

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

APPLICATION NO. HGY/2005/0007

STATEMENT OF OBJECTIONS II

BY GREEN N8 COMMUNITY GROUP
www.GreenN8.org

17 AUGUST 2005



CONTENTS

1.0 INTRODUCTION 1

2.0 THE APPLICATION SITE 2

3.0 TRANSPORT ISSUES 3

4.0 NOISE ISSUES 10

5.0 ECONOMIC ISSUES 11

6.0 ECOLOGY ISSUES 14

7.0 AIR QUALITY, AIRBORNE DUST & HEALTH IMPACTS 22

8.0 PLANNING CONDITIONS & OBLIGATIONS 26

9.0 OVERALL CONCLUSIONS 27

APPENDICES

Appendix 1: Information on Particulates 29

Appendix 2: Green N8 List of Requested Surveys and Tests 30

Appendix 3: Details of Bat Species Adjoining the Site [INFORMATION AWAITED] 39

1.0 INTRODUCTION

- 1.1 This document sets out objections, by a Hornsey residents group, to the second planning application by London Concrete for a concrete batching plant at the Cranford Way Industrial Estate in Hornsey.
- 1.2 This document should be read in conjunction with 'The Statement of Objections' (September 2004) by the same residents group which was submitted in response to the first application by London Concrete for a concrete batching plant at the same location.
- 1.3 This new report coupled with that of September 2004 identify and assess the key potential impacts of this and previous proposals 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 have also been highlighted.
- 1.4 This objection document is set out as follows:
- Section 2 describes the characteristics of the site and its surroundings;
 - Section 3 examines transportation issues and likely traffic impacts;
 - Section 4 considers impacts on noise;
 - Section 5 considers the economic impact;
 - Section 6 considers impacts on ecology and nature conservation;
 - Section 7 assesses the likely impacts on air quality, airborne dust and health;
 - 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.
- 1.5 The contents list of this latest report is similar to that produced in the September 2004 document. However, it must be emphasised that this is an addendum to the earlier report and therefore the September 2004 document is reproduced and re-submitted.
- 1.6 In addition to the similar sections above the September 2004 document also included information on London Concrete's activities elsewhere in the U.K. This section has not been updated but remains equally relevant when considering reports and undertakings submitted by London Concrete.
- 1.7 Similarly the conflicts with Planning Policy listed in Section 8.0 of the September 2004 document remain as relevant today as then and have not been reproduced.

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 some 100 metres to the north. An area of open green space of nature conservation importance lies to the 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 only 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, just 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.

3.0 TRANSPORT

Introduction

- 3.1 The transport assessments carried out by Bellamy Roberts, on behalf of London Concrete fall short in a number of areas. The original report (April 2003) and the summary version produced in July 2005 both take a very narrow view of the transport implications posed by the development, concentrating on only two aspects - volume and capacity of traffic, and the alignment, from London Concrete's point of view, of the proposal with Government road to rail policy for freight.
- 3.2 The revised layout proposals submitted by London Concrete do not have any impact on transport issues, as admitted by Bellamy Roberts in its July 2005 summary (para 6.1, page 5). Nevertheless we take this opportunity to restate our objections in this critical area, and to emphasise in particular aspects which are not addressed by either of London Concrete's applications.
- 3.3 There are seven areas for consideration, as follows:
- LC's consultants' flawed case for a batching plant to be sited in Cranford Way
 - LC's consultants' inadequate assessment of the gyratory system around Cranford Way
 - LC's consultants' flawed methodology in their assessment of traffic volumes and capacity
 - LC's consultants' failure to assess the impact of private contractors collecting supplies
 - Impact on local roads, air quality and noise levels
 - Detrimental effect on non-car means of transport and public transport
 - Conflict with policy initiatives supported by Haringey Council.

London Concrete's flawed case for a batching plant at Cranford Way

- 3.4 London Concrete has not made any case for the need of a readymix cement plant in Haringey. The Borough's needs are, and can be, supplied from existing plants, situated within a 3 – 4 mile radius.
- 3.5 London Concrete's assertion that the establishment of a concrete batching plant in Cranford Way would reduce HGV traffic in Haringey, and in this area of London, is fallacious. In fact, the reverse is true. At present there is virtually no movement of concrete in Haringey on a daily basis, and no movement at all of aggregate related to the production of concrete.
- 3.6 London Concrete's proposal will, based on Firstplan's estimates, result in a significant daily movement of at least 58 HGVs for London Concrete's own 5 vehicles. These road movements will be concentrated at the node in Hornsey before spreading out through Haringey and the neighbouring areas. As they expect to sell ready mix to customers who collect, that Heavy Goods Vehicle rate could be doubled (see paragraph 3.18 below).
- 3.7 Contrary to their consultants' (Bellamy Roberts) calculations there will be a very significant increase in HGV traffic along Cranford Way (up by 85%) and a not insignificant increase along Tottenham Lane (up by 17%).

- 3.8 In their conclusions BR (paragraph 7.1 in both 2003 & 2005 reports) emphasize that bringing aggregate supplies by rail will have a:

“significant benefit for the wider London area and for the borough itself in PPG13 terms because almost all of the competing plants for this market are entirely road-fed including incoming aggregate supplies. All concrete supplied from the proposed new plant will therefore reduce the amount of lorry movement in this part of London...”

- 3.9 As London Concrete’s competitors in Edmonton receive aggregates from the north and as two of those at King’s Cross receive their supply by rail and the third by river and a short road transfer, **there is no substance to London Concrete’s claim**, as there is no need for movements of aggregate through Haringey.

