GreenN8

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

www.GreenN8.org

8 SEPTEMBER 2004

1.0 INTRODUCTION

1.1 This document sets out objections, by a Crouch End residents group, to the planning application by London Concrete for a concrete batching plant at the Cranford Way Industrial Estate in Hornsey.

1.2 The report identifies and assesses the key potential impacts of this proposal on the local area and the environment, and comments on the adequacy of documents submitted by the applicant in support of the planning application. Conflicts between the effects of the proposed development and relevant policies in the Haringey Unitary Development Plan (UDP) and national planning policy guidance are also highlighted.

1.3 This objection document is set out as follows:

- Section 2 describes the characteristics of the site and its surroundings;
- Section 3 summarises the planning policy context for the site;
- Section 4 considers impacts on nature conservation;
- Section 5 examines transportation issues and likely traffic impacts;
- Section 6 considers impacts on noise;
- Section 6 assesses likely impacts on air quality and health;
- Section 7 contains information on London Concrete's approach to concrete plants elsewhere in the UK;
- Without prejudice to these objections, Section 8 sets out planning conditions and planning obligations that should be attached in the event that planning permission is granted for this proposal;
- Overall conclusions are contained in Section 9.

2.0 THE APPLICATION SITE

2.1 This section identifies the location and characteristics of the depot site and its immediate surroundings, as well as the accessibility of this location.

2.2 The application site is understood to comprise some 1.2 hectares and is located within the 9.1 hectare Cranford Way Industrial Estate, within the Hornsey Vale/Crouch End area of Haringey. This industrial estate lies immediately east of a main railway line and railway sidings. The London Concrete application site lies at the south western end of this estate adjoining the railway sidings.

2.3 The Cranford Way industrial estate contains mainly storage and distribution businesses occupying large warehouse type buildings. It is served by a circular estate road with access off Tottenham Lane (A103). There are very few purely industrial operations within this estate, and several of the occupiers are involved with the storage or distribution of food products, such as meat storage and bakery supplies.

2.4 Immediately adjoining the application site lies a building occupied by a building materials supplier while BPF wholesale, a bakery ingredients distributor, lies then 100 metres to the north. An area of open green space of nature conservation importance lies south of the application site.

2.5 Apart from the railway lines to the east, the area surrounding this industrial estate is predominantly residential in character. The rear gardens of dwellings on Uplands Road lie immediately to the west of the application site, while Chettle Court, a 5 storey block of flats, sits on top of a high embankment approximately 80 metres to the south of the site. Within the Chettle Court area, a children's playground and basketball court lie between the flats and the application site. Some 200 metres or more to the east, across the railway tracks and sidings, lie dwellings on Wightman Road and the Haringey ladder.

2.6 Hornsey School for Girls (a 1,300 pupil secondary school) lies on Inderwick Road some 250 metres to the north west, while Weston Park primary school and Stationers Park open space and children's playground are located on Denton Road, some 170 metres to the west of the application site.

2.7 Tottenham Lane, which provides the only access point to the industrial estate, is a one way road, sharply curving at this point, and heavily parked on both sides. It experiences reasonable levels of traffic throughout the day, but is congested at the morning and evening peak periods. From observation, manoeuvring of large trucks accessing or exiting the industrial estate, contributes to this peak time congestion. Trucks exiting the estate either travel south along Tottenham Lane towards the centre of Crouch End, or turn sharply on to Church Lane, which is itself congested in the morning peak period. Road traffic within the estate itself does not appear heavy during other periods of the day.

NATURE CONSERVATION ISSUES

2.8 This Chapter deals with the nature conservation effects of the proposed concrete batching plant. It examines and evaluates the findings of the Ecological Appraisal of Ferme Park, Hornsey as carried out by Cresswell Associates for London Concrete, and submitted as part of the planning application.

2.9 This Chapter first highlights those policies of Haringey Council, which demonstrate its support for the protection of open spaces and biodiversity in the Borough and its commitment to protecting and improving the quality of life and the environment of its residents. These are best expressed and largely contained within the following documents. The extent to which the proposals comply with these policy documents is then assessed.

1) Haringey Draft Unitary Development Plan (UDP) –1st Deposit Consultation September 2003
2) Haringey Biodiversity Action Plan (BAP) (Consultation draft September 2002)
3) 'Better Haringey' programme
4) Local Agenda 21
5) Best Value Action Plan (Planning, Environmental Policy & Performance Business Plan Summary 2004-2007)

2.10 This is followed by a critique of the findings of the desk research and field study carried out by Cresswell Associates on behalf of the applicant, and comparing these with actual and anecdotal findings of local residents and other professional bodies.

2.11 Finally, information is provided to demonstrate that granting planning permission for a concrete batching plant with associated hoppers, conveyors and ancillary facilities will be detrimental to the ecology of the area and that this is not consistent with stated policies on the environment found in the five Council documents listed above.

2.12 It is highly significant that the proposed application site is adjacent to land designated in schedule 11 of Haringey's UDP as an area of local borough importance for nature conservation, known as the Stroud Green Railway Bank. As is shown later, not even the Cresswell Associates environmental report commissioned by the applicant contests that the proposed development would diminish the integrity of the area.

2.13 However, the full impact of the proposals cannot be known from the information currently provided, as there is neither an up-to-date species list nor bat roost survey in existence for the area.

Haringey Council's Policies on Open Space and the Environment

The Haringey UDP

2.14 The stated vision for this plan is that:

> "*The borough becomes a high quality environment where all can prosper and enjoy a good quality of life and where there is choice and quality in the services and opportunities that the borough can provide."*

2.15 Many of the various strategic policies contained within the UDP seek to bring about improvements to the existing environment by decreasing pollution, protecting open space and developing out grime initiatives.

2.16 In the Part 1 introduction, the Council says that "*sustainable development can be defined as ensuring a better quality of life for all, both now and for generations to come."* (Strategy for the UDP. Sustainable Development para. 3.1)

2.17 Within Policy G6 there is a stated objective to ensure that "*flora and fauna in the borough is protected and encouraged, and that the provision helps to meet the aims of the Biodiversity Action Plan"* (Open Space objective 16 para. 3.11)

2.18 In Policy G10, the Council discusses its priority areas in the borough and defines priorities for the Western Area of Haringey, in which the proposed concrete factory would be sited:

> "*The Western Area in contrast to the other two areas does not suffer from deprivation or population transience. West Haringey is a predominantly residential area with the borough's heaviest concentration of conservation areas. The priorities in this area are ones of environmental management, improving the quality of life and its environmental assets such as its attractive open spaces." (Western Area para. 3.23)*

2.19 It goes on: *"The main objectives for the Western area over the plan period are:*

- *Environmental management/creating an attractive sustainable environment.*
- *Identifying development opportunities*
- *Supporting the town centres of Muswell Hill and Crouch End*
- *Supporting shopping facilities in Highgate and on Archway Road*
- *Protecting the area's heritage/ green spaces*
- *Identifying the appropriate scale of development*

2.20 The core UDP policies are contained in Part 2 and Chapter 8 is particularly pertinent as it specifically discusses the issue of Open Space (OS).

2.21 Furthermore, schedule 11 of the UDP – 'Ecologically Valuable Sites' lists Stroud Green Railway Bank as a Site of Local Borough Importance. As the application site lies adjacent to this designated area of nature conservation importance, several sections within this chapter can be applied. It is worthwhile to highlighting these as follows:

2.22 Policy OS5 '*Ecologically valuable sites and their corridors'* states that:

"*Councils will not permit development on or adjacent to Sites of Special Scientific Interest (SSI's)……or other sites of nature conservation value or ecological importance unless there will be no adverse effect on the value of the site for nature conservation caused by the development and its subsequent land use.*

"Ecological corridors form important links between the nature conservation sites identified on the Proposals Map. Wherever possible, the continuity of these corridors should be protected and their green nature enhanced in order that they do not become fragmented and thereby diminish their ecological value." (para. 8.18)
"The ecologically designated areas of the borough make an important and a positive contribution to the diversity and richness of Haringey's flora and fauna. It is important that this diversity is protected and, where appropriate, enhanced in order to provide a rich and varied landscape and ecological foundation to Haringey." (para. 8.19)

"An ecologically valuable site is one where it is deemed that there is sufficient flora/ and or fauna present for the site to be afforded some form of protection in order to protect this flora/ and or fauna." (para.8.20)

2.23 UDP Policy OS15 aims to protect Green Chains. The designated development site, occupying as it does, land adjacent to the Stroud Green Railway Bank and the trackside between Haringey and Hornsey, is designated as an ecological corridor clearly and effectively constitutes a green chain, allowing the safe movement of species from one part of their habitat to another. The Policy makes clear that:

"Development will only be allowed where it will not result in a break up of existing Green Chains for the public or inhibit their provision or extensions. All opportunities will be taken to consolidate and strengthen chains, and where appropriate, to add to chains, or to link them to existing open space in order to improve accessibility to that open space." (para. 8.51).

"The value of Green Chains…….they provide a valuable link between connected open space, and their protection will enable breaks in the built-up environment to be maintained securing a positive visual contribution and variety to the borough."

Haringey's (draft) Biodiversity Action Plan (BAP)

2.24 The issue of Bio-diversity in the Borough is often referred to and touched upon in the UDP document, but is addressed directly and fully in Haringey's draft Biodiversity Action Plan.

2.25 In Appendix 8 of the BAP 'Sites of biodiversity importance in Haringey', Stroud Green Railway Bank is designated as a *Railway Lineside* habitat. The associated species list is to be completed.

2.26 Appendix 5 to the BAP identifies a Habitat Action Plan for Railway Linesides. The stated aim is:

"*To maintain trackside habitat as a green corridor and as important habitat in its own right for certain key species."*

2.27 This section confirms: "*The overground railway lines in Haringey are important areas of habitat in their own right, and they also provide important green corridors for wildlife. They are: The East Coast Mainline from Finsbury Park to Alexandra Palace and beyond.*"

2.28 In the BAP, the Council asserts: "*We will seek to protect the habitat value of the freight sidings on the East Coast Mainline at Hornsey……...We will seek to ensure that the UDP gives appropriate recognition to the habitat value of railway lands*."

2.29 Appendix 7 to the BAP is a Species Action Plan and includes a lengthy and detailed Bat Action Plan, which aims to: "*reverse the current population declines in Haringey's bats.*"

2.30 The Council recognises here that: "*Haringey has many habitats important for bats, including: railway line-sides and tunnels*" and that "*Bats are an excellent indicator of the quality of our environment, as their complex ecological requirements leave them highly sensitive to environmental changes*."

2.31 Specific factors identified as affecting the species include: "*Loss of feeding habitats due to land use change and destructive developments*" and "*Disturbance to commuting routes through loss of green corridors or introduction of new features on flight lines."*

Better Haringey

2.32 *Better Haringey* is a new £5 million programme, launched this summer (2004) to clean up the borough. The aim is to improve the quality of life for people in Haringey. A £60,000 advertising campaign was carried on the radio. As reported in the local press, *"The green theme of the ads is heightened by the sound of tweeting birds"*

Source: the Crouch End and Hornsey Journal, 8/7/04

Local Agenda 21

2.33 The Haringey Local Agenda 21 (LA21) Action Plan gives details of the steps that the Council, businesses, voluntary groups and individuals can take to ensure that the borough has a sustainable development that does not destroy the earth's natural resources. It reflects Government policy aims on sustainability.

Best Value Performance Plan 2004 – 2005

2.34 Within this Council document, the Planning, Environmental Policy & Performance Business Plan Summary 2004 – 2007 includes the following key objectives:

- *To improve customer care, consultation and community engagement*
- *To enhance the quality of the environment and improve sustainability*

2.35 One of the key things Planning, Environmental Policy & Performance is to deliver in 2004 – 2005 is:

> *"Ensuring planning policy and area strategies provide for the protection and enhancement of green spaces and the creation of leisure opportunities."*

Review of Cresswell Associates 'Ecological Appraisal of Ferme Park, Hornsey'

2.36 The Cresswell Associates report was produced on behalf of London Concrete to assess the potential environmental impact of the proposed development on the Cranford Way estate.

2.37 The study of the site was based on:

- desk research covering existing ecological information relating to the site and its surroundings up to 1km from the site boundary;
- a walkover site survey, which included a reptile survey.

2.38 It is worth noting at this stage that additional reports were commissioned by London Concrete to assess the potential impact of dust and noise from the development. The validity and accuracy of these reports was taken as given by Cresswell Associates. If the credibility of these other reports is subject to doubt, then this fundamentally undermines the ecological assessment.

Comments on the Desk Survey

2.39 The desk survey confirmed that although the site itself is not designated in the UDP as being of specific ecological importance, it is indeed next to the Stroud Green Railway Bank, which is designated in the UDP schedule 11 as a site of Local Borough Importance. The northern tip of the survey site forms part of an ecological corridor as defined in the UDP.

