

*Contaminated Land
Air Quality
Environmental Audit*



Partnership No: OC 300776

ADG 1

**Town & Country Planning Act 1990
Section 78 Appeal**

**Concrete Batching Plant
at Ferme Park, Hornsey**

Evidence of:

**Alexander David Grant
Smith Grant LLP**

on behalf of:

London Concrete Ltd

Planning Inspectorate Reference: APP/Y5420/A/05/1189822

Local Authority Reference: HGY/2005/0007

R616-R03

November 2005

1 Statement of Experience

- 1.1 My name is Alexander David Grant. I hold a BSc (Hons) in Mining Engineering and an MSc in Marine Environmental Protection. I am a Chartered Engineer, a Member of the Institute of Materials, Minerals and Mining, a Fellow of the Institute of Quarrying and a Registered Environmental Auditor.
- 1.2 I am a founding Member of Smith Grant LLP (SGP). The Partnership, which was established in 1993, is an environmental consultancy specialising in the investigation and remediation of contaminated land, waste management and air quality.
- 1.3 I have carried out numerous air quality assessments of minerals operations and related developments. These include surface coal mining, roadstone coating plants, construction sites and various waste management operations. Of particular relevance to this appeal, I have undertaken several assessments of concrete batching plants, of rail-fed aggregates depots, of a large rail-fed cement depot and of traffic emissions associated with industrial, commercial and residential developments.

2 Scope of Evidence

- 2.1 In my evidence I address the reasons attached to the refusal of permission so far as impact, in terms of dust and air quality, are concerned, including:
- a) a review of the appeal application,
 - b) details of the proposed development,
 - c) dust impact assessment of the concrete batching plant, and
 - d) air quality assessment.
- 2.2 A local residents' group, Green N8, has prepared two Statements of Objections ^{1 2} in respect of the original application and a subsequent parallel application, since revised and now the subject of this appeal. Green N8 raises various concerns about health although these were not specifically identified as a reason for refusal. Nevertheless, to allay any unwarranted fears, Dr A J Ingram, of Ingram Pathology and Toxicology Services, was instructed to provide a separate evaluation of the potential health impacts.

¹ Application No: HGY/2004/1265, Statement of Objections, Green N8, September 2004

² Application No: HGY/2005/0007, Statement of Objections II, Green N8, August 2005

3 Planning Appeal Application

- 3.1 A full review of the planning application and history of the site is provided by Mr Woolner in his evidence and I refer here only to those matters of relevance to dust and air quality impacts.
- 3.2 The original application, Ref HGY/2004/1265, including a dust assessment ³ prepared by myself, was submitted to Haringey Council in January 2004. Additional information was subsequently provided in respect of matters raised by the Council and Green N8 and two public meetings were held in July and September 2004. Following the Council's failure to determine the application, an appeal was lodged in December 2004. In parallel with this, an essentially similar application, Ref HGY/2005/0007, was submitted. Amendments to the parallel application, with an addendum dust assessment ⁴, were then submitted in June 2005. At the Planning Committee on 10 October 2005, permission was refused in respect of the revised parallel application and it was resolved that the original application would also have been refused.
- 3.3 Three reasons for refusal were given and were identical in both cases. Reasons 1 and 2 in part assert that unacceptable or detrimental dust impacts will occur.
- 3.4 Reason 1 states that the additional lorry movements associated with the proposed development "*would result in disturbance to residents in nearby roads, in particular Tottenham Lane and Church Lane, to a degree which would unacceptably detract from the amenity of those residents*".
- 3.5 Reason 2 states that the "*additional traffic to and from the application site, and the nature of that traffic, would by reason of noise and dust generation be detrimental to the current operating and working conditions in Cranford Way, which are predominantly of a storage / light industrial character, rather than general industrial*".

4 Proposed Development

- 4.1 A description of the proposed concrete batching plant was provided with the planning application and is amplified in the evidence presented by Mr Casey and Mr Woolner. The plant will be similar in essential respects to London Concrete's existing plants elsewhere in London and will be designed and operated to minimise the emission of dust at all

³ Report No 616-R01, *Airborne Dust Assessment*, Smith Grant LLP, November 2003

⁴ Report No 616-R02a, *Addendum Airborne Dust Assessment*, Smith Grant LLP, June 2005

stages of the process from the receipt of aggregates and cement to the discharge of the batched concrete into the truck mixers.