London Concrete’s consultants’ inadequate assessment of the gyratory system around Cranford Way, in particular Church Lane

- 3.10 BR’s assessment of traffic capacity is restricted to Cranford Way and the Tottenham Lane / Cranford Way junction. It takes no account of the traffic volume on Church Lane / Tottenham Lane as it proceeds into Crouch End, and the Church Lane / Hornsey High Street junction. It is likely that the traffic density will be much greater along Church Lane, as it is narrower and more residential than Tottenham Lane / Cranford Way. The restricted space and 90 degree bend for vehicles turning right into Church Lane has not been discussed. Nor is there any mention of the extreme road narrowing of Tottenham Lane as it proceeds into Crouch End, occurring just before the Church Lane junction.
- 3.11 Most or many of the counterpart journeys of the lorries would have to be made along Church Lane, as well as Tottenham Lane further south at the point at which the two road systems diverge (a very narrow stretch of two-way road already under pressure through normal traffic movements), and the turning into Tottenham Lane from Turnpike Lane / Priory Road which has recently been reconstructed.
- 3.12 In their conclusion (para 7.2, July 2005 summary), BR refer to the ‘*detailed analysis of the potential traffic generation and its impact on the adjacent highway network*’, notwithstanding that they ignored the counterpart road in the one way system and the impact on other roads and junctions in the immediate area, and chose a 12-hour time frame, thus masking the actual impact of journeys made. Its claims that its assessment ‘*shows that it [the proposal] will have no material impact on either highway capacity*’ – although the actual levels of planned production show that it clearly does – ‘*or on amenity for residents living alongside adjacent parts of the road network*’, simply do not hold true. By choosing to concentrate on the junction of Cranford Way and Tottenham Lane only, the number of residents that will be affected can be ignored, as there are none. It is only when a more wide-ranging survey is properly conducted, taking into account the impact on the actual road network affected – and beyond the narrow area chosen for the original surveys – that the true impact can be demonstrated. **BR’s survey cannot be said to be an accurate assessment of the impact that traffic movements generated will have on the locality.**

London Concrete's consultants' flawed methodology in their assessment of traffic volumes and capacity

- 3.13 BR's Transport Assessment (paragraph 4.1, page 9, 2003 report) has a base line from 7am to 7pm. Most building operations take place during a working day dictated by the needs of the building industry – it is unlikely that any London Concrete traffic movements would be generated after 4pm, however by extending the period of time chosen for the traffic survey it is possible to distort the impact by including statistics relating to journeys made outside of the likely window of operation. Paragraph 5.8 in BR's July 2005 report refers to a request from Haringey's Transport Officer concerning the capacity of the junction of Cranford Way and Tottenham Lane. This was carried out on the basis of the data described above [baseline survey] using PICADY (a statistical modelling tool used to predict potential movements at junctions). **However their survey conclusions are clearly flawed by:**
- a) including two peak traffic flow periods, morning and evening, where in actuality only the morning one would be likely to be affected,
 - b) not considering the impact of private contractors' vehicles.
- 3.14 BR's measurement of traffic volumes are further misleading in they do not compare traffic flows of vehicles on a like-for-like basis, masking the true impact of the increase in HGV vehicles. The low increases given in their report are only arrived at by comparing heavy vehicles with very much lighter vehicles such as cars, small vans and 2-axle vehicles. BR's methodology in these surveys is entirely quantitative; they pay no heed to the qualitative aspects of such traffic flows and the possible consequences of a significant increase in the volume of HGV traffic.
- 3.15 Our earlier report gave detailed like-for-like figures for HGV movements for each of the road sections surveyed by Bellamy Roberts, with supporting evidence (see paragraphs 3.19 – 3.29, pp. 14 – 15). For this submission it is sufficient to give the headline figures for the roads surveyed:
- an 84.8% increase in total movements of HGVs (3-axles and above) into and out of Cranford Way (as opposed to a 7.6% increase in total movements of all traffic stated by BR)
 - a 155.5% increase of 3-axles and above, or 38% increase of 2-axles and above, on the southern part of Cranford Way
 - a 17.2% increase in HGV movements along Tottenham Lane (as opposed to a 5.6% increase calculated by BR)
- 3.16 Private contractors collecting their own supplies direct from Cranford Way are not taken into account in BR's report. They will cause additional increases in the volume of HGV traffic. Using a conservative estimate of 25 contractors per day (figures from an observation of London Concrete's Wembley plant), there would be an increase of 16% in MGW / HGV activity alone along Tottenham Lane. That figure is in excess of the 10% threshold required to trigger consideration of whether or not further investigation is required.

LC's consultants' failure to consider the impact of private contractors collecting Supplies