2.40 The desk survey further revealed that there are seven sites of nature conservation importance within 1km of the survey area. All of these sites are protected by the planning policies in the UDP and the BAP contains action plans for many of these habitats.

2.41 The Cresswell Associates report states that four species groups mentioned in the London BAP have been identified within 2km of the survey area, including bats. However, as it is clearly stated in BAP Appendix 8: Sites of biodiversity in Haringey, an up to date associated species listing for this area is *"to be completed"* Residents have recently sighted bats much closer to the proposed development site and have requested more detailed surveys by the appropriate professional organisations. According to the London Wildlife Trust Biological Recording Project (BRP), whose ecological data search of Ferme Park, Hornsey (June 2003) forms an Annexe to the Cresswell Associates report, there are no Grey Herons in the site search area, yet one local resident has spotted one on more than one occasion.

2.42 The London Wildlife Trust clearly states that its BRP does not hold comprehensive species lists and cautions that a lack of records for a particular area may mean that the area is under-recorded.

2.43 The London Bat Group, also consulted by Cresswell Associates, also insist that the data they provided is not the result of a systematic survey and that the absence of records does not mean that bats are not present within the site (which they clearly are from residents' recent observations).

2.44 Haringey's nature conservation officer has undertaken to complete a more detailed account of the area and to provide more up to date reports on the presence of bats and other species of significance.

2.45 The residents group has written to the Council and English Nature regarding details of the bats which have been recorded. Information from these bodies is still awaited and will be provided before the committee meeting but preliminary discussions indicate that there are four species on the area adjoining the site; although the fourth species cannot be identified definitely it is "most probably" a Leisler's.

2.46 At para. 3.1.5 of the Cresswell Associates report, the UDP is quoted as stating that: "*Most of the Ecological Corridors are operational railway routes. When transport development is being considered within an ecological corridor, the operational requirements of transport will be taken into account*" (OP 1.5). Not only could this paragraph not be located in the current draft UDP, it should be recognised that this application is not '*transport development'* but '*industrial development'*.

Comments on Field Survey

2.47 The Cresswell Associates survey identified a variety of vegetation, associated with grass and scrubland, including Rosebay Willowherb, denoted in the BAP as a 'flagship species.' An area of Japanese Knotweed was also identified as an injurious weed, for which great care would have to be taken to prevent this from fragmenting and spreading.

2.48 Although no reptiles were detected during the special reptile 'tinning survey', the report concedes that this may not rule out the possibility of a small population on site.

2.49 Crucially, the report recognises the importance of the site for birds, for whom it provides a valuable nesting and foraging habitat. It recommends further surveys to fully assess the value of these habitats for use by breeding birds and that these should focus on the use of the site by local BAP species.

2.50 The lack of attention paid in this report to the possible existence of bats is of great concern. Local sightings by residents living adjacent to the proposed development site suggest that there are roosts in the locality. These should be brought to the attention of English Nature and investigated accordingly. Surveys of the bat population in Haringey are not up to date, but as stated in its Action Plan for Bats in the BAP, the Council has committed itself to boosting the local population and arresting its decline in the borough.

2.51 Advice from the Bat Conservation Trust states that Planning Policy Guideline (PPG) 9 on Nature Conservation must be observed when considering planning matters. PPG9 (para 47) states that *"the presence of a protected species is a 'material consideration in considering a development proposal."*

2.52 The Trust also advises that *"Care should be taken to safeguard bats' foraging habitats too, and if they form part of the essential land-take of a development, mitigation measures should be put in place."*

2.53 Correspondence between a local resident and a representative of English Nature further emphasises the requirement for adequate surveys of the site before any work is carried out.

Assessment of Impacts

2.54 The Cresswell Associates report does not consider that the concrete factory will have any discernable effect on the adjacent habitat. However, the basis for this assessment of the

potential impact relies on the credibility of the noise and dust reports claims that there will be no discernable increases in the levels of airborne dust and background noise on and around the site. The findings of these reports are strongly contested in other sections of this document.

2.55 According to English Nature, *"Dust can harm invertebrates indirectly by eliminating their habitat or food plants or making them effectively unavailable and directly through their being toxic or causing mechanical damage"* ("Species Conservation Handbook"). Any impact on invertebrates and small insects would be passed on along the food chain to birds, bats and other species.

2.56 The Cresswell Associates implicitly trusts the findings of the concrete plant's dust suppression technology and so claims that the dust will be kept to an absolute minimum. Yet residents close to London Concrete's modern and recently built batching plant in Battersea (see Chapter 7) report that increased dust levels have been among the most noticeable impacts since that plant opened in 1999.

2.57 The Cresswell Associates report also accepts that noise generated by the operation of the factory and the large number of HGV movements to and from the site has the potential to disturb breeding birds, yet falls back on the claims of the noise report to then say that birds will get used to the noisy environment and will not be affected.

2.58 The inevitable decrease in natural habitat within the survey area is predicted by the report to lead to only a small decrease in the amount of suitable habitat for birds, invertebrates and reptiles. The fact that "*a narrow strip of vegetation will be retained on the boundary of the site"* (along the western boundary fence) is deemed to be sufficient to retain the integrity of the ecological corridor. This is despite the fact that it is the eastern side of the site, alongside the railway, that the report highlighted as being of particular value for nesting and foraging birds (Birds 3.2.12)

2.59 Furthermore, while the Cresswell Associates report may at first glance appear to dismiss the impact of the development on the ecological corridor, the statement from which the above quotation is taken does in fact admit that the integrity of the corridor will be diminished. In full, the statement reads: *"Since a narrow strip of vegetation will be retained on the boundary of the site, the integrity of the ecological corridor will* ***to some extent*** *be maintained"* (our emphasis). This begs the question: "To what extent?" and it clearly falls short of the policy requirement laid down in the UDP and highlighted in section 1 of this chapter that:

> *"Councils will not permit development on or adjacent to Sites of Special Scientific Interest (SSI's)……or other sites of nature conservation value or ecological importance unless there will be* ***no*** *adverse effect on the value of the site for nature conservation caused by the development and its subsequent land use."*

Mitigation Measures

2.60 The authors of the Cresswell Report accept that in order to uphold their convictions that the development of an industrial processing plant will have a negligible impact on the ecology of the area, a number of special measures should be implemented. These measures include:

- Retaining as much vegetation as possible;
- Augmenting the link with the Stroud Green Railway Bank;
- Maximising biodiversity by creating artificial habitats;
- Landscaping, using native species;
- Undertaking site clearance outside the bird breeding season;
- Adopting special precautions when clearing Japanese Knotweed;
- Supervision during clearance at southern end of the site by an experienced ecologist to avoid killing any reptiles that may be present.

2.61 The number of mitigating considerations requested in this case suggests that the impact of the proposed concrete batching plant on the ecology of this area could be considerable. In the event that these measures are not carried out, the impact becomes undeniable. It is of some concern as to how the implementation of these measures would be monitored and their effectiveness evaluated.

The Ecological Case for Refusing the Development

2.62 This section summarises the key reasons why the effects of the proposed development on nature conservation interests justify refusal of the current application.

a) The proposed site for development is adjacent to land designated in Haringey's UDP (appendix 11) as a Site of Local Borough Importance, referred to as the Stroud Green Railway Bank. Policy OS5 under the umbrella policy on Open Spaces states that development on or adjacent to such sites must have no adverse effect on the value of the site for nature conservation. The Cresswell Report, commissioned by the applicant, effectively admits that this condition cannot be met.

b) Dust from the operation and dirty run-off water produced when vehicles and facilities are washed out will contaminate the area and threaten the existence of plant-life and small invertebrates forming a vital part of the food chain for birds, bats and other species. English Nature is unequivocal about the dangers to animal life from such dust.

c) Activity at the trackside and sidings, such as the unloading of aggregates and clearance of much vegetation on and around the site, will endanger any ecological activity in this green corridor and discourage further use by existing species.

d) In terms of assessing the full extent of the impact on animal life, the lack of an up-to-date species list or bat roost survey for this area makes this impossible. Further detailed studies are required before a decision on this proposal can be safely made.

e) The Cresswell ecological appraisal report calls for further surveys to be carried out to assess the value of the area for birds. Until and unless such surveys are taken, it would be improper to grant approval for this development and would leave any decision made now open to legal challenge.

f) The Cresswell report also lists no fewer than SEVEN actions that need to be taken in order to mitigate the impact on the environment. This clearly suggests that the impact would be potentially very high. It begs the question: “Who is going to police the implementation of the mitigating actions and how?” Unless clear and demonstrably effective mechanisms can be put in place to ensure this, the risk of creating adverse impacts should not be taken.

g) The siting of a heavy industrial processing plant in the heart of a family-orientated, residential area is totally inappropriate and out of keeping in a part of the borough defined in Haringey’s UDP as: “*a predominantly residential area with the borough’s heaviest concentration of conservation areas. The priorities in this area are ones of environmental management, improving the quality of life and its environmental assets such as its attractive open spaces.”*

h) Allowing the development will not contribute to achieving the stated aims of Haringey’s Biodiversity Action Plan, which is “to conserve, enrich and celebrate the wildlife in Haringey.” (Haringey Biodiversity Action Plan BAP);

i) Allowing the application to proceed would contradict the Council’s open space (OS) policy (Chapter 8 of UDP) and the stated need to protect and enhance ecological corridors and green chains (OS15);

j) Approving the application would be contrary to the aims of Haringey’s Biodiversity Action Plan to maintain and protect trackside habitat and to protect the habitat value of the freight sidings on the East Coast Mainline at Hornsey (Appendix 5 BAP);

k) The operation of a concrete factory in this area will not help the Council to achieve the aims of its Bat Action Plan contained in Appendix 7 of the BAP, which includes reversing the declining bat population in the borough.

3.0 TRANSPORT AND TRAFFIC ISSUES

3.1 This chapter focuses on the traffic implications of the proposal. It comments on the main policy documents cited by London Concrete / Firstplan. Assessment is also made, not only of the volume of traffic that would be generated were the plant to be approved and its effect on local roads, but also the environmental impact of the types of vehicles used the pattern of ready-mixed concrete movements in this part of north London, and the negative effect on various aspects of the Government's and Haringey Council's plans for improving the living environment.

3.2 The conclusions reached result from a close study of the policy documents, reports submitted by London Concrete's consultants, plus concrete industry and other relevant sources.

3.3 In the objectors' view, the transport implications of London Concrete's proposals are wide-ranging while the information relating to vehicle movements and their impact on the area, as contained in Firstplan's report and the Transport Assessment submitted by Bellamy Roberts, is both flawed and misleading. It is likely that much of the data gathered to support this view will be new to Council members.

The Market for Ready-mixed Concrete in Haringey

3.4 The Firstplan report makes a number of assertions regarding the demand for ready-mixed concrete in the Haringey area, the maximum distance over which ready-mixed concrete can be transported and the plants already serving the area, all of which it believes support the need for a concrete batching plant in Cranford Way. In each case these do not bear scrutiny.

The Demand for Ready-mixed Concrete

3.5 Paragraph 9.1 of Firstplan's report states: '*There is a strong demand for ready mixed concrete in the Hornsey / Haringey market …*'. No evidence is offered to support this statement.

Distance over which ready-mixed concrete can be transported

3.6 Paragraph 9.2 of Firstplan's report states: *'… given that ready mixed concrete cannot be transported more than 5 miles …'*.

3.7 This statement is not supported by evidence this document has sourced from other organisations in the concrete industry. For example, RMC Readymix Ltd, a large UK operator with 15 ready-mix plants in London alone, states in its Sustainable Development Report (2001) that '… *ready-mix concrete is typically taken 5 – 10 miles from plant to clients sites*'. Discussions with staff at three ready-mix plants within 3.5 miles of Hornsey (RMC Readymix Ltd, Tarmac, which has seven other plants in London, and Hanson, which also has at least seven plants in London), indicated that a two hour journey time was regarded as the absolute maximum desirable for the standard product. Furthermore, additives used in a number of categories of ready-mix concrete could prolong that time.

Distance travelled from other plants serving the Haringey market

3.8 Paragraph 9.4 of Firstplan's report states: *'Currently the plants serving the Haringey market and lorries transporting concrete to the area travel a substantial distance to reach customers'.*

3.9 In the preceding section of their submission (paragraph 9.3) Firstplan lists six competitor's plants to which the above remark is applied. Three of these are in Edmonton, some 3.5 miles north-east of Hornsey, the other three are at King's Cross, to the south and less than 3 miles away. Even allowing for traffic congestion, all six plants can, and do, supply Hornsey and Haringey's ready-mix requirements within the critical two hours referred to in paragraph 2.1 above. Firstplan's claim that these plants are not capable of serving the market in the area is therefore spurious.

