

**FERME PARK, CRAWFORD WAY
HORNSEY
REPORT ACCOMPANYING
PLANNING APPLICATION
BY
LONDON CONCRETE LTD**

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SECTION 1: INTRODUCTION

- 1.1 This report supports a planning application submitted on behalf of London Concrete Limited for a rail served concrete batching plant at Ferme Park sidings, Hornsey.
- 1.2 London Concrete Ltd is a division of Aggregate Industries Plc, which was formed in 1997 as a result of a merger between Camas Plc and Bardon Group Plc. London Concrete Limited currently operates seven rail served concrete batching plants in Greater London at Brentford, Purley, Battersea, Greenwich, Wembley, Colnbrook and Bow and a mineral working based plant at Gerrards Cross, Buckinghamshire. A further rail served plant has planning permission at Watford.
- 1.3 The company is committed to supplying its concrete batching plants by sustainable means and in London this means rail importation. That is the basis of this planning application.
- 1.4 The benefit of utilising the railway to import aggregates will result in a significant reduction of HGV movements in this part of London. Currently there are no concrete batching plants in the Borough, so the Haringey market is served by plants which, of necessity, involve HGV movements into the Borough from elsewhere. Thus the proposals will have considerable environmental benefits, and the strategic location of the application site in relation to the principal road network makes it particularly appropriate for the proposed use.
- 1.5 This report is submitted as part of the planning application. Section 2 provides an overview of London Concrete's current and future business proposals. Section 3 goes on to describe details of the proposals, and Section 4 provides a description of the site and surrounding area. The history of the site is considered in Section 5. Central Government and strategic advice in relation to the use of aggregates is dealt with in Section 6 and the relevant adopted and emerging UDP policies are examined in Section 7. Section 8 deals with visual considerations and Section 9 explains the existing pattern of concrete batching plants serving the area.
- 1.6 The planning report is supported by independent assessments from consultants dealing with issues of noise (Cole Jarman), dust (Smith Grant Partnership), ecology (Cresswell Associates); and traffic generation and highway matters (Bellamy Roberts Partnership).

SECTION 2: LONDON CONCRETE'S CURRENT BUSINESS

- 2.1 London Concrete Ltd supplies the building and civil engineering industry with ready mixed concrete. This is essentially a low cost bulk material and the cost of transportation is a significant factor in the delivered price.
- 2.2 Demand for ready mixed concrete will generally be satisfied from whatever sources are available; any insufficiency of adequate suitably sited bulk handling facilities in London and the South East will not stop new development, maintenance and urban infrastructure renewal, but it will make it more expensive and substantially increase traffic movements in and around London.
- 2.3 As a consequence of the low stock life of ready mixed concrete, the market for concrete is a maximum of approximately 4-5 miles from the production plant. This reflects both the cost of transport and also technical issues associated with the product. As a result, the concrete industry is characterised by a network of plants located as close as possible to the market for ready mixed concrete, rather than the source of supply of aggregates. As a consequence, ready mixed concrete companies may supply their plants from aggregate supplies which are considerable distances from their concrete batching plants.
- 2.4 London Concrete wishes to serve the identified market for ready mixed concrete in this part of north London and the proposed site at Ferme Park is an ideal location. The Ferme Park proposal will, by being rail served, improve the sustainability of the ready mixed concrete market in the Borough, to the extent that London Concrete will compete with existing concrete batching plants which are supplied by aggregates imported by road, resulting in fewer HGV movements in the Borough.
- 2.5 The Ferme Park proposal will add to the company's existing network of concrete batching plants and will improve and make more sustainable the supply of ready mixed concrete in this part of London.