- 3.17 London Concrete admits that there will be facility for contractors to collect their concrete direct, but no attempt has been made to look at what impact this additional HGV traffic will have on the area, in terms of traffic density and efficiency of collection, spillage rates, soiling of roads etc. If an average 25 loads of ready-mix are collected by contractors each day, then there will be an additional 50 HGV movements a day. If private contractors are supplied then London Concrete will need to send in extra cement, resulting in further HGV movements each day.
- 3.18 Delivery by London Concrete, and collection by private contractors, is most likely to be concentrated between 8am and 4pm. London Concrete's own vehicles will, on average, result in 7 movements each hour; add in the contractors' HGVs and this will increase the movement into and out of Cranford Way from Tottenham Lane to nearly 14 movements per hour. **This amounts to one movement of a concrete HGV every four minutes.** The average movement, (for the same 8 hour period) of all types of HGVs along this section of the one-way system, according to BR's survey on 13 March 2003, was 16. **London Concrete's presence at Cranford Way will effectively double the amount of HGV traffic movements per hour!** The vehicles carrying concrete and the daily cement supplies will all be at the top of the HGV range and all carrying significant loads.
- 3.19 The volume of London Concrete-generated traffic reaching the levels described above is supported by statements concerning the volume of aggregates (which presumably includes the sand required) that it is proposed should be delivered by rail. **First Plan** (Para 3.2) in their main proposal in support of London Concrete, talks of 2-3 trainloads of 1350 tons each arriving every week (cement powder will be delivered by road). Over an assumed 48-week working year between 130,000 – 194,000 tons of aggregate and sand will be delivered.
- 3.20 Most concrete is a mixture of cement powder (16%), sand (42%) and gravel (42%) to which is added water.
- The typical 18-ton load of ready-mix, carried by LC's own HGVs, would therefore contain 15 tons of aggregate.
 - 5 loads per day X 5 days X 48 weeks = 6000 loads X 15 tons = 108,000 tons of aggregate/sand used and transported by London Concrete.
 - Between 22,000 – 86,000 tons will be available for producing ready mix for their private buyers to collect. Theoretically enough for up to 8,600 loads a year, in 12-ton capacity private vehicles.

London Concrete are clearly catering for a significant volume of sales to buyers arranging their own collection but they, and their 'independent' consultants, have deliberately chosen to avoid acknowledging this in their various reports.

Impacts on local roads, air quality and noise levels.

- 3.21 BR's assessment, and those carried out by London Concrete's other consultants, chose to ignore the effects of the HGVs involved on highways wear and tear, the environment of the local area and on the thousands of adults and children living and/or working in this highly residential area.
- 3.22 As mentioned above, 3-axle HGV traffic would increase by 155.5% along the southern part of Cranford Way and 2-axle and above traffic by 38%. Damage to roads is proportional to axle weight. 8 cubic metre concrete mixer trucks carry 20 tonnes of concrete and their rear axle weights are therefore close to the maximum permissible on UK roads. Their contribution to road damage is disproportionate to their number. No assessment has been made as to whether Cranford Way can sustain such high and frequent loading.
- 3.23 Spillage of the semi-liquid ready mixed concrete from the HGVs carrying it is not uncommon, despite London Concrete claims to the contrary. There is evidence of this on the main road outside of their Wembley Plant. Each time a vehicle negotiates a bend the load shifts and, on uncovered private contractors' vehicles especially, can result in significant spillages along the road. When dry and then crushed by any vehicle tyres the resulting dust can be blown into houses, schools, shops, and other businesses on the Cranford Way estate, This also poses a serious risk to pedestrians, cyclists and occupants of other vehicles who can inadvertently inhale this airborne dust.
- 3.24 The increase in HGV traffic will result in an increase in diesel fumes. The entire borough of Haringey has already been designated an Air Quality Management Area with supplementary planning guidance setting out, amongst other things, measures to reduce emissions. London Concrete's proposal, with the increases in HGV traffic outlined above, would be in direct conflict with the Council's efforts to improve air quality in the Borough.
- 3.25 Additional HGV traffic on already congested roads and further deterioration in air quality will not alleviate impressions of decay and high levels of litter noted by the Local Agenda 21 Action Plan. Service industry investment could reduce and Crouch End and Hornsey will become a less desirable area for both business and residents.
- 3.26 Much comment has been made on the use of rail for freight delivery, but BR's report makes no comment on the importance of modern rolling stock and well-maintained track. Residents in the locality know how noisy the railway can be at night. The prospect of an increase in screeching and banging, idling diesels, aggregates being delivered and loaded into hoppers, does not bode well for increasing use of rail for freight.

Impacts on non-car means of transport and public transport.

- 3.27 The UDP states that the council will encourage walking and cycling in and around the borough, improve existing routes and further create new routes. The size and weight of the concrete-carrying HGVs and the high frequency of their movement poses new and increased hazards for road users. Proportionately more cyclists are killed or seriously injured by the larger HGVs, in urban areas, than by any other vehicles.

- 3.28 For walkers the increase in HGV traffic will mean increased air pollution. Parents will be concerned about safety of children, quite apart from the impact of air pollution, especially on those who suffer from asthma. They will be less likely to allow their children to walk or cycle to school, opting for the 'school run' and further driving up congestion and air pollution.
- 3.29 The Sustainable Haringey Local Agenda 21 Action Plan and the Mayor of London's Transport Strategy both stress the importance of bus travel as an alternative to the car. This mode of transport is particularly important in Crouch End and Hornsey, which do not have Underground stations within easy reach. The increase in HGV traffic generated by the concrete batching plant will hamper the efficient operation of many bus routes in the area – the 41, 91, W3, W5 and W7 routes could all be used by London Concrete and private contractor's vehicles. Were HGV traffic to use residential routes as short-cuts to avoid congestion this would cause real difficulties for the W3 and W5 services.

Conflict with policy developments

- 3.30 In its original application London Concrete makes much of Planning Policy Guidance Note 13 and its direction to local authorities to '*seek to enable the carrying of material by rail or water wherever possible...*'. Few would object to such a principle. However, Firstplan, LC's consultants, are narrow and selective in what they choose to support their proposal. The only paragraphs cited are those which support LC's sole claim to sustainability, the transportation of aggregates by rail. There is no attempt to consider the wider planning context – the environmental impact of delivery of materials and their transfer to the plant itself, of the industrial processes of the plant and of the increased traffic generated, all within a densely residential area.
- 3.31 Haringey's draft UDP (September 2004) contains a policy, unsurprisingly explicitly supported by London Concrete itself, which states that:
- "... 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."*
- 3.32 It is our view that LC's proposal would give rise to '*undue local disturbance*', and that any advantages accruing from the transport of aggregates by rail are far outweighed by the negative impact on the wider environment.
- 3.33 The Unitary Development Plan, the Draft Local Implementation Plan, the Living Streets Manifesto and the Road Danger Reduction Charter clearly set out issues such as traffic restraint, reducing traffic volumes and speeds, encouraging and facilitating more walking and cycling, achieving social inclusion, improving air quality and health, restriction of heavy lorries, and ensuring that new development is cycle-friendly. Were Haringey Council to approve London Concrete's application, such an approval would be in direct conflict with many of the aims and objectives set out in Haringey's own initiatives for a better environment.