3.10 According to the major competitors referred to in paragraph 2.2 above, there are several other suppliers of ready-mixed concrete who can also easily supply Haringey.

3.11 London Concrete itself could supply Haringey from their Wembley plant, situated just off the A406 by Neasden Station, within a time frame of 30 – 50 minutes. Even when the flow of London traffic is very slow, a 5 - 10 mile journey does not take more than 60 – 90 minutes.

3.12 All this suggests that there is no requirement for a new concrete plant in this location to serve the Haringey market. There is therefore no overriding need for this development in this location that should outweigh its adverse impacts.

A reduction in HGV movements?

3.13 Also in paragraph 9.4, Firstplan claim that by setting up a plant at Cranford Way '… *HGV movements in Haringey will be reduced'*.

3.14 Currently, the only HGV movements associated with ready mix concrete would be by those vehicles delivering to customers in Haringey and Hornsey. At present, this does not happen in any one location in Haringey on an everyday basis. However, were the Cranford Way plant to be built there would be significant daily movement of HGVs, concentrated at the node in Hornsey, and spreading out through Haringey and neighbouring areas. This would mean at least 58 HGV movements based on Firstplan's estimates for London Concrete's own 5 vehicles. Furthermore, that figure will very likely be exceeded as London Concrete expects to sell ready-mix to customers who collect.

3.15 Currently there are hardly any daily movements of HGVs carrying ready-mix concrete in the Hornsey area.

3.16 Additionally, Firstplan also claim that by having their ready-mix concrete facility in Cranford Way, there will be less movement of aggregates through Haringey. As their competitors in Edmonton receive aggregate from the north and as two of those at Kings Cross receive their supply by rail and the third by river and a short road transfer, there is no substance to this claim.

Analysis of Bellamy Roberts transport assessment report - Volume of traffic movements

Number of vehicle movements from the application site

3.17 The transport assessment report commissioned from Bellamy Roberts estimates some 25 loads of mixed concrete for distribution, by London Concrete's own HGVs, into this area of London giving rise to an average of 56 vehicle movements per day to and from the application site'. This figure is inclusive of 4 – 6 cement tanker movements per day (2 or 3 deliveries a day).

3.18 As stated above, cement will be brought into the plant by road tankers. Ready-mixed concrete generally requires an aggregates / cement ratio of 5:1. Using London Concrete's figure of 1350 tonnes of aggregates arriving by rail 'two or three times a week', i.e. a maximum of 4050 tonnes, a total of 810 tonnes of cement would be required. More than 6 road tankers a day would be required to bring in that quantity of cement!

Impact of traffic movements on Cranford Way area and Tottenham Lane

3.19 In support of their application, London Concrete employed Bellamy Roberts to carry out an independent assessment of the impact of their vehicles within the Cranford Way area and the immediate access route, Tottenham Lane. The conclusion of this assessment was that *'… the traffic generated by the development will have no material impact on either highway capacity in Cranford Way or Tottenham Lane.*' However, in the objectors' view, these survey results are flawed and the conclusions drawn are therefore erroneous.

3.20 On one day (Thursday 13th March 2003) between 0700 and 1900 hours, Bellamy Roberts surveyed the flows of traffic into and out of the one-way section of Tottenham Lane generated by Cranford Way. A count was also made of the total traffic movements along that one-way section of Tottenham Lane. Table 7.1 below sets out, in summary, results of the survey made by Bellamy Roberts over this 12 hour period:

	Movements into Tottenham Lane	**Movements out of Tottenham Lane**
Cars/Lgvs	415	317
2 Axle	114	84
3 Axle and above	40	26
Totals	569	427

Table 4: Survey of Traffic Movements on Tottenham Lane

3.21 Two types of HGVs will use the plant. The 5 ready-mix vehicles to be used by London Concrete will each have a capacity of 8 m^3 of concrete (20 tons), will have 4 axles and an all up weight of 32 tons.

3.22 The bulk cement tankers can be expected to have an all up weight of 44 tons. These tankers typically comprise a powerful 3 axle Tractor unit coupled with a 3 axle articulated trailer.

3.23 These HGVs are expected to make 28 movements into and 28 movements out of Cranford Way as a minimum, giving a base figure of 56 movements a day.

3.24 In their assessment, Bellamy Roberts claim that these movements will result in a 7.6% increase in overall traffic movements into and out of Cranford Way. However, that low figure is only achieved by comparing these heavy vehicles (3 and 4 axles) with very much lighter

vehicles, such as cars and light goods vehicles (small vans) and 2 axle vehicles using Cranford Way.

3.25 Comparing London Concrete's 56 movements along Cranford Way with the 40 + 26 movements of similar vehicles recorded by Bellamy Roberts (see Table A above) shows that there would be an increase of 84.8% in the total movements of HGVs of 3 axles and above.

Impact of traffic movements on southern part of Cranford Way

3.26 Bellamy Roberts were careful to make separate measurements of the traffic flows in the southern part of Cranford Way, the longest section of that road and the area closest to the proposed plant, to Chettle Court, Wightman Road and Uplands Road. Here the total movement was 700 vehicles, of which 111 were 2 axle and only 36 with 3 axles or more. The balance of 553 were cars /LGVs. On a like for like basis, London Concrete's 56 HGV movements amount to **a 155.5% increase of 3 axles and above vehicles**, or **38%** if the 2 axle vehicles are also taken into account.

Impact of traffic movements along Tottenham Lane

3.27 With regard to the impact on traffic along Tottenham Lane, the BR transport assessment gives an increase of 0.6% in traffic flows and 5.6% in HGV movements (including buses). Bellamy Roberts go on to point out (paragraph 6.3) that this is '*well below the normal threshold of 10% at which consideration of whether or not further investigation is justified*'.

3.28 In their 12 hour survey Bellamy Roberts' surveyors enumerated a total of 6,225 vehicle movements along the one-way section of Tottenham Lane, of which (Appendix 3 final page) 168 were MGVs and 163 HGVs. There were also 170 buses/coaches.

3.29 Comparing like with like, the base figure of 28 London Concrete HGV movements would represent an increase in large and heavy vehicle movements, along Tottenham Lane, of 17.2%, not 5.6% as Bellamy Roberts calculated (para 6.2. page 13).

Possible Impact of Contractors Collecting Own Supplies from Cranford Way

3.30 Bellamy Roberts's transport assessment also fails to take account the effect of Building Contractors collecting their own supplies, a significant feature of their business.

3.31 During a 30 – 40 minute observation outside London Concrete's Wembley plant at Great Central Way (close to its junction with the A406), it was noted that three 2 axle vehicles collected ready-mix concrete, while only one of London Concrete's own 4 axle vehicles came during that period. If a conservative estimate is made that 25 Building Contractors would collect their own supply of ready-mix in 7 – 12 tonne loads (3 – 5 M3), in their own MGVs or HGVs, each day, then the traffic movements in Cranford way will show a further increase.

3.32 The impact of London Concrete-generated increase in traffic, taking into account the contractors collecting with their own vehicles, will now be an increase of **16% in MGV/ HGV activity alone**, along Tottenham Lane - a figure in excess of the 10% threshold required to trigger consideration of whether or not further investigation is required.

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

Impact of mixer trucks on road surface of Cranford Way

3.33 As mentioned above in (paragraph 7.25), along the southern part of Cranford Way 3-axle HGV traffic would increase by 155.5% and 2 axle and above 38% respectively. Damage, wear and tear to roads is proportional to axle weight. Eight cubic metre concrete mixer trucks carry 20 tonnes of concrete. Their rear axle weights are therefore close to the maximum permissible on UK roads. Their contribution to road damage is therefore disproportionate to their number. No assessment has been made as to whether Cranford Way has been designed to sustain such high and frequent loading. The local highway authority should consider whether Tottenham Lane, Church Lane, Wightman Road and Turnpike Lane been designed with that level of load in mind and what the impacts of such levels would be on these roads.

Noise Pollution from Railway Rolling Stock

3.34 In Firstplan's report much has been made of the use of rail for freight delivery and how that sits within the national and regional planning policy frameworks. However the report from Bellamy Roberts fails to note that rail use will only be of real benefit if we have modern rolling stock on well maintained track. Residents of Chettle Court, Uplands Road, Rathcoole Gardens and Wightman Road know from experience how noisy the railway can be at night. The increase of screeching and banging emanating from the railway on a nightly basis, as a result of aggregate being delivered and loaded into hoppers, does not bode well for a future of increased rail use for freight through residential areas.

3.35 One of the Mayor of London's transport priorities is:

> *'making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts'*
>
> *Source: The Mayor's Transport Strategy, Executive Summary, paragraph 13, page 5*

3.36 Whilst carrying more freight by rail is a laudable aim, this should not be at the expense of excessive noise and vibration affecting residential amenity. The real benefit of carrying freight by rail has been heavily overstated in Firstplan's report and should not override environmental impacts on residential areas.

Impact on non-car means of transport and public transport

Buses

3.37 As the Sustainable Haringey Action Plan makes clear, buses are the most important form of public transport in Hornsey and Crouch End. The Mayor of London's Transport Strategy:

> *' … aims to make buses the first choice for a greater number of journeys … In outer London, buses will continue to be the primary means of public transport and will be improved to offer a real alternative to the car.*
>
> *Source: The Mayor's Transport Strategy, Executive Summary, paragraph 29*

3.38 This is doubly the case in Crouch End and Hornsey, which do not have Underground stations within easy reach.

3.39 However, the forecast increase in HGV traffic as a result of the concrete plant proposals will hamper the efficiency of bus services. Bus services 41, 91, W3, W5 and W7 all have well-

established routes in the area which would also be used by London Concretes mixer lorries, other contractors' vehicles collecting ready-mix from Cranford Way and the cement tanker-trucks. Were this HGV traffic to use residential roads in an attempt to avoid more congested routes, it could cause real difficulties for W3 and W5 services.

Walking and Cycling

3.40 Walking and cycling are the two other forms of non-car transport that local authorities are keen to promote. As the UDP states:

> *'The Council will encourage walking and cycling in and around the borough and will improve existing and create new walking and cycling routes and cycle parking facilities across the Borough'.*

3.41 The increase in HGV traffic will have implications for both methods. For walkers, it will mean an increased amount of air pollution. With regard to younger pupils from the eight schools in the area, parents will be concerned about safety, quite apart from the impact of air pollution on the health of their children, especially those who suffer from asthma. Under such circumstances parents will be less likely to allow their children to walk or cycle to school, and will opt for 'the school run', which in turn will further add to congestion and air pollution.

3.42 While the Haringey UDP is positive about cycling, it admits in paragraph 7.11, that it is: 'characterised by relatively high accident rates and the actual and perceived danger acts as a major deterrent to people taking up cycling.'

3.43 There is evidence that HGVs in particular have been involved in a disproportionate number of cycling fatalities. Several concrete-mixer vehicles have been involved.

> '*Lorries account for seven per cent of all road traffic but are involved in 26 per cent of cyclists' fatalities.'*
>
> *Source: East London Cyclist Archive. September 2000*

Transport Policy Issues

Planning Policy Guidance Note 13 (Transport)

3.44 PPG 13, in particular the paragraphs relating to freight, is central to London Concrete's application. As Firstplan admits in its report accompanying the proposal, the whole basis of the application is the supply of materials to the plant by sustainable means, and '*in London this means rail transportation'*. Taken by itself, few would object to the principle outlined in paragraph 47, that '*local authorities should seek to enable the carrying of material by rail or water wherever possible*…'.

3.45 However, Firstplan's report is narrow and selective in what it chooses to support its case. In section after section, it merely cites those paragraphs from policy documents which support what is London Concrete's sole claim to sustainability - the transportation of aggregates by rail. As with other aspects of the application, it entirely fails to take account of the wider planning context, in this case the effects of transporting the product away from the plant. The following sections can be cited from the same section of PPG13 on freight:

> *'…. In determining planning applications, local authorities should … where possible locate developments generating* ***substantial freight movements*** *such as distribution*

and warehousing, particularly of bulk goods, away from congested central and residential areas, and ensure adequate access to trunk roads.'

' …. Policies need to strike a balance between the interests of local residents and the wider community, including the need to protect the vitality of urban economies, local employment opportunities and the overall quality of life in towns and cities.'

3.46 In addition, it needs to be emphasised here that there is an anticipated 2-3 years of cement tankers delivering to the site 2-3 times daily (4-6 movements), until such time as rail access is available.

Haringey Unitary Development Plan

3.47 The Haringey UDP generally accords with PPG13 on transport issues. Its section on movement (Chapter 7 of the First Deposit Consultation Plan, September 2003) emphasises sustainable modes of travel such as walking, cycling and public transport and discourages car use (see Introduction, para.7.1).

