

PLANNING APPLICATION FOR  
CONCRETE BATCHING PLANT  
FERME PARK DEPOT,  
CRANFORD WAY, HORNSEY

APPLICATION NO. HGY/2004/1265

## SUMMARY OF OBJECTIONS

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## EXECUTIVE SUMMARY

1. This document provides a summary of the objections, by the GreenN8 Crouch End and Hornsey residents group, to the planning application by First Plan Ltd on behalf of London Concrete for a concrete batching plant at the Ferme Park Depot, Cranford Way in Hornsey.
2. A detailed statement of objections has been submitted to Haringey Council Planning Department which comments on information supplied by the applicants in support of the application, assesses likely impacts of the proposed development and identifies conflicts between the proposal and the Haringey UDP and other Council policy aims. A petition with over 1,500 residents' signatures opposing the application has also been submitted to the Council.
3. The key areas of objection are summarised below under a number of main topic headings. These points are supported by detailed analysis and information sources in the main statement of objections document.

### **General Principles**

4. 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 would not normally be found in residential areas.
5. Furthermore, the siting of an 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**

6. 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.
7. 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."*
8. 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. With regard to noise issues, the survey of current background noise conditions submitted by the applicant is inadequate and misleading. The applicant's report fails to truly assess the local noise climate at sensitive receptor points. More work is required to quantify the true effect of this noisy development proposal on existing local sensitive developments, and any conclusions drawn on the current report 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 and further information on this issue should be required from the applicant before a decision can safely be made on the application.
10. Even using the applicant's inadequate noise survey figures, the effect of concrete plant activities on the noise climate of the area will be significant. The plant's operation could increase background noise levels at Chettle Court by between 7 & 10dB - a significant change as a 10dB increase is perceived as a doubling of loudness. During filling operations it will be extremely noisy with levels at some 30dB above the background noise level. As the calculated site noise emissions are time and event averaged they are particularly sensitive to increased levels of activity
11. The proposal does not comply with Planning Policy Guidance PPG24 "Planning & Noise", with the Mayor's Ambient Noise Strategy (MANS) or the Haringey UDP.

### **Transport/Traffic Impacts**

12. The London Concrete proposals for 28 Heavy Goods Vehicle (HGV) deliveries (or 56 vehicle movements) would represent an increase in large and heavy vehicle movements along Tottenham Lane of 17.2%, rather than the figure of 5.6% indicated by the applicant. Tottenham Lane is already congested at peak times, a situation exacerbated by manoeuvring and exiting of large vehicles from the Cranford Way industrial estate.
13. Taking into account the contractors collecting with their own vehicles, the overall impact of London Concrete-generated increase in traffic will be an increase of 16% in HGV and (Medium Goods Vehicles (MGV) activity alone, along Tottenham Lane - a figure still well in excess of the 10% threshold required to trigger consideration of whether or not further investigation is required.
14. Contrary to the company's claims, 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. The applicant has not made an evaluation of the impact of their own HGVs, and of contractors' vehicles collecting concrete, on the already congested and narrow roads through public transport routes, shopping, services and residential areas which these vehicles will have to traverse.
15. London Concrete's claims that HGV movements in Haringey would be reduced if their batching plant were built at Cranford Way are spurious. At present there are few daily movements of ready-mix concrete vehicles in Haringey and no movements of aggregates through Haringey by road.
16. 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 8

schools in the area, parents will be concerned about safety, as well as the impact of air pollution on the children's health, 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 local traffic congestion and air pollution.

17. 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.
18. These factors are not outweighed by the proposed sustainable use of rail to transport aggregates to the site.

### ***Air Quality, Pollution & Health Issues***

- 1.1 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.
  - 1.2 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.
  - 1.3 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. A significant number of school children will be close enough to this proposed plant for their health to be adversely affected by the increase in airborne dust and PM pollution generated by their plant and associated HGV traffic. 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.
19. 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
  20. 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, and reduce emissions from non-road traffic sources. Approving this application would therefore appear to conflict with Haringey Council's air quality aims.

### ***Economic Impacts***

21. 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.
22. 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 possesses 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.

### ***Experience of London Concrete Operations***

23. 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***

24. 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***

25. 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.

### ***Planning Conditions & Obligations***

26. It is considered that there are sufficient grounds outlined above to justify refusal of this application. However, given the experience of London Concrete's operations and approach to planning matters in other areas, in the event that any planning permission is granted, the Council needs to ensure that appropriate planning conditions are imposed to control future operations and protect the amenity of both local residents and nearby businesses. It is also important that such 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.

### ***Recommendations***

27. Based on the range of adverse impacts of the proposal and other factors outlined above, Haringey Council's planning committee is urged to refuse this application. It would then be for the applicant to bring forward adequate information and clear proposals that demonstrate that these adverse effects can be overcome and adequately controlled before such a scheme could be considered'. The information currently supplied by the applicant does not do this and is inadequate; a decision taken on this basis would be unsafe when the amenity, environment and health of many nearby residents, as well the wider effects on the character of Crouch End and its employers, are at stake.