4.0 NOISE

- 4.1 Cosmetically much appears to have changed with respect to noise in the latest London Concrete (LC) planning application. However closer examination reveals that little has changed since the "Statement of Objections" produced by GreenN8 last year. This is principally because further survey work by the Sharps Redmore Partnership (SRP) has finally acknowledged **that the area is not as nearly as noisy as they previously supposed** – which locals have known and maintained all along.
- 4.2 In the earlier "Statement of Objections" GreenN8 reviewed the following aspects of the SRP report and the LC submission in general.
- The SRP assessment & methodology with respect to planning law and other relevant guidelines.
 - The SRP survey of the local noise climate.
 - The development impact.
- 4.3 Rather than reproduce that report, which remains as relevant now as then, a summary illustrating the lack of change is set out below.
- 4.4 Chettle Court remains the only property to have been considered – there is no proper consideration of the effects on Uplands Road or Wightman Road. This is particularly relevant for Wightman Road now the plant has been re-orientated. Lorry movements have always been an issue for Uplands Road.
- 4.5 There is still no reference to the noise generated by night time aggregate deliveries, the operation of conveyors and the filling of hoppers. It is true that the conveyors are now enclosed but given that the report is silent on the matter it is difficult to discern what that will actually mean.
- 4.6 No significant reference is made to the effectiveness of the building cladding in terms of noise containment.
- 4.7 SRP continue to use Noise Exposure Category Levels (NECs) and World Health Organisation guideline values as part of their justification for the application even though this is specifically prohibited by (Para 4 Annex 1 of) Planning Policy Guidance (PPG) 24 "Planning & Noise".
- 4.8 PPG 24 makes it clear that the NEC exposure levels are for use only where consideration is being given to introducing residential units into an area with existing noise source (Para 4 Annex I). This view was supported by the planning inspectorate report into the London Concrete appeal relating to their Battersea depot. Point 35 of the report states *"However, the Noise Exposure Categories procedure for dwellings in PPG 24 relates to the introduction of dwellings into an area with an existing noise source rather than a new noise source into a residential area. Therefore, it is of little direct assistance in this case,"*
- 4.9 PPG 24 and BS 8233 (to which it refers) go much further with their guidance with respect to the introduction of a new noise source into an existing residential area in that the determining authority should consider the impact of the new noise source on the existing noise climate as it

is and that the area should be reasonably protected however quiet it may be. It is clear from these documents that it is not unreasonable for residents to expect their level of amenity with respect to noise to be protected from new noise sources, within reason, no matter how quiet the existing noise environment (The relevant sections are quoted in last year's GreenN8 statement).

- 4.10 London Concrete's use of NECs is an attempt to raise the noise threshold below which they must fall and is not, we consider, justified under planning law
- 4.11 The report continues to ignore the Mayor of London's Ambient Noise Strategy (MANS) which requires the noise generated by new developments to be sufficiently below existing ambient levels to prevent what it terms as "ambient creep" - a gradual escalation of noise as a result of new development. MANS suggests that new developments should be 10dB below the ambient. At best, LC's noise generation will be at current ambient levels.
- 4.12 The report has still not properly established the baseline conditions. The noise survey carried out ignored Uplands & Wightman roads. It is also quite limited with respect to the days chosen to conduct the surveys. Mondays, Fridays and particularly Saturdays have not been chosen presumably because it is well known that other activities are much less on these days and hence LC's noise generation will be proportionately more intrusive on these days.
- 4.13 The SRP report continues to use comparative noise levels "time averaged" over a 12 hour period which takes no account of morning peaks or of course LC's propensity to increase their activities over and above those stated in their planning applications once their plants are up and running.
- 4.14 SRP still have not demonstrated that the Wembley data they use is applicable to Cranford Way or referenced other published, independent data to back up their assertions.
- 4.15 SRP speculate that the lower ambient noise levels measured in their latest survey may be "*due to different meteorological conditions ... but may also may be due to less activity on the nearby commercial estate*" but have not substantiated these claims. It may be that this time SRP were able to gain access to Chettle Court and take measurements in the right place.

In summary, once again not enough work has been done to assess the local noise climate. Therefore it is not possible to properly assess the mitigation measures on offer and hence the true impact of the development on the neighbourhood. This failure to show that adequate, reliable AND enforceable mitigation measures are in place should justify refusal of this application.

5.0 ECONOMIC IMPACT

- 5.1 GreenN8's 'Statement of Objection' (Sept 2004) submitted to Haringey Council in response to London Concrete's first application, predicted that if approved, this development will create a negative economic impact.

It states:

"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.

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."