3.48 However, the UDP is explicit in noting that while freight movement must be improved, the environmental impact must be minimised (see paragraph 7.1). Section 7.21 is directly relevant to this application:

'The Council will seek to retain existing rail freight and water facilities, that are still needed for operational purposes, and the provision of additional facilities, provided these do not give rise to undue local environmental disturbance'.

3.49 The objectors would contend that London Concrete's planning application should be refused on precisely this issue, that any advantages accruing from the transport of aggregates by rail are far outweighed by the negative impact on the wider environment, residential and ecological, as indicated in this and other chapters of this document.

Sustainable Haringey: Local Agenda 21 Action Plan

3.50 Further policy direction is given in the Sustainable Haringey action plan, which sets out the community's, and Haringey Council's, aspirations for the future, under three themes - living, working, and movement.

3.51 The objectors consider that, were London Concrete's proposal to be accepted, the additional HGV traffic generated would have a detrimental effect on the small urban township character of Crouch End and Hornsey, jeopardising seriously some of the key objectives and initiatives which Haringey Council has signed up to in the Sustainable Haringey Action Plan, including:

- Make walking and cycling safe and attractive;
- Improve the quality of frequency of public transport services;
- Creating additional bus lanes;
- A thriving local economy with a better range and quality of local shops that are attractive, accessible and healthy.
- Implementing policies to improve air quality.

3.52 In summary, London Concrete's activities will lead to a very significant rise in HGV movements along the southern limb of Cranford Way and a significant rise of such vehicles along the one-way system in Tottenham Lane, which is already congested at peak times. This will adversely affect bus services, as well as deter trips by walkers and cyclists, and encourage parents to

drive children to school. These factors are not outweighed by the proposed sustainable use of rail to transport aggregates.

3.53 The additional HGV traffic generated on already congested roads, and the further deterioration of air quality, will contribute to a downgrading of the area and do nothing to alleviate the impression of decay and high levels of litter cited by the Action Plan in connection with retail centres. Both Crouch End and Hornsey could see reduced levels of service industry investment and even a reversal to the currently thriving local economy as it becomes perceived as a less attractive environment in which to live. Quite simply, Crouch End and Hornsey will become a less desirable area for both business and residents.

4.0 NOISE ISSUES

4.1 This section deals with potential noise impacts of the proposed development.

4.2 The Sharps Redmore Partnership (SRP) carried out an “Environmental Noise Assessment” in support of London Concrete’s application to construct and operate a concrete batching plant at Cranford Way, Hornsey.

4.3 The SRP report reviews some of the planning guidance with respect to noise limits for new developments, and some of the standards detailing threshold noise levels with respect to health and standards for noise survey procedures. The SRP report then describes a noise survey carried out in the vicinity of the proposal site, calculates likely levels of noise generation based on London Concrete’s activities in Wembley and then draws conclusions, based on the work described above, about the likely environmental impact of London Concrete’s new concrete batching facility.

4.4 This chapter provides a response to the findings of the SRP report. In so far as it is possible, the same format as that adopted by SRP is followed so that comparisons may be made on a section by section basis. Comment is then made on the planning guidance and British Standards reviewed in the SRP report and some other documents offered for consideration. Lastly, the noise survey methodology adopted by SRP is reviewed along with the base information used to calculate the predicted noise levels generated by the site activities.

4.5 On the basis of the work done (or not done) by SRP, this chapter draws its own conclusions on the likely impact of proposed concrete plant site activity on Chettle Court and where further work will be required to rigorously assess the environmental impact of London Concrete’s proposals.

Comments on the SRP Assessment Methodology and Criteria

4.6 SRP chose to adopt an impact assessment methodology that is not in accordance with a true Environmental Impact Assessment. Rather than compare before and after noise levels, the report takes the upper limits quoted in BS 8233 for various locations and then attempts to demonstrate that the noise produced by the plant is below these limits.

4.7 It should be noted however that the limits that the report adopts are those below which serious or moderate annoyance are unlikely and below which psychological, physiological, or sociological effects are unlikely. Given that the noise levels are at the upper end of these limits, they will cause annoyance.

4.8 The SRP report briefly refers to the guidance given in Planning Policy Guidance (PPG) 24: *"Planning & Noise*". SRP refer to "Noise exposure levels" (NECs) and paragraphs 19 & 20 of Annex 3 of PPG24 to justify their adoption of the BS 8233 Limits.

4.9 However, paragraph 4 of Annex I in PPG 24 clearly states that "*the NEC procedure is only applicable where consideration is being given to introducing residential development into an area with an existing noise source, rather then the reverse situation where new noise sources are to be introduced into an existing residential area".*

4.10 Furthermore, paragraph 2 of PPG 24 states "*It will be hard to reconcile some land uses, such as housing, hospitals or schools with other activities which generate high levels of noise, but the planning system should ensure that, wherever practicable noise sensitive developments are separated from major sources of noise*". Paragraph 2 goes on to say that where separation is not possible, planning authorities should consider measures "*to control or reduce noise levels, or to mitigate the impact of noise, through the use of conditions*…"

4.11 Paragraph 5 of PPG 24 states that planning policy should ensure *that "potentially noisy developments are located in areas where noise will not be an important consideration….*" and that planning authorities may adopt policies "*to avoid noisy developments in areas which have remained relatively undisturbed by noise nuisance…*"

4.12 For the avoidance of doubt, PPG24 paragraph 6 states that "*The Secretary of State considers that housing, hospitals and schools should be regarded as noise-sensitive development".*

4.13 PPG 24 further clarifies what rights residents might reasonably expect with regard to noise impacts. Paragraph 17 states that "*most residents will also expect a reasonable degree of peaceful enjoyment of their gardens and adjacent amenity areas*" and that "*Authorities should take into account the fact that … the introduction of noisy activities into such [suburban] areas may be especially disruptive*."

4.14 PPG 24 also makes clear that it is not unreasonable for residents to expect that their windows are open to provide adequate ventilation.

4.15 Thus PPG 24 does not justify adapting the BS 8233 limits and it is important to note that BS 8233 cautions its users with "*there is no prescribed limit above which noise becomes a statutory nuisance. The noise complained of need not be injurious to health; the criterion can be one of interfering with ordinary comfort or amenity*".

4.16 The SRP report also ignores the Mayor of London's Ambient Noise Strategy (MANS). This document recognises that noise levels in London are increasing and that we should all act to prevent this worsening situation. It also defines the concept of "*creeping ambient - a gradual upward creep in background noise levels*".

4.17 The "*creeping ambient*" effect comes about when new developments set their allowable noise levels at about the existing ambient level (as London Concrete suggest). The addition of the existing and new noise sources combine to produce a new higher background noise level. The next development sets its noise levels at about the new background level, the new background and new development noise combines to produce a new even higher background level. With successive development this approach leads to a steadily increasing noise environment.

4.18 MANS suggests that all new sources of noise, from new developments, should be limited to 10dB less than current background noise levels so that they do not contribute significantly to any noise increase and of course allow Londoners to take advantage of quieter vehicles and other technological advances in pursuit of a quieter, better quality of life.

4.19 Limits of between 5-10dB have been adopted by other London Boroughs and certainly by the Cities of London and Westminster. Whilst not yet formally adopting these limits Haringey has stated in the UDP that "*the Council will require development proposals to demonstrate that there is no significant adverse impact on residential amenity… in terms of … noise, fume and smell nuisance*".

4.20 To summarise planning guidance, despite what is said in the SRP report, it is not sufficient, when developing close to existing residential properties, to quote limits that are just below those considered "*not detrimental to health*" and then set the break-out noise levels from the new development to just below these levels. The planning authorities should seek to separate noisy development from sensitive resident development and, if this is not possible, impose conditions to maintain residents' current enjoyment of their houses, gardens and local amenity areas.

4.21 It is then incumbent on the developer to properly establish existing "baseline" conditions and to design reasonable mitigation measures to limit the noise break-out from the site to a level sufficiently below true ambient conditions to be of minimal detriment to the noise climate of the affected residences.

Comments on SRP Survey Results

4.22 SRP describe their survey thus: "*it was not possible to gain access to the [Chettle Court] grounds facing the site. Thus, instead, measurements were taken at the entrance gate to Chettle Court and at the entrance to the application site. The background noise levels in these locations were found to be the same so the longer term survey was undertaken entirely at the entrance to the application site*".

4.23 As an attempt to establish the baseline (noise level) conditions at sensitive locations around the application site, this is woefully inadequate.

4.24 The noise survey results and report imply that the area as a whole is noisy and that a little bit more will not matter. However, this is not the experience of the residents of Chettle Court or Uplands Road. By only briefly measuring noise levels at the entrance gates, the determination of noise levels over the application site and adjoining area would have been highly misleading.

4.25 Not only would a position at the gate be the noisiest at Chettle Court as all the traffic to and from the building has to funnel through this point but, by measuring only at a point in the morning, the true distribution of noise throughout the day has not been determined. The morning is the busiest (noisiest) time at Chettle Court as service vehicles come and go and people head off to work. Normally after this morning rush the area returns once more to the peaceful residential area that it is despite the SRP report. SRP have missed all this because they were only in the area briefly in the morning and spent most of the time "*at the entrance to the application site*".

4.26 SRP should have measured current noise levels actually outside the Chettle Court flats (receptor points) closest to the development. Furthermore, they should have included in the survey other properties on Uplands Road and perhaps, more significantly, on Wightman Road on which there are properties close to and clearly visible from the application site.

4.27 The effect of other activities such as the unloading of trains and the noise of conveyors, which would be particularly relevant to the unconsidered properties on Wightman Road, should also have been considered.

4.28 To summarise, the taking of some readings at the Chettle Court gates - the noisiest location and at the noisiest time - and then retiring to the entrance to the application site cannot be considered representative. Furthermore surveying only in the mornings is not sufficient to properly establish the true distribution of noise throughout the day. Any conclusions drawn on

the basis of this survey as to the current background noise levels at the actual receptor points must be extremely doubtful and do not provide an adequate basis to determine this application.

Estimate of Site Noise Emission Impacts

4.29 Whilst disputing the findings of the SRP survey, even using their figures and their calculation methodologies, it is still possible to predict some significant increases of noise from the proposed development. This section has therefore been written generally without reference to the survey problems highlighted in the previous section.

4.30 The noise levels generated by the site activities quoted have not been independently verified and there is no discussion, in the SRP report, of the differences between the site and plant at Wembley and the site and plant proposed for Cranford Way. The case therefore has not been made that the use of Wembley data is applicable to this site.

4.31 The maximum calculated noise level at Chettle Court for lorry filling operations is 84.5dB. This is in excess of 12dB higher than the maximum noise levels measured in the area and some 30 dB above the quoted background levels which, because of the methodological errors discussed above, may already be too high. Hidden in an appendix is the information that an increase of 10dB will be perceived as a doubling of loudness. Thus, at best, these activities will double the perception of “peak noise” levels and could be even worse.

4.32 The SRP report considers the noise of these activities averaged over 12 hours. Note however that this is both a time and event averaged figure and if lorry filling events were to double (in the equation on page 9 of the SRP report) the average noise from site activity is further increased. Similarly, if activities were to be concentrated in the mornings the average noise from the site is again increased.

4.33 It is also unclear from the report whether, when calculating noise levels at Chettle Court, if the report considers receptor points higher than 1.5m above ground level when, of course, many of the flats are above that level.

4.34 The predicted time averaged level of noise from the stated level of site activity at Chettle Court is 52dB +/- 3dB. At best, according to the report’s figures this is the same as current background noise levels; at worst, maybe as much as 3dB more.

4.35 If the number of filling activities were to double, which is quite possible given the plant and equipment proposed for the site, the predicted time averaged noise level would rise to 55dB still +/- 3dB. Thus time averaged noise levels from site activity are now up to 6dB above the stated existing ambient levels.

4.36 The report does not evaluate the sum of the existing ambient noise and the predicted site noise levels. In Appendix B, the SRP report notes that the addition of two 50dB noise sources results in an overall increase of 3dB but the SRP report does not evaluate the sum of new and existing activity.

4.37 The dB scale is logarithmic so adding noise levels is not a simple arithmetic procedure. Table 5 below has therefore been prepared illustrating the effect of combining existing background noise with various levels of noise from site activities.

4.38 Two levels of existing background noise have been used - the 52dB quoted in the report and 49dB, a lower figure, to take account of the methodological errors in the report and the accuracy of the equipment.

4.39 With respect to the site activities, a range of levels has been assumed, reflecting the quoted accuracy range of +/- 3dB and the effect of increased activity on the site.

Table 5: Estimated Noise Impacts (dB)

Background Noise	**Site Noise**	**Sum**		**Background Noise**	**Site Noise**	**Sum**
52	49	54		49	49	52
52	52	55		49	52	54
52	55	57		49	55	56
52	58	59		49	58	59

4.40 From the above, it can be seen that the addition of existing noise sources to the noise from site activity could result in an overall increase of 7-10dB. This is a very significant increase as a 3dB increase is considered a perceptible change, 5dB is significant and 10dB is perceived as a doubling of loudness.