SECTION 3: THE APPLICATION PROPOSALS

- 3.1 The application proposes the erection of a low level concrete batching plant, incorporating the latest environmental and safety features. It will be a low level plant as shown on the submitted plans, and will be clad in plastic coated metal sheeting, thereby enclosing all of the working elements of the plant. The reports dealing with noise and dust explain the anticipated impact of the proposals.
- 3.2 Aggregates will be imported by rail. It is estimated that a train carrying approximately 1,350 tonnes will arrive at the site two or three times a week. Cement will arrive in road tankers, although London Concrete anticipate that, in the longer term, cement will, like aggregates, be imported by rail.
- 3.3 Trains will use the existing sidings, arriving from the north. The aggregate will then be transferred into the aggregate storage bins via a bottom unloading system and covered conveyor and then into the concrete batching plant.
- 3.4 The site layout plan shows the various elements of the application proposal. The concrete batching operation is as follows:
- i) Within the concrete batching plant, aggregates are stored in separate storage bins, and cement is stored within a silo. Appropriate quantities of the materials are then weighed and batched by a computer controlled system in the proportions required for the particular mix. Following this, the materials are discharged by gravity into the truck mixers, which then leave the site. The pan mixer that comprises part of the plant allows the ready mixed concrete to enter the mixer trucks in a wet state. Thereafter the rotating drums of the mixer trucks continue to agitate the mix en route to the customer's site.
 - ii) The cement will be discharged directly into the cement silo within the batching plant via a sealed type system, using compressed air. Between one and two deliveries of cement will be needed each day.
 - iii) The plant will probably be served by five mixer trucks, each with a capacity of 8 cubic metres.

iv) The concrete batching plant will be entirely enclosed, including the batch control cabin where the batching manager will supervise the computer control process which measures the required quantities of aggregates, cement and water which, when mixed, comprise ready mixed concrete.

3.5 The dust extraction equipment used as part of the batching operation is detailed in the report prepared by Smith Grant Partnership. The report concludes that the proposal is unlikely to have a discernible affect on the locality.

3.6 All traffic will enter and leave the site by the site entrance onto the two-way eastern limb of Cranford Way, and thence onto Tottenham Lane. The Bellamy Roberts Partnership envisages that there will be an average of 56 vehicle movements per day from the application site. The report concludes that the proposal will have no material impact on either highway capacity or amenity in Cranford Way and Tottenham Lane.

3.7 The concrete batching plant will generate new employment for approximately 12 staff including 5 drivers and 3 plant staff, 2 technical staff and 2 administrative staff at the Company's headquarters.

SECTION 4: DESCRIPTION OF SITE AND SURROUNDING AREA

- 4.1 The application site extends to approximately 1.161 hectares. It comprises operational railway land in the southwest corner of Ferme Park down sidings, which extend along the western side of the East Coast Main Line between Hornsey and Haringey stations. The site is relatively flat and comprises of part of the railway sidings.
- 4.2 Access to the application site is from Cranford Way, which leads onto Tottenham Lane (A103).
- 4.3 To the south, the site is bounded by an embankment, further to the south of which is Chettle Court, a five story block of flats. The nearest residential properties other than Chettle Court, are those located to the west in Uplands Road, Denton Road and to the east of the site beyond the east coast mainline, in Wightman Road. To the north west the application site abuts the Cranford Way Industrial Estate, which largely comprises distribution and storage units.

SECTION 5: SITE HISTORY

- 5.1 The Ferme Park sidings comprise operational railway land in the ownership of Network Rail. Following the privatisation of the railways, the management of freight is now undertaken by English, Welsh and Scottish Railways (EWS).
- 5.2 The application site and the adjoining Cranford Way Industrial Estate, was previously the Hornsey Goods Yard. Following various planning permissions in the 1950's and 60's, office and industrial uses were gradually established on the land, which is now the Cranford Way Industrial Estate. The planning history for the last 30 years largely relates to applications for office uses and for a variety of industrial uses.

SECTION 6: GOVERNMENT AND STRATEGIC ADVICE IN RELATION TO THE USE OF AGGREGATES

6.1 There are a number of documents of relevance to this application.

a) **PPG1 'General Policies and Principles' (1997)**

6.2 The principle of assessing proposals against policies contained in an adopted plan is endorsed in the guidance notes. In relation to this point, paragraph 2 states:

"Section 54A of the 1990 Act requires that, where the development plan contains relevant policies, applications for development which are in accordance with the plan shall be allowed unless material considerations indicate otherwise"

6.3 In this case, the application site is allocated in the adopted UDP as a 'Defined Employment Area'. The application proposals will be in accordance with this allocation.

6.4 PPG1 also endorses the objective of establishing a planning system which is sympathetic to principles of sustainable development.