- 5.2 Unfortunately the statement above, written a year ago, has now become a reality, even before London Concrete have set foot on the proposed site. Since London Concrete submitted their application, 3 of the Cranford Way warehouses units (8, 9 and 10) became available with the departure of TNT. Despite a major renovation to all 3 units they have been vacant over the last 10 months or so with very little prospect of being rented again. The landlord of these units had plenty of interest in the units until interested businesses learn of London Concrete's application. **The continuing vacancies of units 8, 9 and 10 are a direct result of London Concrete's application.**
- 5.3 One potential occupant is a computer recycling business – Maxitech.biz – currently located in the Chocolate Factory, Wood Green. Maxitech.biz is a not-for-profit company dedicated to the provision of reuse and recycling services to companies and organisations throughout the UK. Maxitech.biz has an on-going programme to train and develop youths from socially-disadvantaged backgrounds through their work placement schemes and are looking to relocate their business as they need more space due to the welcome expansion of their social enterprise.
- 5.4 Cranford Way was Maxitech.biz's only viable option for relocation within Haringey. Maxitech.biz were seriously considering Cranford way until they learned of London Concrete's plans to build a concrete batching plant on site.
- 5.5 Computers and dust are obviously not compatible. In the event of London Concrete succeeding with their application, a business such as Maxitech.biz could not be based in Cranford Way, thereby being unable to potentially provide hundreds of badly needed jobs.

Rather they will be forced to take their employment prospect out of Haringey altogether for lack of suitable premises.

- 5.6 Cranford Way Industrial Estate was listed by the Study of Industrial Demand in LBH 2000 as one of Haringey's 21 DEA areas, recommended to retain its DEA status, **mainly due to its high rate of occupancy.**

"We believe the Council should identify a smaller number of DEAs than currently and adopt a robust presumption that these sites should be retained for B1(c), B2 and B8, use. At present, having such a presumption for 21 DEA weakens the degree of protection. Based on our survey we believe the following sites should be retained as Defined Employment Areas". – Cranford Way Industrial Estate was listed.

- 5.7 However the Haringey Employment Study does a more in-depth survey of each site and makes a proposal for each one. The site is listed as having B1 and B8 use i.e. only light industrial, not B2, and the proposal for Cranford Way is:

"This DEA is suitable for retention for continued employment use. There is relatively little scope for change within the estate. However, an opportunity exists to extend the site boundary to include the area at the far north-west of the site to the rear of the electricity sub-station in order to improve access arrangements to the site."

- 5.8 This study also notes road/traffic problems. It says that:

"road connections are particularly poor between the east and west of the borough"

and

"access from DEAs to the local road network tends to be poor. Key issues are that the existing junctions between the DEA and the local road network do not afford easy access to HGVs because the roads are too narrow and the junctions do not allow sufficient room for turning without causing disruption to traffic".

- 5.9 It does not appear that Cranford Way was recommended as being suitable for B2 use. Rather it was the fact that all the B classes were lumped together that made this a possibility. The Employment Study says that particular emphasis is given to the Mayor of London's Supplementary Planning Guidance on Industrial Capacity. This document refers to industrial and non-industrial uses without distinguishing between different types of industry.

Conflict with Planning Policies

- 5.10 A '**high rate of occupancy**' was the main reason Cranford Way Industrial Estate retained its DEA status in the newly adopted Haringey UDP, following the recommendation of 'The Study of Industrial Demand in LBH 2000.
- 5.11 Since the advent of the proposed Concrete batching plant there has been a clearly demonstrated **trend of decline in occupancy**. And this before the proposal may even be approved.
- 5.12 In addition many of the businesses currently operating on site have already indicated they will be forced out of Cranford Way in the event of LC's application being approved because of the incompatibility of their businesses with a dusty operation such as a concrete batching plant.

Some have indicated they will be forced out of business altogether because of their inability to get out of their leases. Overall, there is a clear indication that a major loss of existing employment would result in return for just 10 jobs provided by LC – jobs which are not guaranteed to go to local people. In their proposal LC state that 2 of the jobs created by a successful application will be for positions located at their head office in Brentford – not locally.

- 5.13 We would argue that approving the proposed application would be diametrically opposed to Haringey's own newly adopted policies on employment and the retention of Cranford Way as a defined employment area would be rendered useless.
- 5.14 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.

Other concrete batching plants refused and appeal held for similar reasons.

- 5.15 **RMC Management Services Ltd-v-SoS Environment [1972]** A planning application submitted by RMC for a concrete batching plant on an industrial estate was refused due to dust free requirements of 4 adjacent electronics companies.
- 5.16 Appeal was **Held** – “**It was legitimate for the Minister to have regard to the 'special' needs of 4 companies.**”

6.0 ECOLOGY

Brief Introduction

- 6.1 This report seeks to outline the main objections of residents of to the application by London Concrete Ltd to build and operate a concrete batching plant on railway land to the rear of Cranford Way.
- 6.2 This report will start by highlighting 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:
- Haringey Draft Unitary Development Plan (UDP) – Revised Deposit Consultation September 2004
 - Haringey Biodiversity Action Plan (BAP) (Consultation draft September 2002)
 - 'Better Haringey' programme
 - Local Agenda 21
 - Best Value Action Plan (Planning, Environmental Policy & Performance Business Plan Summary 2004-2007)
- 6.3 The report will then examine the desk research and field study carried out by Ecology Solutions on behalf of the applicant.
- 6.4 The report will seek to demonstrate that granting permission to erect a concrete batching plant will be detrimental to the ecology of the area and that this is not consistent with stated policies on the environment found in the above-listed five documents.
- 6.5 During the course of this report, we will call for the council to
- commission an independent study into the impact of the proposed development on the local bat population; and
 - to compile an up-to-date species list to determine if the proposed development is likely to impact negatively on any other wildlife

Haringey Council's policy on Open Space and the Environment

Unitary Development Plan (UDP)

6.6 The stated vision for this plan is:

"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."