4.2 Specific features include:

- a) the predominant use of wet or slurry mixes during the batching process,
- b) enclosure of the truck mixer loading area,
- c) dust extraction from the loading area,
- d) transfer of all aggregates by enclosed conveyors,
- e) full enclosure of the aggregates bins and cement silos within the plant,
- f) visible / audible alarms on the silos to prevent overfilling,
- g) reverse jet filters fitted to the vents of the silos, and
- h) automatic closure of the cement inlet line if the pressure relief valve on a silo operates.

4.3 These are standard features at the company's batching plants and have contributed to a record of no substantiated complaints in respect of dust over a period of several years.

4.4 It is proposed to deliver aggregates by rail via an enclosed bottom discharge unit (BDU) into a ground level hopper, from where they will be transferred by an enclosed conveyor into fully clad storage bins. The aggregates will then be transferred as required by a second enclosed conveyor into the plant. The purpose of the BDU and storage bins is the supply of aggregates for the batching process and it is not proposed to distribute aggregates from the site for other uses.

4.5 Notwithstanding the positive features of the original scheme, amendments to the proposed batching plant were drawn up, as shown on Martin O'Brien's Drg Nos 2416/10 Rev D and 2416/20 Rev C, in response to points raised at various meetings with the Council. These include:

- a) plant rotated anti-clockwise, with the loading bay now facing northeast, away from Chettle Court, towards the railway tracks,
- b) a 5m high acoustic screen along the southeast side of the loading bay, and
- c) full enclosure of the conveyor discharge into the plant.

4.6 Additionally, amendments to the storage bins include:

- a) additional cladding at the base of the bins to provide full enclosure of the discharge chutes and bottom conveyor, and
- b) full enclosure at roof level of the conveyor discharge into the bins.

- 4.7 The proposed arrangements represent a progressive development in London Concrete's rail-fed operations.

5 Dust Impact Assessment

5.1 Original Assessment

5.1.1 In the dust assessment which was submitted with the original planning application, it was identified that:

- a) The site setting is urban, with industrial land on Cranford Way to the north, housing at Chettle Court to the south and Uplands Road to the west, a main railway line to the east and, beyond that, further housing at Wightman Road. There is little effective screening from the effects of dust between the site and the closest potentially sensitive receptors.
- b) The annual wind rose for Heathrow, which the Met Office advises is the most appropriate weather station for the locality, shows that the prevailing winds blow from south, southwest and west for a total of 54% of the time annually.
- c) Typical dust deposition rates ⁵ range from 30 to 80 mg/m²/day in suburban areas and from 80 to 160 mg/m²/day in town centre or industrial areas (Appendix 1). The site setting, with busy urban roads, the industrial estate and loose potentially dusty deposits throughout, suggests that the dust deposition rates are likely to lie towards the upper end of the typical range for suburban areas and the lower end of the typical range for industrial areas, ie, about 80 mg/m²/day.
- d) Mapped air quality data do not indicate any requirement to declare an Air Quality Management Area (AQMA) in the area. However, on the basis of nitrogen dioxide concentrations measured at a roadside location about 3.5km to the northeast of the application site, Haringey Council has declared a borough-wide AQMA. The Council has produced an Air Quality Action Plan which includes proposals for the promotion of a Low Emission Zone for London and improved enforcement of Part B industrial processes.

⁵ *Environmental Effects of Surface Mineral Workings*, HMSO, 1991

- e) On the basis of the likely dust regime in the area, the potential onset of nuisance may occur when dust deposition exceeds 200 mg/m²/day. Modern planning conditions typically include a requirement to submit a scheme of measures for the suppression of dust from processes such as concrete batching. Concrete batching processes are subject to pollution controls, under which operating and management procedures are specified in accordance with the published guidance.
- f) On the basis of dust monitoring carried out previously at an older batching plant operated by another company, and observations made of London Concrete's plant at Pensbury Place, Battersea, the operation of the proposed plant at Hornsey is unlikely to cause a significant impact on dust levels in the vicinity of the site. This is consistent with advice ⁶, to the effect that batching plants have *LOW emission potential (with mitigation)* (Appendix 2), and with London Concrete's operating experience at its existing plants which have been in operation for several years without giving rise to any substantiated complaints about dust.
- g) The impact in Tottenham Lane of exhaust emissions from vehicles associated with the proposed plant was assessed using the DMRB screening model ⁷. The modelling shows that vehicles serving the plant will not have a significant impact on local air quality. London Concrete uses a modern fleet of truck mixers, most of which already comply with Euro III emission standards, thus according with any Low Emission Zone which may be promoted in due course. The supply by rail of aggregates to the plant will make a positive contribution to the air quality action plans being developed throughout London.
- h) It is London Concrete's policy to minimise the impact of its operations. Standard good practices, complying with the Best Available Techniques detailed in the guidance, will be adopted by the company at the proposed plant. The Plant Manager will be required to undertake daily inspections with specific reference to dust control and to take any necessary action to prevent visible emissions beyond the site boundaries or from the cement silos. Strict adherence will be made to any scheme of measures which may