6.5 The sustainable planning framework is described in paragraph 5 of PPG1 as one which should:

- **Provide for the nation's needs for commercial and industrial development, food production, mineral extraction, new homes and other buildings, while respecting environmental objectives:**
- **use already developed areas in the most efficient way, while making them more attractive places, in which to live and work;**
- **conserve both the cultural heritage and natural resources (including wildlife, landscape, water, soil and air quality) taking particular care to safeguard designations of national and international importance; and**
- **shape new development patterns in a way that minimises the need to travel."**

6.6 Paragraph 7 of PPG1 also encourages regeneration, the re-use of previously developed land, and the location of traffic generating uses in the best locations. The proposals will be directly in accordance with this advice particularly since underutilised urban land in an industrial location will be brought back into beneficial use, with the proposals contributing to the reduction of road traffic, by utilising the rail network.

6.7 A similar theme appears in paragraph 21 with the assessment of sites that are suitable for industry and commerce. Suitable locations are seen as those which take into account:

- “• **the contribution to regenerating existing urban areas;**
- **access to customers;**
- **access to raw materials and suppliers;**
- **links with other businesses and the special needs of small businesses;**
- **the workforce catchment area;**
- **the availability of adequate infrastructure;**
- **various transport considerations including the particular needs of the freight industry.”**

6.8 Clearly, the application site is suitable for batching ready mixed concrete, having regard to the criteria, being in an urban area, accessible to raw materials by rail, and in close proximity to customers.

b) PPG13 Transport (March 2001)

6.9 The overall theme of PPG13 is to promote sustainable transport choices for people and for moving freight; accessibility to jobs, shopping and leisure facilities and services by public transport, walking and cycling; and to reduce the need to travel, especially by the private car.

6.10 In terms of freight, Policy 47 is particularly relevant:-

“Minerals can only be worked where they are found and the transport of minerals and spoil as well as material for landfill sites can have significant environmental impacts. Local authorities should seek to enable the carrying of material by rail or water wherever possible, through partnership with extractors and rail and water operators, appropriate planning conditions and obligations, the use of DETR freight grants and promoting facilities for landing aggregates by sea and distribution by rail or water...”

- 6.11 Paragraph 45 of PPG13 advises that land use planning can help to promote sustainable distribution, including where feasible, the movement of freight by rail. Local authorities are encouraged to identify and, where appropriate, protect sites and routes which could be critical in developing infrastructure for the movement of freight and to encourage developments generating freight movements in the most appropriate locations.

c) **Minerals Policy Guidance**

- 6.12 The most pertinent policy guidance for the provision of aggregates in the South East is MPG6, published in 1994. The Policy objectives of MPG6 are stated in Paragraph 9 as:

“The Government wishes to see indigenous mineral resources developed within its broad objectives of encouraging competition, promoting economic growth, and assisting the creation and maintenance of employment. The Government believes that for the economic well being of the county that the construction industry continues to receive an adequate and steady supply of aggregates so that it can meet the needs of the community and foster economic growth.”

- 6.13 The transportation of aggregates by rail is supported in MPG6. Paragraph 93 of the Guidance Notes states:

“The effect of the heavy goods vehicles used to move aggregates is often a major concern to the local community. Where possible consideration should be given to the movement of material by rail as this can offer environmental advantages and for longer distances may be more economic...”

- 6.14 Further support of rail is given in MPG1, published in July 1996. This states at Paragraph 64 that:

“...the Government would like to see as much freight as possible carried by rail or waterway rather than by road wherever possible.”

d) **Planning for the Supply of Aggregates in England (October 2000)**

- 6.15 This is a DETR document providing guidance for the supply of aggregates.
- 6.16 Annex B provides background information on aggregates and trends in inter regional movements. Paragraph B 16 states that:

“Another major issue for the planning of aggregates supply in England is the tendency for there to be an imbalance between the prime areas of economic activity mainly needing aggregate material, currently especially in London and South East, and the areas where suitable supplies can be obtained. Over time major flows of aggregate material, mainly crushed hard rock, have therefore developed between areas of supply and market areas to ensure a balance between supplying and demand.”