6.7 In policy G9, the council discusses its priority areas in the borough. It is here that we find its definition of 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)

6.8 We believe it is highly significant that the designated development site is adjacent to Stroud Green Railway Bank, which is designated as an area of borough importance in schedule 11 of the UDP. Furthermore, the northern tip of the survey site forms part of a Green Corridor as defined in the UDP.

6.9 In chapter 8 of the UDP, on Open Spaces, section OS5 (entitled 'Ecologically valuable sites and their corridors') states that:

"Councils will not permit development on or adjacent to Sites of Special Scientific Interest (SSIs) ... 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."

*"Green Corridors form important links between the nature conservation sites....
...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."*

6.10 Later, in OS 15 on bio-diversity, the document states:

"All applications and development should respect the biodiversity of the borough, and ensure that the biodiversity is not diminished in any form, and that every opportunity is taken to enhance it." (para 8.36)

6.11 This issue of Bio-diversity is addressed directly and more fully in Haringey's draft Biodiversity Action Plan.

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

6.12 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.

6.13 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."

6.14 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."

6.15 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."

6.16 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."

6.17 The council recognises 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."

6.18 Specific factors affecting the species included are:

"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

6.19 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 last year. 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

- 6.20 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.

Best Value Performance Plan 2004 – 2005

- 6.21 Within this 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

- 6.22 One of the key things Planning, Environmental Policy & Performance will 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 the Ecological Assessment of Ferme Park, Hornsey, by Ecology Solutions

- 6.23 This report was produced to assess the potential environmental impact of the proposed development on the Cranford Way estate. It builds on a previous report by Cresswell Associates in 2003, commissioned for the first application and critiqued in detail as part of our submission to the application review process.
- 6.24 By way of background, it is worth noting that in this earlier submission, in September 2004, GreenN8 pointed out that the Cresswell report was based neither on an up-to-date species list, nor a bat roost survey for this area. We argued that for a true and accurate assessment of the full impact of setting up and operating a concrete factory in this location, further detailed and independent ecological studies should be undertaken.
- 6.25 Since our original observations were made, it appears that no such independent studies have been completed. To our knowledge, a site visit was made by the then council conservation officer, David Bevan for the purposes of collating an up-to-date species list, but at the time of writing the results of his findings do not appear to have arrived in the public domain.
- 6.26 Cresswell Associates' desk survey 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 Borough's Biodiversity Action Plan contains action plans for many of these habitats.
- 6.27 London Concrete's latest amended submission does nothing to address or lessen our concerns about the negative environmental impact of a concrete factory on the neighbourhood and surrounding areas.
- 6.28 It is worth noting at this stage that the ecological report's validity is in part dependent upon other reports, commissioned by London Concrete to assess the potential impact of dust and

noise from the development. If the credibility of these other reports is subject to doubt, then this fundamentally undermines the ecological assessment.

6.29 It is also of concern to us that, in contrast to Cresswell's report, the Ecology Solutions report makes no attempt to identify any mitigation procedures. Cresswell listed no fewer than SEVEN actions that needed to be taken in order to mitigate the impact on the environment.

- 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

6.30 The number of mitigation action points requested in this case clearly suggested that the impact on the ecology of this area could be considerable. In our view, it casts grave doubt on the validity of the new report that it should ignore these issues.

6.31 The Ecology Solutions report ignores other issues raised in the Cresswell report too. For example, Cresswell reported that:

“overall, there will be a decrease in the amount of semi-natural habitat within the survey area ... this will lead a small decrease in the amount of habitat suitable for use by terrestrial invertebrates, nesting and foraging birds and reptiles in the local area.”
(5.1)

6.32 And elsewhere:

“the potential exists for the indirect disturbance of breeding birds using the adjacent habitats during operation of the batching plant.” (5.3)

6.33 Ecology Solutions makes no mention of these matters. Are we to assume that they are no longer important? Or is the new report deliberately glossing over them in order to make the applicant's case appear more robust?

6.34 Ecology Solutions also claims – without any apparent supporting evidence – that:

“both the ecological [or “green] corridor and Stroud Green Railway Bank are offsite and will not be directly affected by the proposed development.” (5.7.6)

6.35 However, in para 5.2 of its report, Cresswell had admitted that the integrity of the ecological corridor would only be maintained **“to some extent”** – a critical phrase, which demands a truly independent report to assess exactly to what extent the corridor's integrity would actually be lost.

6.36 In any event, this clearly falls short of the requirement laid down in the UDP and highlighted in section 1 of this report that:

“Councils will not permit development on or adjacent to Sites of Special Scientific Interest (SSIs) ... 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.”

6.37 Elsewhere, on the subject of **birds**, Ecology Solutions admits that:

“the scrub and trees present in the western areas of the application site are likely to be used by a range of common breeding birds.” (4.5.1)

6.38 Later it states:

“in order to avoid any potential offence, it is recommended that any tree or scrub clearance is undertaken outside the bird nesting season (March to end of July).” (5.10.4)

6.39 In our view, this does not go far enough. We would again cite Cresswell:

“Stroud Green Railway Bank is also likely to provide an important feature for birds. Further surveys would be necessary in order to fully assess the value of these habitats for use by breeding birds.” (3.2.12)

6.40 But it is the presence of **bats** which we feel to be the most significant, specific wildlife concern.

6.41 Independent specialists advise that early August is the prime time to make bat recordings, as the young bats leave their roosts at this time. Ecology Solutions carried out their site surveys during the months April – June, which may explain why there were so few sightings.

6.42 A survey commissioned by a local resident and carried out last August by the London Bat Group identified **FIVE different species of bat in one night**. One of these was endangered. The report notes this to be “unusual” and suggests that “this vicinity is an important area that needs further investigation before any works proceed.”