⁶ Best Practice Guide, appended to *The Environmental Effects of Dust from Surface Mineral Workings*, HMSO, 1995

⁷ *Design Manual for Roads and Bridges*, Version 1.02, Highways Agency, 2003

be agreed with the Council and to the conditions attached to the pollution control permit for the process.

5.1.2 It was concluded that it is unlikely that the operation of the proposed concrete batching plant at Hornsey will cause any adverse impacts due to airborne dust or air quality at any potentially sensitive receptor in the vicinity of the site.

5.2 Revised Assessment

5.2.1 I subsequently carried out a review of the assessment in the context of an interim revised layout, comments made by Green N8 and updated guidance. The principal matters concerned:

- a) the shelter provided to the loading bay from the prevailing winds,
- b) the children's play area and "green corridor",
- c) updated air quality data and standards,
- d) Local Air Pollution Prevention and Control (LAPPC) and the updated guidance in PGN 3/1 (04)⁸ (Appendix 3), and
- e) revised DMRB modelling for the years 2006 and 2010.

5.2.2 PGN 3/1 (04) places requirements on operators in respect of emissions and control measures, compliance with which is regulated under LAPPC by Local Authorities. Specific requirements are:

- a) no visible emission across the site boundary,
- b) no visible emission from silo inlets and outlets,
- c) new silo filtration plant to meet an emission standard of 10 mg/m³ or less,
- d) new silos to be fitted with automatic protection systems, and
- e) tankers to be fitted with on-board relief valves and filtration equipment by June 2007.

5.2.3 With regard to a scheme of measures for the suppression of dust, PGN 3/1 (04) also notes the desirability of a structured approach to environmental management.

5.2.4 The review confirmed the overall substance of the original assessment and did not affect the conclusions.

⁸ Process Guidance Note 3/1 (04), *Secretary of State's Guidance for Blending, Packing, Loading, Unloading and Use of Bulk Cement*, DEFRA, 2004

5.3 Addendum Assessment

5.3.1 In the addendum assessment, it was identified that, although the original scheme was unlikely to cause an adverse impact due to airborne dust, the proposed amendments to the batching plant would confer some additional benefits, namely:

- a) the re-orientation of the plant will provide enhanced shelter to the loading bay from the prevailing winds, thus providing additional containment to any dust which might otherwise be released,
- b) further shelter and containment to the loading bay will be provided by the acoustic screen, and
- c) the full enclosure of the conveyor discharge into the top of the plant will reduce the already low risk of dust emissions from the conveyor to near zero.

5.3.2 Additionally, the proposed amendments to the storage bins will reduce the already low risk of dust emissions from the bins to near zero.

5.4 Regulator Comments

5.4.1 Following submission of the application to Haringey Council, Mr Fred Robotham, Scientific Officer - Enforcement, was consulted by the Planning Officer in respect of the accompanying dust assessment. During a subsequent verbal contact with Mr Robotham, he advised me that he had "*no problems with air pollution*" from the proposed plant. In a later e-mail, Mr Robotham further advised me that he had no comments on the addendum report. He commented that, if the application were to be approved, a condition requiring assurance that appropriate measures are taken during the construction phase to limit impact and to use the draft London Code of Practice, Part 1, *The Control of Dust from Construction*, would be likely. I am advised by London Concrete that the company will comply with this requirement.

5.5 Tolworth Appeal

5.5.1 At a recent appeal ⁹ into London Concrete's proposal for a similar batching plant and associated rail-fed aggregates depot at Tolworth, I presented evidence on dust and air quality. In contrast with the current application, a potentially dustier operation was proposed at Tolworth, namely the unloading of aggregates by grab

⁹ Appeal Ref: APP/Z5630/A/03/1136175, Tolworth Station Road, Kingston Road, Tolworth, Surrey, October 2004

from rail trucks and their stockpiling in open bays. The aggregates would be transferred as necessary by wheeled loader into a ground level hopper at the batching plant. The operation of the aggregates depot would be subject to the provisions of a dust management scheme which was presented at the Inquiry.