- 6.17 Paragraph 3.21 deals specifically with the transportation of aggregates and identifies that the great majority of aggregate is still distributed by roads. It indicates that if technical and marketing conditions are right, aggregates are very suitable for bulk carriage by rail and water. It is acknowledged, however, that whilst there is a need for rail reception depots within areas of demand, there is competition for the use of such sites from other sectors of industry, and such opportunities may not remain open indefinitely.
- 6.18 The provision of a rail served concrete batching plant at Ferme Park, Hornsey is consistent with this advice.

e) **Regional Planning Guidance**

6.19 The current RPG 3 was published in May 1996. At Paragraph 1.14, the guidance note sets out the key objectives and the strategic framework for London. Among others, these are to:

- **maintain and enhance a competitiveness of business, including encouraging manufacturing, services, tourism, culture and the arts.**
- **encourage a pattern of land use provision and transport which minimises harm to the environment and reduces the need to travel especially by car, consistent with the principles of sustainable development.”**

6.20 At paragraph 1.31, the Guidance states that:

“The land use planning system is a key instrument in ensuring that development is compatible with the aims of sustainable development....”

6.21 The importance of manufacturing to the London economy is identified in the RPG. Paragraph 3.13 states:

“The Government believes that an active and thriving manufacturing sector is vital to the success of London’s economy...”

6.22 The Government’s transport strategy is contained in Chapter 6 and similarly supports the use of less polluting methods of transport (Paragraph 6.2).

6.23 Chapter 9 of the guidance refers to minerals, specifically from paragraph 9.28 through to 9.32. Paragraph 9.28 states that:

“Aggregates are the main minerals to be addressed in UDPs. Local supplies in London are dwindling and there is already a high reliance on imports and stock. Although London supplies less than 10% of its aggregate requirements, local supplies help to ease demand elsewhere and consequential environmental and other costs of transport and distribution. Vision should therefore be made for the extraction of potential workable resources for the foreseeable future. However, as the anticipated increasing demand will exacerbate the supply situation further, it is also important to make provision for imports to London and their transport within London.”

6.24 Paragraph 9.29 states that all UDPs will address minerals issues, whether or not mineral development or activity is taking place or is expected. It goes on to state that:

“Boroughs must be able to demonstrate that they have considered the need and realistic prospects for minerals development, transport, processing and recycling in their area...”

6.25 The guidance notes that there is a presumption in favour of the movement of aggregates (by rail and water) and that Boroughs should address the need to safeguard existing depot, wharf and associated facilities and those with potential and future use. It goes on to state that there is an identified potential need to increase depot and wharf capacity in various parts of London, both to meet local needs for aggregates and to balance distribution patterns for London as a whole. Boroughs should investigate opportunities for such facilities in their areas and identify potential sites. If there is no scope for such development, the UDP must explain why.

6.26 *Importation of aggregates to the application site, will be consistent with these aims in that it involves the production of concrete in a part of London where there is a significant demand, and need for the facility. The existing pattern of concrete batching plants needs to be improved and the proposed site is accessible by rail.*

f) **‘A New Deal for Transport’ (1998)**

6.27 The 1998 White Paper sets out the Government’s approach to transport policy and identified a range of measures which would be instigated in order to achieve the objectives. Paragraph 1.22 of the White Paper sets out the Government’s intention of creating an integrated transport policy. Part of the objectives of that policy are to achieve:

- (i) integration with the environment – so that our transport choices support a better environment; and
- (ii) integration with land use planning – at national, regional and local levels so that transport and planning work together to support more sustainable travel choices and reduce the need to travel.

6.28 Paragraphs 3.32 to 3.35 deal with rail freight. Paragraph 3.32 states that:

“We can move more freight by rail, relieving pressure on the road network and bringing environmental benefits. The main rail freight operator, English, Welsh and Scottish Railway (EWS), has an aspirational target of doubling its traffic measured by tonne-kilometres over 5 years and tripling it over 10.”

6.29 The White Paper identified the Government’s intention to set up a strategic rail authority (SRA) and paragraph 3.33 of the White Paper highlighted the fact that the SRA would be asked to develop targets for both freight and passenger railways in order to secure maximum benefit overall from the rail network.

g) Transport 2010: The Ten Year Plan

6.30 In July 2000 the Government published its 10 year plan for taking forward the goals, set out in the 1998 transport White Paper.

6.31 Paragraph 6.14 of the plan identifies Government funding targets during the period, which include £7 billion rail modernisation fund with the objective of leveraging in private capital to secure the biggest rail expansion programme for more than a century. This rail modernisation fund is said to demonstrate the Government’s commitment to the massive investment programme that is necessary to expand the network, and increase passenger rail freight by 50% and rail freight by 80%.