4.41 Thus it can be seen that even using the figures based on the wholly inadequate SRP survey the effect of site activities on the noise climate of the area will be significant.

Conclusions

4.42 The assessment criteria chosen by SRP are not in accordance with current planning guidance. PPG 24 has been selectively quoted by SRP and closer examination of this guidance reveals that planners and developers are required to protect sensitive developments from new noise sources.

4.43 The Mayor's Ambient Noise Strategy and the Haringey UDP have not been taken into account.

4.44 The noise survey, particularly in respect of the methodology and the measurement locations considered, is inadequate to establish baseline conditions at sensitive locations around the site and this in itself renders the conclusions reached in the SRP report as invalid.

4.45 The case has not been made that noise data from London Concrete's Wembley site is applicable to Cranford Way. However, even using SRP's existing background noise levels and the Wembley noise data for site activities, the impact of this development on the existing surrounding sensitive developments will be significant. This is not clear in the SRP report because it glosses over the fact that filling operations are significantly noisier than anything happening in the area and no account is taken of the effect on their "time averaged" noise level of increased site activity.

4.46 Looking at the effect of increased fill events is relevant because London Concrete have a history of applying for planning permission quoting operating levels which they then try to

double after a few years of operation. Similarly, First Plan stated, at the August Forum, that activities are often concentrated in the morning.

4.47 Before determining this application, more work is necessary to truly assess the local noise climate and the true effect of this noisy development proposal. This work is likely to demonstrate that the development proposal is incompatible with existing surrounding sensitive residential development without serious measures to mitigate the effects of the noise produced by the plant's operations. If significant adverse effects are found that cannot be adequately and reliably mitigated by enforceable measures, then this will justify refusal of this proposal.

5.0 AIR QUALITY, POLLUTION AND HEALTH ISSUES

5.1 This section considers the impact of the proposed concrete batching plant on local pollution levels and the health related issues of the local community. It comments on the adequacy of the Airborne Dust assessment undertaken by Smith Grant Environmental Consultancy, on behalf of the applicant, and highlights potential impacts of concrete dust on human health, drawing on both international studies and reports on health conditions in Haringey.

5.2 To set the context, the site of the proposed development is situated in Cranford Way industrial estate with road access via Tottenham Lane. This proposed development falls within the general area of three electoral wards - Hornsey, Stroud Green and Haringey.

Comments on the Smith Grant Airborne Dust assessment

5.3 The Smith Grant Airborne Dust assessment describes the setting of the application site as:

> *4.3 "Uplands Road, on the eastern edge lies 70m slightly uphill across open scrub land to the west of the application site and 100m from the actual batching plant."*
>
> *4.4. "Chettle Court, a large block of flats, stands on the crest of a scrub land slope, 100m above and to the south of the application site."*
>
> *4.5 "Wightman Road, on the western edge of the residential area of Haringey, lies 130 m to the east across a series of railway tracks and sidings."*

5.4 No mention has been given to the children's playground, basketball court or open green space lying between Chettle Court and the proposed development site.

5.5 In terms of wind assessment, using wind data from Heathrow is acceptable in the sense that it reflects the general wind climate of London. However there are some points that have not been raised that are pertinent to this site.

5.6 As far as Chettle Court and, to a degree, Uplands Road are concerned, even though easterly and north-easterly winds are less frequent than south-westerly winds they are concentrated in the spring when the green break between the proposed concrete plant and the residential property has less cover. As wind goes over a hill or slope the wind speed is accelerated. Consideration of this does not appear in the report; indeed the report says *"Dust emissions are less likely to be carried up the slope*". If wind speeds are being accelerated, it is less likely that dust will be deposited in the space between the proposed plant and the residential properties nearby. The report does actually admit in paragraph 4.2 that:

> **"***There is little effective screening in terms of airborne dust between the application site and the closest potentially sensitive receptors."*

5.7 In London Concrete's application for a similar development at Tolworth and Hook Rise in the London Borough of Kingston, the application clearly stated that the plant may increase dust levels in the area particularly within 200m of the site. Residents in that area protested that it was not good enough for London Concrete to say in its Airborne Dust Assessment Report that most of the dust should fall out over the first 200m. Previous operations on that site have resulted in clouds of dust over the site, which have then drifted into residents' homes. The new

houses built on the MAFF site near to that plant will be particularly adversely affected, given their proximity and the fact that a conveyor lifts the aggregates 15m into the air.

5.8 Although London Concrete states that a dust extraction system will be in place in their proposed plant in Crouch End, the following factors should be taken into consideration.

5.9 Firstly, concrete plant operators do not always operate in a way that avoids environmental effects on the adjoining area, as the following report illustrates:

> "*Aggregates business fined for unauthorised LAPC process.*
>
> *One of the UK's leading aggregates businesses, Aggregate Industries, has been fined £13,000 after operating a new concrete batching plant without an authorisation. Barrow Magistrates imposed the fine in August after the company pleaded guilty to operating a concrete batching plant in Barrow without a local air pollution control authorisation in breach of the EPA.*
>
> *The Court was told that Barrow-in-Furness Borough Council had advised the company that an authorisation would be required. Following a complaint of dust nuisance, officers from the Council found that the company had built and was operating the plant without authorisation. The cause of the dust was that the plant was also being operated without any dust "suppression equipment."*
>
> *Source: http://www.clarkewillmott.com/sectors/property/introduction/bulletins*

5.10 It should be noted here that London Concrete is over 50% owned by Aggregate Industries.

5.11 In the case of Crouch End, London Concrete therefore proposes to operate a concrete plant within a predominantly residential area, with some dwellings lying within 70-130m, knowing that dust will fall out over the first 200m.

5.12 Haringey's UDP clearly states in Policy ENV5: Pollution that:

> *3.15 The Council will control potential pollution resulting from development in the borough by:*
> *a) Requiring development to locate close to facilities and public transport;*
> *b) Requiring developments to include mitigation measures to reduce the emission of pollutants;*
> *c) Separating potentially polluting activities from sensitive areas (green belt or MOL) or uses (schools, hospitals, homes);*
> *d) Requiring developments that may cause pollution to locate in areas such as the defined employment areas to minimise their impact on the environment.*

5.13 It is also stated within the Smith Grant Airborne Dust Assessment that:

> *"5.21 The presence of busy urban roads and industrial estates on Cranford Way with loose potentially dust deposits throughout suggest that the dust reposition rates in this area are likely already to be elevated. The deposition rates are likely to lie towards the upper end of the range for suburban areas and may be in the order of 80 MG/M2/DG. In suburban areas the dust reposition rates range typically between 30 and 80MG/M2/DG.'"*

5.14 The authors of the dust report have not actually measured the current dust deposition rates. On the basis of their visual assessment they have assumed that the rate is at the upper limit for suburban areas 80mg/m^2/day. On that basis, they state that the additional 20mg/m^2/day of dust from that plant would not be significant. But 25% is not insignificant and of course that figure is based on an assumption which could be quite incorrect as it is not based on a proper site survey.

5.15 The Smith Grant report also states that:

> *"5.3.1 In connection with the proposed batching plant, the pollutants of most concern are emissions of fine particles PM10 from the process and emissions of PM10 and nitrogen dioxide from the exhausts of HGV's.*
>
> *The mapped data gathered from the Local Air Quality management web site have used readings from 2001therefore not providing current PM10 particle reading.*
>
> *5.3.6 There will be an average of 56 vehicle movements per day from the application site.*
>
> *6.3.7 the nitrogen dioxide concentrations measured at Haringey roadside in the years 1999 / 2000 / 2001 exceeds NAQS objectives by 25%. Nitrogen dioxide concentrations will exceed NAQS until about 2007.*
>
> *Air pollution Index statistics for the London Borough of Haringey (collected in Priory Park) for the period 30/03/04 – 09/07/04 showed High Bands of PM10 Particulate pollutants for an 8-day period."*

5.16 In terms of the London Concrete planning application, no mention has been made of the frequency of wheel cleaning on the cement trucks to prevent further distribution of dust and wet concrete, to what level the mixer trucks will be filled to avoid spillages, management of spillages on roads and what steps to reduce dust distribution while the aggregate is being delivered by road.

Concrete and Effects on Health

5.17 It is important to understand some of the potential impacts of concrete plant dust on health, based on various studies.

1. What's in cement that can be harmful?

Different cements have different ingredients. Many of them contain substances that can be hazardous, like silica, lime, gypsum, nickel, cobalt, and chromium compounds.

2. What illnesses can you get if you breathe too much cement dust?

- Chronic bronchitis;
- Silicosis— from the crystalline silica (quartz) used in many types of cement;
- Cancer— from the small amounts of chromium compounds found in some cements (scientists are still debating whether the silica in cement dust may also cause cancer.)

3*. What are the symptoms of silicosis?*

- Cancer— from the small amounts of chromium compounds found in some cements (scientists are still debating whether the silica in cement dust may also cause cancer.)

- Acute silicosis can occur after a few weeks of very high exposure (for example, in sandblasters). Symptoms are shortness of breath, coughing, fever, and weight loss.
- Chronic silicosis is rarely seen in workers with less than ten years of exposure. It permanently damages your lungs.
- Silicosis also increases your chance of getting tuberculosis.

Source: Published in June, 1994 by: Labour Occupational Health Program, School of Public Health, 2515 Channing Way, University of California, Berkeley, CA 94720. Phone: (510) 642-5507. http:www.cda.gov/elcosh/docs/d0200

5.18 Other studies indicate the following potential effects:

> "*Repeated inhalation of dust containing crystalline silica can cause bronchitis, silicosis (scarring of the lung) and lung cancer. In June 1997 crystalline silica was evaluated by the International Agency for Research on Cancer (IARC): Crystalline silica inhaled in the form of quartz or crystalline form from occupational sources is carcinogenic to humans (group 1)"*
>
> *Source: http//www.boral.com.au*

5.19 The Haringey Health Report of 2003 (http:www.beh.nhs.uk/haringeypct) cites the following:

- *" Hornsey (ward) still has the highest rate of ward admissions for childhood asthma, followed by….and Harringay"*
- *"The main cause of death amongst older people (over 65) in Haringey are circulatory disorders, cancer and respiratory illness"*

5.20 In addition, other work indicates that:

> *"Young people, the elderly and those who suffer from respiratory problems such as lung disease, asthma or bronchitis may be more sensitive to air pollution which may trigger an attack"*
>
> *Source: http:www.erg.kcl.ac.uk/london/information*

5.21 All this indicates that there is real potential for significantly increased adverse impacts of concrete dust on local air quality arising from this proposal and that the local residential area in which this concrete plant is to be located is particularly prone to the effects of such health risks.

Other Air Pollution Impacts

5.22 The findings of the Smith Grant Airborne Dust Assessment were that there was already a significant amount of dust in Cranford Way and that any additional dust created by London Concrete's operations would be insignificant. Smith Grant claimed that the measures to reduce or contain dust emissions from the concrete batching plant, use of dust extractors, fully enclosed aggregate bins and cement silos, washing down and sweeping the access roads regularly, would ensure that this would be so.

5.23 In terms of vehicle air pollution, Smith Grant were also confident that the use of modern diesel engines in the HGVs used by London Concrete would only result in a negligible increase in the already quite high levels of NO2 and particulate matter (PM10) in the area.

5.24 One source of dust, the 2700 – 4000 tonnes of aggregates to be delivered each week, was swept aside by SG (page 2, section 3.1): '*The importation and storage of aggregates on railway land constitutes permitted development and is not considered further in this assessment'.* This statement is not necessarily true - permitted development rights on railway operational land are given only to railway operators, not industrial firms such as London Concrete.

5.25 There was also no mention either of the vehicles used by builders calling in their own diesel vehicles to collect their own supplies of ready-mix concrete. A significant element of London Concrete's business is derived from this activity.

Lack of Effective Pollution Control

5.26 A report by the Readymix Concrete Company (RMC) comments that:

> '*Transport pollution, including carbon dioxide emissions, is not a function of engine design, fuel type, mileage and vehicle numbers. It is also, very significantly, related to the way a vehicle is driven'.*
>
> *Source: Readymix Concrete Company. Sustainable Development Report 2001*

5.27 While London Concrete management are no doubt sincere in their intentions regarding minimising the risk of contaminating the ground and air in the vicinity of the batching plant, by cement and other mineral dusts derived from the materials handled and transported, they cannot guarantee that spillage would not occur on a daily basis due to the volume of activity. Nor can they guarantee that all vehicles, including their own, will be so well maintained and driven that exhaust emissions will not produce unacceptable pollution levels. Mixer lorries driven at low speeds will entail low gears and high revving of engines, which will impact on both noise levels and exhaust emissions.