6.43 English Nature has already written to Haringey Council (before it was made aware of residents’ sightings) to confirm paragraph 47 of the Planning Policy Guideline: Nature Conservation (PPG9). This states that the presence of a protected species is a material consideration when a local planning authority is considering a development that, if carried out, would be likely to result in harm to the species or its habitat. Furthermore, the Wildlife and Countryside Act 1981 specifies that advice should be sought from English Nature on any works that might affect bats and their roosts.

6.44 As at least one of the species recorded recently was a much endangered one, we understand it is covered by further EU laws which state that its feeding grounds are protected from development, not just its roosting grounds. The Council needs to be absolutely sure that there are no bats feeding or roosting on this site. This can only be done by commissioning an independent body to undertake proper recordings.

- 6.45 **We therefore request that the Council commissions its own independent bat survey of the site, to be carried out as soon as possible by an ecology consultant registered to record bats.**
- 6.46 We would also observe that the desk research used by both Cresswell Associates and Ecology Solutions is out of date. In order to evaluate and assess the true impact that London Concrete's proposal will have on this area, it is crucial that the Council has its own up to date species list.
- 6.47 **We request that the Council compiles its own up-to-date species list for the application site and for the Stroud Green Railway Bank. This should include an evaluation of the site as a foraging habitat for species, as well as for breeding and nesting birds.**
- 6.48 As previously stated, the findings of both Cresswell's and Ecology Solutions' reports are reliant upon the credibility of the noise and dust reports also commissioned by London Concrete. These reports claim that there will be no discernable increases in the levels of airborne dust and background noise on and around the site. However, this assertion will be hotly contested in other sections of this report.
- 6.49 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.
- 6.50 The Ecology Solutions report also makes no mention of the noise generated by the operation of the factory and the large number of HGV movements to and from the site, which have the potential to disturb breeding birds.
- 6.51 A significant additional concern arises from the plan to locate a washout and settlement pit system alongside the southern site boundary which lies adjacent to the Stroud Green Railway Bank. This is likely to result in contamination of foraging habitat by dirty run-off water from this operation.

Summarising the ecological case for refusing the development

Key factors

- 6.52 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 in 2003, effectively admits that this condition cannot be met. The Ecology Solutions report does nothing to prove otherwise.
- 6.53 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 dust.

- 6.54 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.
- 6.55 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.
- 6.56 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. The Ecology Solutions report does not, in our view, fulfil these needs as it is neither comprehensive nor independent.
- 6.57 The Cresswell report also lists no fewer than SEVEN actions that need to be taken in order to mitigate the impact on the environment. Despite the fact that these are ignored in the Ecology Solutions report, they remain valid and clearly suggest that the impact would be potentially very high.
- 6.58 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.”*
- 6.59 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)
- 6.60 Passing 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)
- 6.61 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; that is to reverse the declining bat population in the borough. A bat survey is essential to determine the potential impact of this development on the local bat population.
- 6.62 The proposed development will not improve the quality of life for people in Haringey – the stated aim of the Better Haringey programme. Asthma sufferers, babies, children, the elderly, cyclists, pedestrians and motorists will all be at risk from the factory and its associated operations.
- 6.63 The development site is dangerously close to the childrens' play area in the grounds 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.

7.0 AIR QUALITY, AIRBORNE DUST AND POLLUTION

- 7.1 Smith Grant LLP's addendum assessment dated June 2005 offers very little reassurance regarding the deterioration of air quality if London Concrete's application is successful.
- 7.2 No evidential basis for the addendum assessment is given. Smith Grant LLP's first assessment dated November 2003 was based on a site visit made on 19 February 2003. No subsequent visit is mentioned. This leads to the belief that the Addendum Assessment is solely a reworking of the first assessment with a few additional dust suppression measures added.

Dust Suppression Measures

- 7.3 **Dry batching** – The first assessment mentions on Page 3 that “*some dry batching will also be carried out*” but dry batching is not referred to in the second assessment. Dry batching raises concerns of how much will be carried out, what dust levels it may generate and what measures London Concrete would undertake to suppress dust during dry batching.
- 7.4 **Dust deposition** – the same rates of dust deposition are given in both assessments but each time without an objective baseline measurement. The given rates are sourced from *Environmental Effects of Surface Mineral Workings (HMSO 1991)* but without readings taken from the application site, and are thus not objective. A reading of comparable present dust deposition levels, at an existing LC plant would be a useful indicator.
- 7.5 SG's comment in their first assessment, Page 5 :

“The presence of busy urban roads and the industrial estate on Cranford Way, with loose potentially dusty deposits throughout, suggests that the dust deposition rates in the area are likely already to be elevated”

This is supposition and, as such, misleading.

- 7.6 **Airborne dust** – SG comments :

“The possible onset of nuisance from a particular source is said to occur when dust deposition becomes noticeable, typically at a level which is 2-3 times background levels [or 200 mg/m²/day]”

If an objective measurement is not taken initially, a nuisance cannot be correctly measured and ascertained.

Air Quality

- 7.7 The Council have declared Haringey an Air Quality Management Area, due to the high levels of airborne pollutants in the Borough. This would suggest that the Council should be looking to reduce the level of airborne pollutants rather than allowing heavy industrial processes into the borough. SG's assessment does not explain what this declaration involves and what the Council's Air Quality Action Plan entails. There is no mention either as to how or by whom the Plan will be enforced and how regularly it will be monitored.

- 7.8 The application and dust assessments often mention the utilisation of rail transport for the proposed plant, but rail transport brings with it its own air quality implications in the form of diesel fumes. Rail transport does not beneficially outweigh the additional vehicle movements caused by the proposed plant.

