carries out a swept path analysis of the movements between Tottenham Lane and Cranford Way to determine if the presence of parked cars makes it difficult for articulated trucks to manoeuvre.

We also suggest that the operator of the proposed plant employs suitable wheel washing and dust suppression techniques to ensure that concrete debris and dust are not deposited on the public highways.

We have also observed that the southern end of Cranford Way is occasionally blocked to through traffic by parked lorries. We appreciate that this does not form part of the public highway, but we recommend you consider seeking assurance from the applicant that the access to the proposed plant will remain useable at all times.

Issues raised in the 'Green N8 Residents Group' document

The 'Green N8 Residents Group' has produced a critique of documents submitted in respect of the planning application. We have reviewed the Group's comments and summarise our response to these comments below; in doing so, we have used the same main headings as in the Group's document.

The market for ready-mixed concrete in Haringey

In this section of their document, the Group presents a number of arguments relating to the distance over which concrete can be realistically transported. The Group's arguments lead to a conclusion that the demand for concrete in the area to be served by the proposed plant can be served by existing concrete batching plants.

While this may well be the case, a contrary view would be that the financial viability of the proposed plant is a matter solely for the operator to decide based upon their judgement of the likely market. We suggest that it would be for Haringey Council to consider whether or not the financial viability of the proposed plant represents a material consideration in determining the planning application.

Also under this heading, the group challenges the claim made in the Firstplan report that "*HGV movements in Haringey will be reduced.*" The validity of this claim depends on how the ready-mixed concrete market in Haringey responds to the additional capacity provided by the proposed plant.

If one assumes that the demand for concrete in Haringey is constant, then an increase in supply would – all other things being equal – lead to the existing suppliers losing market share at the expense of the operator of the proposed plant. In this situation, the number of mixer trucks on the roads in Haringey would be constant, since the demand for concrete has remained constant and all that's changed is the proportion of the market served by each plant.

The total number of aggregate-delivery trucks on the roads in London would fall slightly in this situation. This would be because the proposed plant would be served by rail, whereas four of this six competing plants (listed in paragraph 9.3 of the Firstplan report) are served by road. Since any market share of the proposed plant will be gained at the expense of one of the six competing plants, the demand for concrete at these six will reduce with – in theory – a corresponding reduction in the number of vehicles delivering aggregate. (Although we accept the Group's point that this reduction may not be experienced in Haringey, but in neighbouring boroughs.)

We accept, however, that if the proposed plant results in an increase in demand for concrete in Haringey then this will likely result in a increase in the number of concrete-related trucks on the roads in Haringey.

Resolving this argument rests upon an economic analysis of the market for concrete in Haringey and how it may respond to the additional capacity provided by the proposed plant (whether the demand increases or remains constant). This is not a matter that is covered in any of the documents supplied to us, although it may be covered in other documents relating to the planning application. However, we return to the point we made earlier in this section – it is for Haringey Council to decide if the debate regarding the economic viability of the plant represents a material consideration in determining the planning application.

Finally in this section, we note the Group claims "*Furthermore, that figure* [the expected generation of HGV's] *will very likely be exceeded as London concrete expects to sell ready-mix to customers who collect.*" While we agree that such activity would indeed increase the traffic generation of HGV's above that stated in the Transport Assessment, after inspection of the documents supplied to us we cannot find any reference to the operator proposing to sell concrete to customers for self-collection.

We appreciate, however, that that's not to say it would not happen and if it did it would invalidate the traffic generation calculations presented in the Transport Assessment. This issue can be assessed upon receipt of the observations of traffic generation at a comparable plant, since the observations could also note instances of third-party vehicles arriving at and departing from the site.

Analysis of Bellamy Roberts transport assessment report – volume of traffic movements

This section of the Group's response starts by querying the Transport Assessment's statement that the operation of the proposed plant will require *"two or three deliveries (4-6 movements) per day for cement"*. The Group notes that ready-mixed concrete is made with a ratio of cement to aggregate of 5:1. The Firstplan report notes that a train will deliver 1,350 tonnes of aggregate to the proposed plant two or three times a week, resulting in up to 4,050 tonnes of aggregate being delivered each week.

The Group then applies the 5:1 ratio to this amount of aggregate, resulting in a predicted requirement of 810 tonnes of cement each week, translating into six cement deliveries each day (assuming five working days available for deliveries and 27 tonnes of cement per truck).

While we can find no fault with the Group's reasoning here, we note that the Transport Assessment states that the plant will require only around 100,000 tonnes of aggregate each year. This translates to a little over 1,900 tonnes of aggregate being delivered each week and to three cement deliveries each day (using the same assumptions as above).

Hence we conclude that the Transport Assessment's statement of *"two or three deliveries (4-6 movements) per day for cement"* is correct based upon deliveries being made by 27-tonne trucks and the plant consuming 100,000 tonnes of aggregate annually. We also conclude, however, that the Transport Assessment's statement is contradicted by the weekly aggregate delivery

figure stated in the Firstplan report. The difference between the two figures results in a doubling of the number of trucks required to deliver cement to the proposed plant – from three to six.