5.28 Against this background, cement dust in the vicinity of a batching plant and in neighbouring streets, due to spillage from vehicles was noted at the Battersea plant operated by London Concrete and has been complained about.

Health Effects of Airborne Dust and Diesel Emissions on Adults and Children

5.29 It is important to understand the key characteristics of the types of air pollution that could be generated by this concrete batching plant before examining its potential effect on health in this area. These are the components of diesel emissions and fugitive dust.

Diesel Emissions

5.30 The exhaust emissions from diesel powered vehicles are:

> *'… a mixture containing over 450 different components, including vapors and fine particles. Over 40 chemicals in diesel exhaust are considered toxic air contaminants by the State of California. Exposure to this mixture may result in cancer, exacerbation of asthma, and other health problems.*
>
> *'For the same load and engine conditions, diesel engines spew out 100 times more sooty particles than gasoline engines. As a result, diesel engines account for an estimated 26 percent of the total hazardous particulate pollution (PM10) from fuel*

combustion sources in our air, and 66 percent of the particulate pollution from on-road sources. Diesel engines also produce nearly 20 percent of the total nitrogen oxides (NOX) in outdoor air and 26 percent of the total NOx from on-road sources. Nitrogen oxides are a major contributor to ozone production and smog'.

Source: Exhausted by Diesel. National Resource Defence Council, April1998. Available from http://www.nrdc.org/air/transportation/ebd/ebdinx.asp

5.31 Some information on the effects of just two of the components of diesel exhausts on people is relevant at this point - Nitrogen dioxide and PM10 particulate matter.

5.32 Nitrogen dioxide is formed through the high temperature burning of fuel, principally from road traffic. This means that concentrations are greatest in urban areas where traffic levels are the highest. Other significant sources are power plants, heating plants and industrial processes. Nitrogen dioxide can potentially impact on health by irritating the lungs and lowering resistance to respiratory infections. It can also lead to ozone formation by reacting with volatile organic compounds in sunlight, and ozone can irritate the airways of the lungs and impair lung function.

5.33 Particulate matter refers to very small solid and liquid particles present in the atmosphere. The principal source of particulate matter in the UK is road traffic emissions, from petrol and diesel engines. PM10 refers to fine particles with a diameter of less than 10 micrometres (μm). These particles are of particular concern for health as they can be carried deep into the lungs where they can cause inflammation and worsening of lung and heart conditions. They can thicken blood and lead to an increased risk of strokes. Particulates may also carry surface-absorbed carcinogenic (cancer causing) compounds into the lungs. Further details are provided in Appendix 1.

Source: City and County of Swansea. Environment. August 2004

'Fugitive dust' Generated by Vehicle Movements

5.34 When vehicles move, the wheels can disturb any dust at ground level and the air movements caused by the passage of a vehicle can result in the particles being moved upwards and along. Over time, dust and particulate matter can travel considerable distances from their source. Smith Grant refer to this as 'fugitive dust'. As there are over 700 vehicle movements a day along the southern part of Cranford Way there will be constant disturbance and migration of dust and particulate matter. The local winds, which do not observe the same patterns as air movements at Heathrow (the nearest 'appropriate site' chosen by Smith Grant for the purposes of their evaluation of wind borne dust movements !!) can lift and carry airborne material a considerable distance from Cranford Way.

5.35 Smith Grant in discussing airborne dust (Page 3 section 4.2) admits that '*there is little screening in terms of airborne dust between the application site and the closest potentially sensitive receptors'*.

5.36 In this connection it should also be noted that any cement dust that does escape from the plant and is deposited on the nearby vegetation would cause considerable environmental damage after rain.

5.37 The 'Potentially sensitive receptors' referred to above should, no doubt, include the 2,000 or more children attending the eight schools within a 500 metre radius of the application site, many of whom live close by, and the hundreds of infants at the homes and nursery schools

within a 150 metre radius. Most of these schools are on, or very close to, the routes to be followed by the concrete carrying HGVs.

5.38 As Haringey Council's own Health Report for 2003 (available at http:www.beh.nhs.uk/haringeypct) states:

> *'Hornsey (ward) still has the highest rate of ward admissions for childhood asthma, followed by -… - and Haringey' and 'The main causes of death amongst older people (over 65) in Haringey are circulatory disorders, cancer and respiratory illness'.*

5.39 At one of the largest (1,300 pupils) secondary schools in the area, Hornsey School for Girls in Inderwick Road, just over 10% of students suffer from respiratory illness, primarily asthma. The school playing area is less than 200 metres from the application site and lies at a lower elevation.

Source: School Health Administrator

5.40 The extra movement of very large HGVs with the risk of heavy exhaust emissions and the potential for dust, including cement dust, to be blown from the site, is likely to trigger adverse reactions in children and adults with respiratory ailments. The longer-term implications for residents' health in this predominantly residential area can best be indicated by information from several authoritative sources, as set out below.

5.41 A March 2003 information note issued by the European Commission notes the following:

> *'During the last few years a substantial body of new scientific evidence has become available on the sources and the health effects of airborne particles. These new finding are presently reviewed by the WHO to assist the European Commission…'*
>
> *'Airborne particulate matter (PM) is associated with a number of health effects: increased mortality, increased emergency hospital admissions for cardio-pulmonary disease, increased frequency of chronic bronchitis, chronic obstructive pulmonary disease (COPD) and increased risk of lung cancer. Specifically for children a number of studies shows reduced lung function, asthma exacerbation, bronchitis and sinusitis due to PM exposure. Also increased infant mortality has been reported for areas with high levels of PM'.*
>
> *'At the present levels of PM in Europe the most significant effects are increased mortality and increased morbidity such as increased frequency of hospital admissions for cardio-pulmonary disease. There is no apparent threshold for the health effects due to exposure to PM. Therefore no safe level may be defined for which there are no effects'.*
>
> *Source: Information Note: Airborne particles and their health effects in Europe. (European Commission, Directorate-General Environment. Brussels, March 2003).*

5.42 Work by Dr. R Bertollini, Director of the Health Determinates Division of the World Health Organisation (WHO) was reported by BBC News Online on 23 June 2004. This related to a systematic review by a WHO team of recent research on the effects of air pollution on children's health and development. A paper circulated at a conference of European health and environment ministers summarised the team's conclusions: *"Findings of various population-*

based studies are supported by animal exposure studies, indicating that intrauterine as well as post-natal exposures to pollutants can lead to impaired lung growth."

5.43 Although pollution has been known to cause some other forms of growth retardation in the unborn, this is believed to be the first confirmation of damage to the lungs of foetuses. Dr Bertollini's noted:

> "*This is a very important finding, and the consistency between the animal studies and those on people gives it greater strength.*
>
> *The pollutants studied in the research were particulates, 60-70% of which come from vehicles, with diesel engines particularly dangerous.*
>
> *We need to push policymakers to act: this is an overall issue of transport and mobility which now needs to be addressed urgently.*
>
> *Very drastic policies to reduce traffic or cut speed limits have produced results in some European city centres.*
>
> *I think congestion charging, which London has introduced, can be a useful tool.*
>
> *Paradoxically, introducing cleaner engines is not a solution, because the increase in traffic means the pollutant levels remain pretty stable."*

5.44 This WHO paper also says there is now "substantial" evidence about the harmful effects of air pollution on pregnancy and infant health. It says the evidence is enough to infer a causal relationship between particulate pollution and respiratory deaths in infants in their first year of life. It concludes "*The amount of ill-health attributable to air pollution among European children is high... current knowledge about the health effects of air pollution is sufficient for a strong recommendation to reduce children's current exposure to air pollutants, in particular to the pollutants related to traffic."*

Source: BBC News Online. 23 June 2004.

5.45 The European Commission 'Information Note' noted above also highlights the recognition that there is now 'no safe level' which can be defined 'for which there are no effects'. The WHO warning is also significant in this matter. Thus the statistical exercise carried out to prove that the London Concrete contributions to PM levels in Haringey would be negligible are not really relevant. No responsible Government or Council would wish to allow any increase in air pollution and should ensure that all policies to reduce it should be put into effect.

Conflict with Haringey's planning guidance on Air Quality

5.46 The Haringey UDP states:

3.15: '*The Council will control potential pollution resulting from development in the borough by:*

c) Separating potentially polluting activities from sensitive areas (green belt or MOL) or uses (schools, hospitals, homes); '

5.47 Additionally, Haringey's Supplementary Planning Guidance on Air Quality states:

> *'The Government's National Air Quality Strategy for the UK sets out air quality standards for seven key pollutants. The Council has carried out a three stage review and assessment for air quality in the borough based on the Government's standards for the key pollutants. The results show that in Haringey the Government's standards for PM10 (dust particles) and oxides of nitrogen (NOX) will not be met by the required date (PM10 – 2004 and NOX 2005), mainly due to traffic emissions. Therefore action needs to be taken to improve air quality in Haringey, especially in relation to PM10 and NOX.*
>
> '*Haringey has declared the whole borough as an Air Quality Management Area (AQMA) and a draft action plan has been prepared which sets out to improve air quality. Actions covered in the draft action plan relate to four main areas:*
> - *Action to reduce emissions from vehicles*
> - *Action to reduce traffic volumes*
> - *Actions to reduce emissions from non-road traffic sources*
> - *Awareness raising, education and public information.'*

5.48 Within the same guidance (section 9.1) there are guidelines relating to use of planning conditions or obligations to improve air quality. Of those conditions that are relevant to this application, such as restrictions on certain types of vehicles, measures to minimise emissions, and submission of a full emissions inventory, it is difficult to see how any could be applied effectively to the current London Concrete proposal. For example, how would emissions be reduced except by a reduction in the number of vehicle movements?

5.49 Approving this application would therefore appear to conflict with Haringey's air quality aims.

5.50 In summary, in terms of an Environmental Impact Assessment, this report does not properly establish the "baseline" (current) conditions. This undermines the applicant's assessment of likely air quality effects, and their report offers no real mitigation measures and certainly does not offer any upper limits of dust/air quality below which the plant would be obliged to operate.

5.51 In addition, based on recent research and reports by various highly authoritative sources, the types of air quality impacts this proposal is likely to generate in the local area – Nitrogen Dioxide and PM10 particulates from diesel emissions and fugitive dust from plant operations or transport of materials – can result in high health risks in the adjoining residential area which contains several schools.

5.52 The proposed development will not improve the quality of life for people in Haringey – the stated aim of the Better Haringey programme set out in Chapter 3. Asthma sufferers, babies, children, the elderly, cyclists, pedestrians and motorists will all be at risk from the factory and its associated operations.

5.53 Given this background, the development site is also dangerously close to the children's play area in front of Chettle Court. Preserving the safety and well-being of the habitat and foraging ground of the Borough's young people should also be a priority for the Council.

5.54 Overall, this means that inadequate information is provided on the effects of the proposals on residential amenity and the Council should not determine the application on this basis, until further information is provided and proper mitigation measures that can be enforced have

been put forward and evaluated. It also suggests that the impacts of the proposals on air quality and health have the potential to be significantly greater than indicated by the applicant and provide grounds for refusal of these proposals to introduce potential health risks into a residential area.

6.0 LONDON CONCRETE OPERATIONS ELSEWHERE

6.1 This Chapter provides information on the experience of London Concrete's concrete plant operations elsewhere in London, drawing on several case studies and discussions with local residents in the areas adjoining such plants.

6.2 As part of its proposals for a concrete batching plant at the Ferme Park Depot, London Concrete Ltd makes a number of commitments concerning its operation of the plant. These range from promises to control dust emissions through to limits on the number of mixer trucks servicing the plant.

6.3 But, in the light of the evidence of case studies presented below, there are grave concerns over whether London Concrete can be relied upon to view the concerns of local residents and the environment to be as important as its own commercial needs.

London Concrete in Tolworth

6.4 London Concrete applied to build a batching plant at Tolworth & Hook Rise, in the Royal Borough of Kingston upon Thames, in 2003. But the company's proposal was incomplete. It contained details of the batching plant operation only. Details of the proposed method of transferring aggregates from train to batching plant were not initially supplied by the applicant, nor were the railway sidings or the aggregate delivery area included on the application site.