- 5.5.2 The site setting at Tolworth is potentially more sensitive than at Ferme Park because disused Government Offices, which are allocated for housing in the review UDP, are located only 60m from, and at a lower elevation than, the proposed aggregates depot.
- 5.5.3 The Inspector accepted, at paragraph 24 of his decision letter (Appendix 1), that *"there would be no loss of amenity for occupiers of nearby dwellings as a result of dust from the batching plant"*. He was also satisfied, at paragraph 26, that despite the non-enclosed nature of the aggregates depot, loss of amenity due to dust from the depot *"would be unlikely to occur if undertaken in accordance with the provisions of the dust management scheme"*.
- 5.5.4 In contrast with Tolworth, the proposed operations at Ferme Park will be inherently less dusty with the use of a bottom discharge unit and the full enclosure of the aggregates handling and storage facilities. There will be no aggregates unloading by grab or their transfer by wheeled loader. Finally, at a distance of 100m, the nearest residents at Ferme Park will be significantly further from the main operations, and upwind from the site in the prevailing wind direction.

6 Reasons for Refusal

6.1 Committee Report

- 6.1.1 In the Committee Report for the revised parallel application, the Environmental Health Officer (EHO) made the following response in respect of air pollution:

"Air pollution - an application for a permit under LAPPC has already been submitted that includes details of Best Available Techniques to be implemented in the site management and, if the scheme goes ahead, it would be regularly inspected and monitored to ensure satisfactory operation. This regulatory regime, together with the revisions to the design of the plant, should ensure that there will be no significant dust emissions (my emphasis). The applicants have already been informed that should the scheme go ahead, a Construction Management Plan would be prepared to show how dust would be minimised during construction, in

line with the draft London Code of Practice, Part 1: The Control of Dust from Construction."

6.1.2 It is apparent therefore, as per Mr Robotham's earlier responses to me, that the EHO was satisfied that there would be adequate controls to ensure that dust would not cause adverse impacts in the locality. Specifically, in connection with the first and second reasons for refusal, the Officer made no comment in respect of the potential impact of dust associated with vehicles travelling to and from the proposed plant.

6.1.3 Given the nature of the proposed development, and the comprehensive dust control measures which are proposed, I was very surprised to see that, notwithstanding the Committee Report, this impact was included in the reasons for refusal.

6.1.4 In assessing the potential impacts of the proposed batching plant, the Council instructed Casella Stanger to carry out a peer review of the dust assessment which was submitted with the original application. Casella identified various differences in approach, but they did not dissent from the overall findings and concluded:

"When taking a holistic view of the dust assessment report and the points mentioned above, our professional judgement is that the impacts of the London Concrete plant will be negligible (my emphasis)."

6.1.5 The Committee Report included a summary of Casella's work. Importantly, the above conclusion was ignored in the summary, whilst a comment about there remaining "*concerns about dust raised from roads, especially Cranford Way, by these additional HGVs*" was inserted at the end of the summary. Nowhere in the preceding text is there any indication that this was the professional view of either the EHO or of Casella.

6.1.6 In a subsequent section, entitled "*Employment matters*", the Committee Report records:

"Although fears of dust emissions from the process may be exaggerated, there is a distinct possibility of spillage from mixer trucks, especially at the southern end of Cranford Way, and the development will cause a significant increase in the number of HGVs using this road. This will undoubtedly give rise to greater disturbance of dust deposited on the road, and for some existing or potential occupiers this element will be crucial."

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- 6.1.7 In a further section, "*Local environment and quality of life*", concerns are raised "*about the impact of exhaust fumes from the additional lorries on residents of nearby streets, especially Tottenham Lane which is uphill*".
- 6.1.8 Again, there was no indication in the preceding text that either of these matters represented the professional views of the EHO or Casella.
- 6.1.9 These matters effectively constitute parts of the first and second reasons for refusal and are discussed in more detail below.

6.2 Reason 1

6.2.1 Two potential sources of dust can be identified, namely:

- a) additional HGVs stirring up existing dust, and
- b) the creation of new dust.

6.2.2 Dealing with the first source, this is not in my view a plausible assertion. However, for completeness, I have essayed an approach to demonstrate how implausible the contention is. From my experience of monitoring airborne particulate levels at various minerals sites and associated operations, total suspended dust levels (TSP) tend in general to be about 50% higher than PM10 levels. The DMRB modelling of the additional HGV movements, which was carried out during the original dust assessment, indicates that the increase in PM10 levels will be about 0.3% over the baseline condition, ie, it will not be discernible in absolute terms nor in the context of normal environmental variation. A proportionate increase in TSP levels associated with the stirring up of existing dust will therefore be equally unlikely to have a discernible impact.