6.32 Paragraph 6.22 establishes a number of outcomes and targets which the Government expects will be achieved over the period, one of which is:

“A significant increase in rail’s share of the freight market to around 10% - an additional 15 billion tonne kilometres of rail freight, equivalent to one billion lorry trips in 2009/10.”

h) SRA Freight Strategy (May 2001)

6.33 The SRA published its first Freight Strategy in May 2001. The Strategy aims to:

“...set a framework and lay the foundations for a network which will accommodate the scale and type of growth required to deliver the government’s target of 80% growth in 10 years.”

6.34 The strategy identifies that a key role will be played by regional and local planning authorities, particularly in:

“facilitating the provision of a substantial increase in rail-connected warehousing, a significant move towards rail-linked sites for and for industrial activity within land use plans and a higher success rate for rail freight related applications.”

6.35 It is noted within Part 2 of the Strategy, however, that where individual businesses identify a rail connected site, with the specific intention of creating a rail served facility, the evidence suggests that far too many planning applications fail. This is acknowledged as being due to:

“local opposition on environmental grounds (noise and local traffic generation) or as a result of competing demands for the sites in question (e.g. brownfield housing or more employment intensive activities)”

6.36 As a consequence, one of the aims of the Strategy for planning is to:

“improve the understanding of freight requirements by local and regional authorities and thereby ensure that they take into account and plan for rail freight growth and that more applications for planning permission for rail freight interchanges and associated activities are approved.”

i) **The Mayor's Draft Spatial Development Strategy (June 2002)**

6.37 This document was published by the GLA in June 2002 and was followed by a three-month consultation period. Following the responses, the EIP was held in March and April 2003 and the Panel's report was published in July 2003.

6.38 The fifth objective of the Plan is to improve London's transport, with a key policy direction being to:-

"Improve the sustainable movement of freight within and around London, including the use of water and rail."

6.39 This policy direction is taken further in the draft freight strategy (Policy 3C.21):-

"The Mayor will promote the sustainable development of the full range of road, rail and water-borne freight facilities in London..."

6.40 In implementing the strategy, authorities should:

"Ensure that suitable sites and facilities are made available to enable the transfer of freight to rail and water through the protection of existing sites and the provision of new sites."

6.41 The draft plan also states:

"3C.53 The economy of London, and of the wider surrounding region area, relies on an efficient system for the distribution of goods and services. Servicing facilities and the provision of storage, handling and modal transfer facilities to cater for road, rail and water born goods are an important part of the distribution chain.

3C.54 This plan facilitates freight distribution and servicing in a way that minimises congestion and any adverse environmental impact. It aims to foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practical...

3C.55 The Strategic Rail Authority's Freight Strategy suggests that London's growing economy needs three or four large multi-modal freight facilities on the periphery of London together with a number of smaller facilities within the urban area."

6.42 Although the London Plan is still in draft, its aim of seeking to transfer freight from road to rail follows a longstanding ambition of Government for the Boroughs within Greater London.

6.43 This has been recognised by the Panel Inspectors. Paragraph 5.27 of their report refers to paragraph 3C.54 and its encouragement towards a progressive shift of freight from road to more sustainable modes, such as rail. The Inspectors conclude:

"We consider the draft Plan's approach to be entirely consistent with the national policy as set out in PPG13."

6.44 Their recommendation R5.4 is that the Plan should include guidance on the number and location of freight terminals required, and the general locations they will be expected to serve. The application proposals are significant in terms of being in accordance with the emerging strategic policy for enhancing rail transport in London.

SECTION 7: LOCAL DEVELOPMENT PLAN POLICY

7.1 The Statutory Development Plan for the Borough is the Haringey Unitary Development Plan (UDP), which was adopted in March 1998. A review of the plan has commenced with the publication of issue papers in July 2001, and more recently, the first deposit version, in relation to which London Concrete have made representations.

a) **Adopted UDP (1998)**

7.2 Within the Adopted UDP, the majority of the site has no specific allocation. However, part of the site is allocated as a 'Defined Employment Area.' The UDP includes three strategic policies, which seek to:

- i) Protect the existing land and buildings in industrial and commercial use and to encourage investment and the development of a variety of new employment uses in appropriate locations;
- ii) To increase employment opportunities and to improve access to this employment;
- iii) To protect and improve the local environment by ensuring that development of economic activities does not adversely affect the local amenity of transportation network.