6.5 Upon analysing the proposals, the Council requested changes to all the above. The applicant agreed, then changed its mind and reverted to the original application. What follows is an extract from the minutes of the Council meeting where the application was discussed:

> *"When the application was first submitted details of the proposed method of transferring the aggregates from the trains to the batching plant were requested and it was requested that the aggregates operation be included within the application site, as it is considered that it is an integral part of the proposal.*
>
> *The applicants agreed with this request and submitted a revised application site boundary together with details. However, since then, the applicants have changed their view and reverted to the original site boundary for the proposed concrete batching plant and confirmed that details of the method of access for the aggregates from the trains across the depot site to the application site and the concrete batching plant would not form part of this application, which is considered to be most unsatisfactory.*
>
> *It is considered relevant and important to know how and whether the sidings will be adapted so that bottom discharge railway wagons can be used for aggregates together with conveyers rather than front-end loaders to move aggregates to the concrete plant.*
>
> *It would also be preferable for the bottom discharge operation to take place within a covered area, as at the Wembley plant to reduce noise and airborne dust pollution.*
>
> *However the applicant has confirmed that the reinstatement of the sidings for the delivery of aggregates does not form part of this application, nor does the delivery, transference of the material from the trains to the storage facilities, or stockpiling of the aggregates.*

The applicant considers that these activities can legitimately be carried out under permitted development rights, by virtue of Class A of Part 17 of Schedule 2 to the 1995 General Permitted Development Order.

The noise disturbance created by these aspects of the concrete batching operation, including the unloading of trains and movement of aggregates around the site, are not therefore considered by the applicants in their noise report, which is unsatisfactory."

6.6 A full copy of these minutes can be found on Green N8's website at *http://www.greenn8.org.*

6.7 It is also worth noting that, in its Tolworth submission, the applicant acknowledged that:

- the plant might increase dust levels in the area, particularly within 200m of the site. It follows that this applies in Crouch End as well, although the official line from London Concrete is that there will be a negligible increase.

- the level of dust nuisance resulting from their 1998-2000 aggregates operation at the site was above that which they would 'ordinarily consider acceptable.' The company claimed that this was because the operation was established at short notice in order to fulfil the requirements of the Croydon Tramlink project and therefore no dust suppression measures were used.

6.8 But this is not the only time London Concrete, or its parent group, have failed to apply dust suppression measures, as illustrated by the actions of London Concrete's parent company in Barrow.

London Concrete's Parent Company in Barrow

6.9 London Concrete's parent company, Aggregate Industries, was found guilty of operating a concrete batching plant in Barrow without adequate authorisation. Following complaints of dust nuisance, the company was found to be operating without the required dust suppression equipment and was fined £13,000.

6.10 This is precisely the sort of equipment the company says it will use in its Ferme Park Depot site. Can it be trusted to implement it properly here? There must be serious doubts about this. The full story is set out below:

Aggregates business fined for unauthorised LAPC process.

One of the UK's leading aggregates businesses, Aggregate Industries, has been fined £13,000 after operating a new concrete batching plant without an authorisation. The fine was imposed by Barrow Magistrates in August after the company pleaded guilty to operating a concrete batching plant in Barrow without a local air pollution control authorisation in breach of the EPA.

The Court was told that Barrow-in-Furness Borough Council had advised the company that an authorisation would be required. Following a complaint of dust nuisance, officers from the Council found that the company had built and was operating the plant without authorisation. The cause of the dust was that the plant was also being operated without any dust suppression equipment.

Source:http://www.clarkewillmott.com/sectors/property/introduction/bulletins.html?Article=665

London Concrete in Battersea

6.11 Dust is also a major concern for the residents of Battersea, where London Concrete achieved planning permission to build a batching plant on appeal in 1999. Despite the same promises there regarding dust control and suppression, residents close to the site report a discernible increase in dust levels since that plant has started to operate.

6.12 Another major concern is the congestion and pollution caused by the mixer trucks travelling to and from the Battersea site. In its original application, London Concrete agreed to limit the number of trucks in use to four. This concession was critical to the success of the application at the time – but just three years later, the company applied for this limit to be doubled. So far, it has been unsuccessful thanks to local resident resistance and the strength of the local Council.

6.13 Indeed, Battersea residents have won several victories over London Concrete since the plant has been operational:

- Concerned that the mixer lorries were driving fast and recklessly (drivers are rewarded with bonuses for completed trips), the campaigners noted and complained about spillages of ready mix on the roads and pavements in the neighbourhood. These spillages, once dried, create extra dust which is dispersed by passing traffic and wind. Spillages were deemed to be caused by over-loading mixer trucks. Campaigners insisted that trucks were loaded to no more than 3/4 capacity to minimise this problem.

- Drivers were arriving and leaving the site outside agreed working times. The campaigners monitored the movements and alerted the local police. Offending trucks were then regularly apprehended and returned to the site until it was officially open.

- Wagons were travelling uncovered, adding to the dust problem and also problems with large stones dropping onto the public highway. Again, campaigners alerted LC and at their insistence, wagons are now covered.

- Campaigners insisted on regular wheel washing of trucks connected with the concrete process. This procedure has been adopted by other companies using the industrial estate and this has improved the general cleanliness of the area.

6.14 In truth, the Battersea residents should not have needed to win any of these battles because London Concrete should have been alive to the problems its operations were causing. It was not. So residents had to spend their valuable time policing these misdemeanours and bringing London Concrete and its business partners to book.

Conclusions

6.15 These three case histories leave the residents of Crouch End with deep misgivings. Residents have grave doubts about the assurances made by London Concrete in this application over everything from the proposed plant's opening hours to the likely number of trucks that will service the plant via Crouch End's already congested roads. These experiences clearly indicate a company whose operations will need policing rigorously, and that any permission eventually granted be made subject to stringent planning conditions and Section 106 obligations.

7.0 CONFLICTS WITH PLANNING POLICY

7.1 This section examines how well the proposed development accords with the adopted and emerging local development plan for the area – the Haringey UDP. It draws together some of the analysis on policy conflicts set out in earlier chapters.

7.2 Section 54A of the Town & Country Planning Act 1990 makes clear that the development plan is the starting point for consideration of planning applications and that proposals in accord with this plan should be approved unless other material considerations indicate otherwise.

7.3 Within both the 1998 adopted UDP and the 2003 Deposit UDP, the application site lies within an area designated as a Defined Employment Area (DEA) and shown as lying immediately beside an Ecological Corridor to the east and a Site of Local Nature Conservation Importance to the south. The following sections assess the proposed development against relevant policies of these UDPs and national planning policy guidance. As the Deposit UDP has reached an advanced stage, its policies are referred to below, unless materially different from the adopted UDP policies

7.4 Policy OS5 resists development adjacent to sites of nature conservation value or ecological importance unless the development will not cause adverse effects on the ecological value. It also aims to protect the ecological value of ecological corridors and promotes enhancement of their green nature.

7.5 As Chapter 3 of this document indicates, the proposals do nothing to enhance the value of the site of nature conservation important adjoining the application site. Indeed, it is likely that the dust effects will adversely affect the food chain of wildlife in an area of ecological value while noisy unloading and operational activity will also harm such wildlife and discourage them from the area. The reported presence of bats in this location is particularly important while the inadequacy of the ecological assessment information provided by the applicants makes it impossible to understand the impacts fully. On this basis, the proposals must be considered to conflict with Policy OS5.

7.6 Deposit Policy OS15 aims to protect Green Chains, which are indicated as including areas of nature conservation importance. At the same time, Policy OS10 aims to ensure biodiversity in the Borough is not diminished in any form by development.

7.7 As chapter 3 of this document makes clear, the proposals are likely that the dust effects will adversely affect wildlife in this area. Similar considerations apply as discussed under Policy OS5 above, and again the proposals must be considered to conflict with these policies also.

7.8 Deposit Policy ENV5 aims to control pollution from developments by measures including separating potentially polluting uses from sensitive areas such MOL, schools, and homes, and requiring them to include mitigation measures to reduce polluting emissions. Accompanying text notes that planning conditions or planning agreements will be used to reduce such impacts, including controls on hours of use.

7.9 As highlighted in Chapters 4-6 of this document, the proposed development will potentially result in significant pollution impacts on nearby sensitive areas including two schools, a local park, residential properties very close to the site and an immediately adjoining site of nature conservation importance. These impacts may include significant increase in traffic generation,

particularly HGVs, increases in noise levels, worsened air pollution from both vehicle emissions and fugitive dust and resultant effects on health of residents, in an area already suffering from such effects. The application site, despite being within a DEA, is not adequately separated from such sensitive uses. There would therefore be a clear conflict with this policy.

7.10 Deposit Policy M7 seeks to retain rail freight transport facilities and provision of additional facilities provided these do not give rise to undue local environmental disturbance, and accompanying text notes that individual cases must be considered on their merits due to potential for local lorry movements as freight is transferred between different transport modes.

7.11 The proposals can be considered to provide additional rail freight transport facilities or make more intensive use of existing rail sidings. However, it is clear from the preceding Chapters of this document that a range of types of undue environmental disturbance is highly likely. Not least would be the increase in lorry movements as cement (or its components) is transferred from rail to road. There is therefore a clear policy conflict in this regard also.

7.12 Policy EMP2 aims to protect DEAs for employment generating uses. Policy EMP5 supports proposals for employment generating development within DEAs provided that, for sites on the edge of a DEA, they do not inhibit the continuing operation of existing employment generating uses or compromise the employment status of the area.

7.13 In relation to this Policy, the traffic generation and air quality impacts of the proposed development may well inhibit the continuing operation of existing firms in the Cranford Way Industrial estate. Adverse changes in air quality and particularly dust may have important consequences for the operation of food related businesses in the estate such as the bakery products and cold meat distributors. If such effects were to lead these firms to move out, these are larger employers than the 10-12 jobs estimated to come with the concrete plant, and the local employment effects would be significant.

7.14 In addition, there may be longer term implications for the industrial estate and local employment. At present, the estate contains predominantly storage and distribution uses, which do not appear to generate large volumes of traffic or involve polluting operations in terms of noise or air quality. The introduction of a concrete plant, which posses some of these characteristics, could change the character of the industrial estate over time, if it encourages “cleaner” industries and those more sensitive to dust etc to relocate elsewhere and deters other such industries from moving in to replace them. Over time, this could result in an industrial estate suited only to, or at least more likely to attract, noisier, dustier operations such as a concrete batching plant. This could not only lead to a change in the type of local employment available but may also reduce the attractiveness, occupancy levels and hence overall employment on the estate. In addition, the estate itself would then become noisier, dustier and with more air quality impacts, affecting the environment of the surrounding residential area.

7.15 There would therefore be a clear conflict with Policy EMP2

7.16 *Also of relevance are policies EMP3.2 and EMP3.4 of the Adopted UDP. The first indicates that the Council normally seeks to relocate bad neighbour businesses except where these give rise substantial nuisance by way of noise, fumes or other pollution or by traffic generation. The second policy notes that the Council encourages employment activity that is environmentally sensitive, including in relation to minimisation of pollution*.

7.17 In relation to these policies, the proposed development appears on the basis of the earlier Chapters of this document likely to exhibit some of the bad neighbour characteristics identified and not to be an environmentally sensitive employment activity. On this basis, the application would conflict with these policies if allowed to locate in an environmentally sensitive area, as is now proposed.

7.18 Deposit UDP Policy UD7 requires development proposals to take account of the function of adjacent roads and not adversely affect the operation of roads in the area.

7.19 As indicated in Chapter 4, the proposals will generate a significant increase in heavy goods vehicle traffic on Tottenham Lane, which is already subject to congestion at peak times. There must be some risk that the London concrete proposals will adversely affect the operation of this road, which is classified as a London Distributor by the UDP. Although it is difficult to identify a clear conflict with this policy on the basis of information currently available, the proposals cannot be considered to accord fully with it.

7.20 Government Planning Policy Guidance Note PPG13: Transport generally supports use of rail to transport freight but also makes the following points: 'In determining planning applications, local authorities should … where possible locate developments generating substantial freight movements such as distribution and warehousing, particularly of bulk goods, away from congested central and residential areas, and ensure adequate access to trunk roads……Policies need to strike a balance between the interests of local residents and the wider community, including the need to protect the vitality of urban economies, local employment opportunities and the overall quality of life in towns and cities.'

7.21 In relation to PGG13, the use by the proposed plant of rail to transport aggregates is supported. However, this is outweighed by the other considerations. Specifically, the proposed plant would not be sited away from congested residential areas, and does not have adequate access to trunk roads. Nor, with only 12 jobs likely from it, does the proposal strike an adequate balance between the interests of Crouch End local residents and the wider community, including the need to protect local employment opportunities and the overall quality of life in Crouch End. On balance, the application therefore conflicts with Government guidance in PPG13.

7.22 Drawing this analysis together, the proposed development provides an employment generating use within a Defined Employment Area of the UDP, where such uses are generally supported. There is also general support for increased use of rail transport for freight in national policy guidance.

7.23 However, this degree of accord with the UDP is outweighed by conflicts with a range of other UDP policies and Government Planning Guidance. There are specific conflicts identified above with Deposit UDP Policies ENV5, OS5, OS10, OS15, M7 and MP2 as well as with PPG13. Other material considerations that should be taken into account are World Health Organisation and European Commission research or guidelines health impacts from the type of development considered here.