We discussed earlier in this letter whether or not such figures represented a significant increase in traffic. We don't wish to revisit that argument, but suggest that Haringey Council notes the relationship between the amount of aggregate delivered and the resulting number of cement delivery trucks required. We also suggest that Haringey Council seeks clarification on the likely amount of aggregate required by the plant and resulting annual capacity of the concrete-manufacturing process.

The Group then goes on to calculate percentage increases in trucks at points on Cranford Way and Tottenham Lane. The Group calculates relatively high percentage increases in HGVs by comparing only particular classes of HGVs. The 'Guidelines for the Environmental Assessment of Road Traffic' document does not draw a distinction between different types of HGVs, though there may be a case for drawing such a distinction when considering the noise and air pollution impacts. We cannot confirm this without reference to the reports on these topics, but would imagine that the authors of these reports have applied appropriate methods to adequately assess these impacts.

Impact of HGV traffic on road; impact on railway noise levels

In this section of the Group's response they comment on the potential for trucks generated by the proposed plant to damage the surface of Cranford Way, Tottenham Lane, Church Lane, Wightman Road and Turnpike Lane.

To the best of our understanding, Cranford Way is a private road and hence does not fall under the jurisdiction of Haringey Council. Hence any potential for damage to Cranford Way's surface as a result of the proposed development is unlikely to be a material consideration in Haringey Council's consideration of the planning application.

The other roads mentioned by the Group are, however, under the jurisdiction of Haringey Council and we suggest that an appropriate officer considers the potential for damage to the surface of these roads as a result of the traffic generated by the proposed plant.

Noise pollution from railway rolling stock

In this section of their document, the Group expresses concerns about the increase in noise suffered by local residents as a result of railway operations related to the proposed development. The response focuses on the potential nuisance this noise would cause at night.

We agree with the Group's concerns regarding the potential for night time nuisance and note that one of the conditions we suggested earlier in this letter was to limit the hours during which deliveries of aggregate to the proposed plant can occur.

Impact on non-car means of transport and public transport

This section of the Group's document comments on the potential impact of the traffic generated by the proposed plant on bus services, walkers and cyclists in the vicinity of the proposed plant.

Our view, however, is that the amount of traffic predicted to be generated is likely to be within the daily variation of traffic levels already on the roads concerned and should not have an impact on the reliability of bus services in the area; subject, of course, to the amount of traffic generated being as predicted in the Transport Assessment.

Transport policy issues

The transport section of the Group's document concludes with an appraisal of the proposed development's degree of compliance with a number of transport-related policies. The thrust of the Group's argument in this area is that the proposed development contravenes a number of relevant policies because of its predicted environmental impact.

We note that the planning application has been accompanied by specialist reports on noise, dust and ecological issues. We have not seen these documents and hence can't comment on their contents and conclusions, but consider that these would be the best documents to comment upon the degree of compliance between the proposed development and the environmental aspects of the transport-related policies quoted in the Group's document.

Summary of further information required and potential planning consent conditions

Further information

We suggest that you seek further information from the applicant on the opening times and capacity of the proposed plant. We also suggest that you seek confirmation from the applicant that the required amount of aggregate will be delivered by rail to the proposed plant. Finally, we suggest that you request the applicant to undertake a swept path assessment of the movement of an appropriate vehicle from Tottenham Lane to Cranford Way (and in the opposite direction).

We suggest that Haringey Council carries out traffic generation surveys at a similar plant to allow a comparison to be made with the traffic generation predictions for the proposed plant. We also suggest that Haringey Council considers taking relevant committee members on a site visit to a comparable plant to allow them to form an opinion on the significance of the traffic generated by the proposed plant. Finally, we suggest that an appropriate officer in the Council considers Green N8's claim regarding the potential for damage to the surface of Tottenham Lane.

Potential conditions

We have identified above a number of potential conditions that could be applied to any planning consent. We suggest that you give consideration to amalgamating these potential conditions into:

- A restriction ensuring that the plant cannot be operated until agreement has been reached with the relevant authorities and operators for deliveries of aggregate to the proposed plant by rail.
- A traffic management plan to be submitted by the applicants be required to the agreement of Haringey Council prior to the commencement of operations at the proposed plant. This would cover hours of operation, management of vehicles on-site, agreed off-site vehicle routes, cleaning facilities and any other issue the Council considers relevant. The plan could also contain a monitoring regime, allowing the Council to issue enforcement notices should it deem them necessary.

I trust that the above is of use to you and has helped you progress your consideration of the planning application. Should you wish to discuss any aspect of the above further, please do not hesitate to contact me.

Yours sincerely

I Lamb

Iain Lamb
Principal Consultant

Spoke to Iain Lamb on tel. He confirmed that, from traffic flow figures provided by Hyderways, the additional vehicle movements arising from the plant would be too small to affect capacity at Tottenham Lane / Church Lane junctions. % increase in total volume of traffic very less than 10%.

DJ 31/8. 1/9.