7.3 The preamble to the Employment and Economic Activity Chapter at paragraph 1.15 explains that a major feature of the Haringey economy has been a disappearance of large private industries. There has also been a dramatic decline in manufacturing activities since the 1960's. At paragraph 1.16 the Council explain that the main priorities are to retain existing jobs and create new employment opportunities.

7.4 At paragraph 1.18, the Council have defined various types of employment areas of different character where employment generating activity should be located. These are:

- i) Defined employment areas (DEA)
- ii) Mixed areas

iii) Town centres

7.5 At paragraph 1.18 the UDP explains that defined employment areas are areas consisting of entirely of non-residential uses, where the infrastructure exists primarily to serve a range of business classes and related activities. The paragraph further explains that access to and from some DEAs is through residential areas, which, if uncontrolled, creates environmental problems.

7.6 In DEA's, a range of employment generating uses are considered to be acceptable. Policy EMP 1.3 relates to DEA's and states:

"The Council has designated areas as indicated in the Schedule 1 as Defined Employment Areas where the priority will be to sustain a special range of employment generating uses:

- 1. General industrial uses (Use Class B2),**
- 2. Business uses (Use Class B1) but generally excluding proposals for new large scale free standing non-ancillary office floorspace in locations which are not well served to public transport.**
- 3. Warehousing (Use class B8) but only in line with the Policy EMP 1.6 on warehousing."**

7.7 In relation to a new employment opportunities, Policy EMP 2.1 relates to the provision of community benefits.

"... the Council will seek provision of appropriate infrastructure and social, recreational and community facilities where the need for these arises from the development concerned..."

7.8 Other policies in the UDP seek to reduce the number of trips by road. Policy TSP 1.2 states:

"The Council will seek the development of the public transport network to reduce the number of car journeys."

7.9 The explanatory text at Paragraph 5.55 states that the Council recognises the need for road access to commercial and industrial premises, but wishes to minimise the environmental damage which goods vehicles, especially HGVs can cause.

7.10 The Council's aims for freight are:

- i) To site generators of heavy freight advantageously in relation to main roads and railways.
- ii) To provide facilities for the handling of freight to secure efficient distribution.
- iii) To reduce the movement of vehicles on roads, not suitable for them.
- iv) To encourage the use of rail and water to carry freight traffic.

7.11 Policy TSP 6.5 relates to rail freight and states:

“The Council will seek to retain existing rail freight and the provision of additional rail freight facilities, provided that these do not give rise to undue local environmental disturbance.”

7.12 The text of this Policy explains that rail freight is generally less environmentally intrusive than road freight and therefore the Council will generally seek to maintain existing facilities and encourage the development of new ones.

7.13 The embankment to the south of the application site is allocated as an 'Ecologically Valuable Site- Local Importance and the railway lines adjacent to the site are allocated as an 'Ecological Corridor' Policy OP4.1 states:

“ The Council will not permit development on or adjacent to Sites of Special Scientific Interest (SSSI's), Statutory Local Nature Reserves, or other sites of nature conversation 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..”

7.14 In relation to ecological corridors the policy explains that:

“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 so that they do not become fragmented and thereby diminish their ecological value...”

7.15 The text to the policy explains that the Council will expect to see ecological surveys submitted with planning applications. In this case independent consultants, Cresswell Associates, have examined this issue and their report accompanies this application.

7.16 In relation to the ecological corridor, the UDP text explains at paragraph 4.91 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.”

7.17 Policy DES 1 requires new development to be of a good design and that design quality will be assessed in relation to (inter alia):

“...How the proposal relates and fits in with the surrounding area....

Development should relate to site character and its potentiality and should see to improve the quality of the local environment....”

7.18 In making representations to the first deposit draft of the UDP, London Concrete have suggested that the application site should be indicated as land to be safeguarded for rail related uses. We have suggested on London Concrete's behalf that the following form of wording is proposed for this policy:

“The Ferme Park sidings as shown on the Proposals Map will be safeguarded for rail related uses. The Council will resist planning applications for uses which do not utilise the sidings for the transportation of freight by rail.”