7.24 In this case, the weight of adverse material considerations must override the limited extent to which the proposed development complies with the development plan for the area. On the basis of Section 54A of the Town & Country Planning Act 1990, the application should therefore be refused.

8.0 PLANNING CONDITIONS & OBLIGATIONS

8.1 The preceding sections identify adequate reasons to justify refusal of this planning application for a concrete batching plant.

8.2 However, if despite these reasons to the contrary, Haringey Council resolve to approve this approval, then it is clear that strict conditions and legal agreements should be applied to control the future operation of this plant in order to protect the amenity and health of nearby residential and business premises as well as environmental interests.

8.3 This strict approach was considered necessary when concrete batching plants of this type have been permitted on appeal in areas with a less residential character than Crouch End. The types of conditions and planning obligations that the Council should apply in this case should be no less rigorous than in these other schemes. The minimum specific conditions that should be applied, and the reasons for them, are set out below. These reflect conditions that the Planning Appeal Inspector felt necessary to impose on London Concrete's Battersea concrete plant.

1. All loading or unloading of goods and fuel into or from vehicles arriving at or departing from the site shall be carried out within the perimeter of the cross-hatched area of the site as indicated on Plan…;

   Reason: To protect residential amenity and adjoining areas of nature conservation importance.

2. The concrete batching plant hereby permitted shall not operate or receive deliveries outside the hours of 0700 to 1900 on Mondays to Fridays inclusive and 0800 to 1300 on Saturdays;

   Reason: To protect residential amenity.

3. The use hereby permitted shall not include any aggregate crushing or concrete recycling and no such activity shall take place on the site;

   Reason: To protect residential amenity and adjoining areas of nature conservation importance.

4. Aggregates including sand shall only be transported to the site by rail, and not by any other means of transport without the prior written approval of the local planning authority;

   Reason: To protect residential amenity and avoid adverse impacts on the local highway network.

5. Details of site and vehicle cleaning measures and procedures shall be submitted to and approved in writing by the local planning authority. Such measures and procedures shall be put into effect prior to the use commencing on site and shall continue for the duration of the use;

   Reason: To protect residential amenity and adjoining areas of nature conservation importance.

6. Details of wheel washing and vehicle cleaning facilities shall be submitted to and approved in writing by the local planning authority. Such facilities as are approved shall be installed on site prior to the hereby permitted use commencing and shall be retained thereafter for the duration of the use;

Reason: To protect residential amenity.

7. Other than in types of emergency situations which are agreed in writing beforehand by the local planning authority, a maximum of 4 operational mixer trucks shall be based at the concrete batching plant site at any one time and all concrete deliveries from the plant shall be restricted to these vehicles alone with no vehicles based outside the plant being used for delivery purposes;

Reason: To protect residential amenity and avoid adverse impacts on the local highway network.

8. The part of the site show cross-hatched on Plan ….. shall only be used for the purposes of a concrete batching plant and for no other purpose including the handling and distribution of aggregates without the prior written approval of the local planning authority;

Reason: To protect residential amenity and adjoining areas of nature conservation importance.

9. The concrete batching plant to be erected on the application site shall be an [specify type] concrete batching plant or such other plant as shall be agreed in writing with the local planning authority.

Reason: To protect residential amenity and adjoining areas of nature conservation importance

10. Notwithstanding the applicant's proposals to contain dust from industrial processes through the design of the concrete plant, details of measures to suppress and control dust from operations and from vehicle transportation and loading shall be submitted for approval and agreed in writing with the local planning authority before any operations commence on site.

Reason: To protect residential amenity and adjoining areas of nature conservation importance.

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8.4 Consideration should also be given to removing by planning condition any permitted development rights that could be interpreted as allowing for importation and storage of aggregates on railway land, even though London Concrete are not a railway operator in terms of Part 17 of the Town & Country Planning General Permitted Development Order 1995.

8.5 Finally, if necessary and if separate planning permission would not be required for such works, conditions should be imposed to prevent use or creation of any access to the site by cement vehicles other than from Cranford Way and Tottenham Lane. This would avoid any possible creation of a new access to the site off Uplands Road that would bring large vehicles through residential roads.

8.6 Given the experience of London Concrete's operations and approach to planning matters in other areas, the Council needs to ensure that such planning conditions cannot be subsequently removed or weakened through the planning appeal process. It is therefore appropriate that certain of the above proposed controls are required to be incorporated in an Section 106 Legal Agreement to run with any planning permission that may granted. The Council is urged to take this approach with the above condition numbers 2, 3 and 4 in particular.

9.0 OVERALL CONCLUSIONS

9.1 Based on the analysis in the preceding sections, the following conclusions can be drawn.

General Principles

9.2 The proposed concrete plant, although sited within a defined employment area, will lie close to sensitive uses such as housing, schools and a park and will immediately adjoin an area of nature conservation importance. This is not an appropriate location for an industrial operation of this type, which is not normally found in residential areas.

9.3 The siting of a heavy industrial processing plant in the heart of a family-orientated, residential area is totally inappropriate and out of keeping in a part of the borough defined in Haringey's UDP as: *"a predominantly residential area with the borough's heaviest concentration of conservation areas. The priorities in this area are ones of environmental management, improving the quality of life and its environmental assets such as its attractive open spaces."*

Nature Conservation

9.4 The proposed development is likely to significantly harm the adjoining local area of nature conservation importance as a result of dust from the operations and dirty run-off water produced when vehicles and facilities are washed out. This will contaminate the area and threaten the existence of plant-life and small invertebrates that form a vital part of the food chain for birds, bats and other species.

9.5 Increased activity at the trackside and sidings, such as the unloading of aggregates and clearance of much vegetation on and around the site, will endanger any ecological activity in this green corridor and discourage further use by existing species. Allowing the development will not contribute to achieving the stated aims of Haringey's Biodiversity Action Plan, which is *"to conserve, enrich and celebrate the wildlife in Haringey."*

9.6 In any event, the lack of an up-to-date species list or bat roost survey for this area makes it impossible to assess the full extent of the impact on animal life on the basis of ecological information supplied by the applicant. Further detailed ecological studies are required before a decision on this proposal can be safely made.

Noise Effects

9.7 With regard to noise issues, the survey of current background noise conditions submitted by the applicant is inadequate and misleading, and any conclusions drawn on the basis of it as to the current background noise levels at the actual receptor points must be extremely doubtful. This information does not provide an adequate basis to determine this application.

9.8 Even using the inadequate SRP survey figures, the effect of concrete plant activities on the noise climate of the area will be significant. Residents estimate that the addition of existing noise sources to the noise from site activity could result in an overall noise increase of 7-10dB on this site. This is a very significant increase as a 10dB increase is perceived as a doubling of loudness.

Transport/Traffic Impacts

9.9 The London Concrete proposals for 56 HGV movements would represent an increase in large and heavy vehicle movements along Tottenham Lane of 17.2%, not 5.6% as the applicant's figures indicate.

9.10 The overall impact of London Concrete-generated increase in traffic, taking into account the contractors collecting with their own vehicles, will be an increase of 16% in MGV/ HGV activity alone, along Tottenham Lane - a figure well in excess of the 10% threshold required to trigger consideration of whether or not further investigation is required.

9.11 The forecast increase in HGV traffic as a result of the concrete plant proposals will hamper the efficiency of local bus services. The increase in HGV traffic will also affect both walking and cycling, for which it will mean increased air pollution. With regard to younger pupils from the eight schools in the area, parents will be concerned about safety, as well as the impact of air pollution on the health of their children, especially those with asthma. In these conditions, parents will be less likely to allow their children to walk or cycle to school, and will drive them, in turn adding further to traffic congestion and air pollution.

9.12 The additional HGV traffic generated on already congested roads as a result of the proposed plant, and the further deterioration of air quality, will contribute to a downgrading of the area. Both Crouch End and Hornsey could see reduced levels of service industry investment and even a reversal to the currently thriving local economy as it becomes perceived as a less attractive environment in which to live. Eventually Crouch End and Hornsey will become a less desirable area for both business and residents.

9.13 These factors are not outweighed by the proposed sustainable use of rail to transport aggregates. It needs to be emphasised here that deliveries by cement tankers to the site 2-3 times daily (4-6 movements daily) are anticipated over 2-3 years, until rail access is available.

Air Quality, Pollution and Health Issues

9.14 The applicant's submitted information on airborne dust does not properly establish the "baseline" (current) conditions. This undermines the applicant's assessment of likely air quality effects, and its report offers no real mitigation measures and certainly does not offer any upper limits of dust/air quality below which the plant would be obliged to operate.

9.15 In addition, based on recent research and reports by various highly authoritative sources, the types of air quality impacts this concrete plant proposal is likely to generate in the local area – Nitrogen Dioxide and PM10 particulates from diesel emissions and fugitive dust from plant operations or transport of materials – can result in high health risks in the adjoining residential area which contains several schools.

9.16 The proposed development will not improve the quality of life for people in Haringey – the stated aim of the Better Haringey programme set out in Chapter 3. Asthma sufferers, babies, children, the elderly, cyclists, pedestrians and motorists will all be at risk from the factory and its associated operations. The proposed plant is also dangerously close to the children's play area in front of Chettle Court. Preserving the safety and well-being of the habitat and playing areas of the Borough's young people should also be a priority for the Council.

9.17 Overall, this means that inadequate information is provided on the air quality and dust effects of the proposals on residential amenity and the Council should not determine the application

on this basis, until further information is provided and proper mitigation measures that can be enforced have been put forward and evaluated. The impacts of the proposals on air quality and health have the potential to be significantly greater than indicated by the applicant

9.18 The whole borough of Haringey has been declared an Air Quality Management Area (AQMA) by the Council and a draft action plan prepared to improve air quality, including actions to reduce emissions from vehicles, reduce traffic volumes, non-road traffic sources. Approving this application would therefore appear to conflict with Haringey Council's air quality aims.

Economic Impacts

9.19 Adverse changes in air quality and particularly dust may have important consequences for the operation of food related businesses in the estate such as the bakery products and cold meat distributors. If such effects were to lead these firms to move out, these are larger employers than the 10-12 jobs estimated to come with the concrete plant, and the local employment effects would be significant.

9.20 In addition, there may be longer term implications for the industrial estate and local employment. The introduction of a concrete plant could change the character of the industrial estate over time, if it encourages "cleaner" industries and those more sensitive to dust etc to relocate elsewhere and deters other such industries from moving in to replace them. Over time, this could result in an industrial estate suited only to, or at least more likely to attract, noisier, dustier operations such as a concrete batching plant. This could not only lead to a change in the type of local employment available but may also reduce the attractiveness, occupancy levels and hence overall employment on the estate.

Experience of London Concrete Operations

9.21 Case histories of London concrete's operations elsewhere in London, including with modern batching plants as proposed here, raise deep concerns. Crouch End residents have grave doubts about the assurances made by London Concrete in this application over everything from the proposed plant's opening hours to the likely number of trucks that will service the plant via our already congested roads. This emphasises the importance of strict controls in the event that any plant is approved and supports refusal of this proposal where it is clear that such controls cannot be properly enforced or are unlikely to be complied with.

Need for the Development

9.22 Based on information obtained from other concrete companies, a new plant is not needed in this location to serve the Haringey construction market. There is therefore no overriding need for this development in this location that should outweigh its adverse impacts.

Conflict with Planning Policies

9.23 The concrete plant proposal conflicts with a range of UDP policies and Government Planning Guidance, particularly Deposit UDP Policies ENV5, OS5, OS10, OS15, M7 and MP2 as well as with PPG13. The balance of adverse factors overrides the limited extent to which the proposed development complies with the development plan for the area. On the basis of Section 54A of the Town & Country Planning Act 1990, the application should therefore be refused.

APPENDIX 1: Additional Information on Particulate Material

So why is there so much fuss about it now? Simply because PM10 may well be killing 10,000 British people prematurely every year, which makes it far more serious a problem than any other pollutant. Joel Schwartz, a US researcher who has found clear associations between exposure to fine particles and death from respiratory and cardiac disease, has described it as potentially Britain's greatest environmental problem.

As PM10 can travel great distances the true figure may be higher. It is not entirely clear why very fine particles are so dangerous, although a recent paper in The Lancet (21st Jan) suggests that the immune system may be reacting to them as if they were invading organisms. This immune response causes inflammation of the tissues in a similar manner to the allergic reaction of a hay-fever sufferer, but with ultra-fine particles the inflammation is deep in the lungs.

University of Birmingham, *'PM10 - Britain's Biggest Environmental Problem?',*
available from, http://web.bham.ac.uk/c.m.tarpey/news495/pm10.htm

APPENDIX 2: DETAILS OF BAT SPECIES IN AREA OF THE APPLICATION SITE

[Information awaited and to be provided later]