6.2.3 With regard to the creation of new dust, the principal alleged source appears to be material falling from the truck mixers. The capacity of the mixer drums, combined with the scrolling action of the drum which keeps the concrete at the lower end away from the discharge chute, ensures that there is sufficient freeboard to avoid spillages, even when the vehicles are travelling uphill. The vehicles themselves, as takes place with London Concrete's current fleet, will be hosed down on each visit to the batching plant, as part of the dust control measures for the site. This will ensure that there are no materials adhering to the wheels or chassis which might be deposited on the public highway and subsequently be entrained into the atmosphere by other traffic. The effectiveness of this measure can be readily seen

from the clean condition of London Concrete's existing vehicles as they travel through London.

6.2.4 Additionally, the impact of exhaust fumes on the uphill section of Tottenham Lane is cited in the Committee Report. It is true of course that loaded vehicles travelling uphill will emit more exhaust gases. However, depending on the location of the customers, only a proportion of the journeys will be on the uphill section of Tottenham Lane, beyond the one-way system. The potential impact will be partially balanced by the returning vehicles travelling downhill under little or no engine load. The DMRB modelling which has been carried out indicates that there will be no significant impact on local air quality and the above factors do not materially change this conclusion.

6.2.5 I do not agree therefore that the passage of HGVs to and from the application site will detract unacceptably from the amenity of local residents.

6.3 Reason 2

6.3.1 Broadly similar considerations apply in respect of the potential impacts on businesses on Cranford Way.

6.3.2 During various site visits, I have observed loose potentially dusty deposits on Cranford Way and these can be entrained into the atmosphere by the passage of vehicles, including those travelling to and from the application site.

6.3.3 Mr Bellamy states in his evidence that, were the application site to be developed as a distribution depot, this would generate on average 38 HGV movements per day. As can be seen from Mr Bellamy's evidence, the estimated HGV movements associated with the batching plant are low when compared with the existing and recent historical HGV movements on Cranford Way. Taking into account the accepted allocation for the application site, the vehicle movements associated with the batching plant are unlikely to have a significant additional impact on dust levels on Cranford Way. Even on an absolute basis, considering only London Concrete's vehicles, there will be no cause for concern.

6.3.4 Nevertheless, London Concrete has indicated that, as a responsible business and to avoid unwarranted fears, the company will wet sweep Cranford Way in conjunction with the twice-weekly sweeping of the application site. This will actually give a positive benefit in terms of reduced dust levels along Cranford Way.

6.3.5 With regard to the creation of new dust, the enclosure of the proposed operations will result in almost complete containment of any dust emissions. Additionally, the yard will be wet swept at regular intervals to ensure that there is no accumulation of loose deposits and to minimise track-out onto Cranford Way. As noted above, the loaded vehicles will be hosed down and the batched concrete does not itself constitute a dust source. The operation of the proposed batching plant is unlikely therefore to result in significant quantities of new dust along Cranford Way.

6.3.6 I do not agree therefore that the passage of HGVs to and from the application site will be detrimental to the current operating and working conditions at properties on Cranford Way.

6.4 Conclusion

6.4.1 I do not consider that, in refusing planning permission, either of Reasons 1 and 2 is justified in terms of dust and air quality impacts. This conclusion is consistent with the EHO's advice to myself and with the consultation response on air pollution in the Committee Report. It accords also with Casella's professional judgement "*that the impacts of the London Concrete plant will be negligible*".

7 **Health Impacts**

7.1 In response to the concerns raised by Green N8 and other third parties, although these were not included in the reasons for refusal, Dr Ingram has provided an evaluation of the health issues associated with the proposed batching plant ¹⁰ (Appendix 4).

7.2 Dr Ingram has identified the health effects associated with the various materials which will be handled during the concrete batching process, namely:

- a) cement,
- b) pulverised fuel ash,
- c) natural aggregates.

7.3 Dr Ingram assesses that adverse health impacts are not likely to arise from dust associated with the materials used in the concrete batching process. He makes specific

¹⁰ *Ferme Park, Hornsey, Proposed Concrete Plant, Evaluation of Health Issues*. Dr A J Ingram, October 2005

reference to concerns about asthma and notes that "*mineral particles are not allergenic and would therefore not be expected to give rise to asthma*".