- 7.19 London Concrete have also supported Draft Policy M7 which seeks to retain existing rail freight facilities that are still needed for operational purposes and, in dealing with ecologically valuable sites and their corridors, London Concrete have suggested that Paragraph 4.91 of the Adopted Plan is brought forward into the subsequent version, to recognise that the ecological corridors are also operational railway routes where the requirements of transport will need to be taken into account.
- 7.20 London Concrete's proposals for a rail served concrete batching plant in this location would be wholly in line with the adopted and emerging UDP policy. The additional information submitted as part of the application demonstrates that the development proposals will not have any adverse impact on the environment or amenity of the area.

SECTION 8: VISUAL ASSESSMENT OF THE PROPOSAL

- 8.1 London Concrete plants are typically painted a muted grey colour and, as such, in visual terms the plants have little impact upon the amenity of an area.
- 8.2 In this case the application is accompanied by a photomontage, which shows the view of the proposals from the nearest residential area to the south. The location of the photomontage is shown on plan JWR.0928.04/1. The photomontage shows the view from the embankment to the north of the flats at Chettle Court, as access could not be gained into the grounds at the time the photomontage was prepared.
- 8.3 The photomontage shows that the proposed plant is similar in height to the existing railway water and fuel tanks, which are situated adjacent to the site. When viewed from Chettle Court, the proposed plant would not break the skyline and will be seen against a backdrop of existing railway and warehouse developments. In our judgement the plant would form a relatively discrete element and will not have any adverse visual impact.

SECTION 9: PATTERN OF CONCRETE BATCHING PLANTS SERVING THE AREA

9.1 There is a strong demand for ready mixed concrete in the Hornsey/Haringey market, which London Concrete intends to serve from the application site.

9.2 London Concrete's nearest concrete batching plants, at Wembley, Battersea and Bow, are rail served, but operate in substantially different markets, and given that ready mixed concrete cannot be transported for more than 5 miles, these plants are not capable of serving the market in the area. The Ferme Park site is ideally placed to fill the gap between these existing plants.

9.3 In terms of competitors' plants, there are four road fed plants and two rail served plants as follows:

- | | | |
|--|---|-------------|
| • Larfarge, Jeffery's Road, Edmonton, | - | Road Served |
| • RMC, Princes Road, Edmonton, | - | Road Served |
| • Hanson, Stacey Road, off First Avenue, Edmonton, | - | Road Served |
| • RMC, Randells Road, Kings Cross, | - | Road Served |
| • Tarmac, York Road, Kings Cross, | - | Rail Served |
| • Hanson, York Road, Kings Cross. | - | Rail Served |

9.4 None of the Edmonton plants are located on sites which are capable of being linked to the rail network, so to the extent that London Concrete will compete with them, HGV movements in the Haringey area will be reduced. Currently the plants serving the Haringey market and lorries transporting concrete to the area travel a substantial distance to reach customers. The application proposals will clearly have environmental benefits in terms of improving the supply of ready mixed concrete in this part of north London. By increasing market competition, the proposals will generally be delivered during off peak times, and the importation of aggregates by rail will keep traffic associated with the development to a minimum.

SECTION 10: CONCLUSIONS

10.1 The following conclusions can be drawn from the previous sections.

1. London Concrete are committed to producing ready mixed concrete in a sustainable way. The company already operates rail served or mineral based plants and the application proposes a rail served facility which will be environmentally beneficial.
2. There is a need for ready mix concrete in the Hornsey area, which is currently being served by road fed plants from outside of the Borough.
3. The site comprises part of railway sidings and the proposed use is wholly in accordance with the stated aims of the Government and the rail operators in terms of encouraging the movement of freight including minerals by rail, rather than by road.
4. Both the Local Plan and Regional Planning Policies are wholly supportive of the proposals, with part of the site falling in a 'Defined Employment Area' where such uses are acceptable.
5. Other reports submitted in support of the application deal with traffic, noise and dust, and demonstrate that the proposals will have no adverse environmental effects.
6. The type of concrete batching plant proposed together with the environmental safeguards to be incorporated, demonstrates the extent to which London Concrete has embraced modern technology. The proposals cannot be compared with older batching plants, which may operate without the same degree of control proposed by London Concrete.
7. The applicants will accept reasonable and necessary conditions to ensure the implementation of environmental safeguards as part of the application proposals.