- 7.4 These findings, which accord with my personal understanding of the risks associated with concrete batching, indicate that adverse health impacts are unlikely to be experienced by local residents.

8 Planning and Pollution Controls

8.1 Planning Controls

8.1.1 Planning permissions for industrial developments are conditioned to prevent or control environmental impacts. In the case of concrete batching plants, modern permissions invariably include conditions relating to the control of dust and air quality and may include a requirement to submit for approval a scheme of control measures.

8.1.2 It is noted in current guidance ¹¹ (Appendix 5) that it is inappropriate to set definitive standards for dust. However, appropriate planning conditions will enable the Council to regulate the proposed activities and ensure that adverse impacts are not caused in the locality.

8.2 Pollution Control

8.2.1 As I have already noted, the concrete batching process will be regulated by the Council under LAPPC. Any permit which may be issued by the Council will be based on PGN 3/1 (04), and will specify emission limit values for the process. The primary objective of the permit will be to control the release of dust at all stages from the receipt of raw materials to their use in the batching process. Permits also include more general dust controls based on standard good practices and house-keeping, and specify any monitoring which is to be carried out.

8.2.2 Permits issued under LAPPC are subject to periodic review, routinely every six years. Specifically, permits may be revised if:

¹¹ *The Environmental Effects of Dust from Surface Mineral Workings*, HMSO, 1995

- a) the pollution from the installation is of such significance that the existing emission limit values need to be revised or new emission limit values need to be included,
- b) substantial changes in BAT make it possible to reduce significantly emissions from the installation without imposing excessive costs, or
- c) operational safety of the activities carried out in the installation requires other techniques to be used.

8.2.3 Permit conditions should also be reviewed where complaint is attributable to the process and is, in the opinion of the regulator, justified.

8.2.4 London Concrete has submitted an application for a LAPPC permit for the proposed batching plant at Ferme Park. The application includes:

- a) description of the process,
- b) dust management procedures,
- c) health and safety data sheets,
- d) environmental policy,
- e) monthly check lists and report sheets,
- f) maintenance logs,
- g) daily logs, and
- h) emergency response procedures.

8.2.5 I understand that the application, which is similar in scope to the applications made by London Concrete for the company's other plants, will not be assessed by the Council until the planning process, including this appeal, has been completed.

8.3 Section 106 Unilateral Undertaking

8.3.1 Notwithstanding the application for a LAPPC permit, a separate S106 unilateral undertaking is being prepared on behalf of London Concrete to secure for the Council controls for, amongst other matters, dust management at the application site. I have therefore drawn up a dust management scheme (Appendix 6) which will be annexed to the S106 undertaking.

8.3.2 I confirm that the scheme accords with the relevant parts of current best practice for minerals extraction ¹² (Appendix 7). Adherence to the provisions of the scheme

¹² Minerals Policy Statement 2, Appendix 1B, *Methods for Reducing and Controlling Dust*, ODPM, 2005

will ensure that adverse impacts due to dust are not caused at any stage of the proposed operations from the unloading of aggregates to the batching and distribution of concrete.

8.4 Environmental Management

8.4.1 It is the corporate policy of London Concrete to minimise the impacts of its operations on the environment, as is evidenced by the construction and operation of the company's existing plants elsewhere around London. Specifically, site staff are required to take any necessary action to prevent environmental harm, including visible dust emissions.

8.4.2 This approach, coupled with effective planning and pollution controls as described above, will ensure that emissions from the proposed concrete batching plant do not cause any adverse impacts in the vicinity of the site.

8.4.3 This is consistent with current guidance to the effect that batching plants have "*LOW emission potential (with mitigation)*".

9 **Conclusions**

- 9.1 I have examined the potential impact of the proposed concrete batching plant, and of the associated bottom discharge unit and aggregates storage bins.
- 9.2 I have noted the reasons for refusal which, in terms of dust and air quality, relate to the impacts of HGVs travelling to and from the proposed plant on local residential areas and businesses on Cranford Way.
- 9.3 Dust and air quality assessments were submitted with the planning applications for the proposed plant. These concluded that the operation of the plant, which will be governed by a LAPPC permit, is unlikely to have any harmful impact in the vicinity of the site.
- 9.4 Exhaust emissions and releases of fine particulates will not result in adverse air quality impacts.
- 9.5 These conclusions are consistent with the views of the EHO who appears to be satisfied that the regulatory regime will ensure that dust will not cause adverse impacts in the locality. They accord also with the professional judgement of Casella Stanger, namely, "*the impacts of the London Concrete plant will be negligible*".