Local Air Pollution Control

- 7.9 London Concrete would require a Local Air Pollution Control Permit in order to operate, but this Permit is expected to be reviewed at least every 4 years. It would seem obvious that a lot of damage to health and the general environment caused by air pollution can take place in a period of 4 years.
- 7.10 Also, Local Air Pollution Control states that the tankers are to be fitted with on-board relief valves and filtration equipment *within 36 months* – surely these dust suppression measures should already be in place prior to the onset of any production?
- 7.11 Neither the first nor the second assessment fully addresses the issue of airborne dust from the HGVs. There is detail given as to how dust will be suppressed once the aggregates arrive at the plant and join the batching process, but no reassurances are made concerning any fugitive dust from the HGVs as they make their trips along the main roads of Hornsey and Crouch End.
- 7.12 SG comments on Page 11 of the first assessment :

“There are already many HGV movements in and out of the various depots on Cranford Way and it is unlikely that the additional movements will cause any discernible impact”

This is not a objective measurement of the environment at the application site, this is supposition and, as such, misleading.

- 7.13 Also, there are dust suppression concerns for the vehicles from LC's clients which would regularly visit the plant. What is the level of vehicle movements by clients, based on 50 % production and based on 100% production? Are the clients' vehicles more likely to be the older, more polluting type?

LC's existing plants and dust levels –

- 7.14 SG comments in the first and second assessments that :

“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”

Again, this is completely unsubstantiated. If no objective measurement has been taken then this claim is meaningless.

Conflicts with local and national policies

- 7.15 The first and second dust assessments appear to conflict greatly with Haringey Council's aims for a Better Haringey. For instance, the second deposit UDP states :

2.10b The whole of the borough has been declared an Air Quality Management Area. The council is implementing its Air Quality Action Plan to seek improvements to air quality.

- 7.16 In this instance, it is very difficult to believe that the additional vehicle movements, in particular, HGVs, would not adversely affect air quality. The utilisation of rail transport brings with it its own air quality implications in the form of diesel fumes.

- 7.17 There is conflict with national guidelines, in that, the Central Government's Planning Policy Statement 23 (Planning and Pollution Control), which all LPAs should take into consideration, states :

“The Precautionary Principle should be invoked when there is good reason to believe that harmful effects may occur to human, animal or plant health, or to the environment...”

“Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the release of substances to the environment from different sources to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health.”

- 7.18 Planning Policy Statement 23 continues :

National and International Obligations

“A number of national and international obligations are important in controlling pollution ...

The Air Quality Strategy (2000) and its Addendum (2003) and the system of local air quality management under Part IV of the Environment Act 1995 ...

The EC Directives on the Assessment of Environmental Effects ... requires the assessment of environmental effects of specified public and private projects before development consent is granted”

- 7.19 In particular, this last point would show a clear duty on the part of Haringey Council to carry out full independent assessments on the application site.

- 7.20 Further, Planning Policy Statement 2, National Planning Policies 8 states :

“Plan policies and planning decisions should be based on:

- up-to-date information on the environmental characteristics of the area;*
- the potential impacts, positive as well as negative, on the environment of development proposals (whether direct, indirect, cumulative, long-term or short term); and,*
- recognition of the limits of the environment to accept further development without irreversible damage.”*

Summary

- 7.21 The dust suppression measures mentioned in Smith Grant's Addendum Assessment are, at best, selective and partially researched.
- 7.22 The application conflicts with existing UDP, London and national guidelines.
- 7.23 We request that Haringey Council postpone any decision on this application until an independent assessment of the environmental impact has been published. This assessment must include readings taken from the proposed site and the surrounding environments.

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 grant 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 In addition to the Conditions and Obligations outlined in the September 2004 document it is extremely important that further Conditions in respect of noise, dust, pollution and ecology are also imposed.
- 8.4 The exact nature of these Conditions is difficult to quantify at this stage given the lack of baseline information particularly with respect to the presence of protected species. However, each condition should begin with a requirement to carry out proper surveys to establish existing conditions so that appropriate measurable targets may be set for the development to achieve.
- 8.5 An example Condition, with respect to noise, recently imposed by the Corporation of London is reproduced below.
- The rating level of noise emitted from any new plant shall be lower than the existing background noise level by at least 5dB. The noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The measurements and assessment shall be made in accordance with BS 4142: 1997.

Reason: To protect the amenities of neighbouring occupiers in accordance with the policies of the Unitary Development Plan 2002.

9.0 OVERALL CONCLUSIONS

- 9.1 On the basis of the September 2004 “Statement of Objections” and the preceding sections the following conclusions may be drawn.
- 9.2 There is no economic need for a concrete batching plant to serve the Haringey construction market. There are no local or national interests served by granting this application. In fact, locally, far from providing local employment, this development will drive out other local businesses and the area will be the poorer for it.
- 9.3 In an area with relatively high unemployment the future of the community is best served by attracting modern, high tech. post industrial jobs (particularly those with community links and those committed to training) rather than driving these opportunities away with dirty and unneeded industrial processes.
- 9.4 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.”*
- 9.5 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.
- 9.6 The form this harm will take is unclear given the lack of an up-to-date species list or bat roost survey of this area. Further detailed ecological studies are required before a decision on this proposal can be safely made.
- 9.7 With regard to noise issues, the survey of current background noise conditions submitted by the applicant is inadequate and conclusions drawn on the basis of it must be extremely doubtful. This information does not provide an adequate basis to determine this application.
- At best the new development will contribute to the “ambient creep” increase of the local noise environment at worst it will increase environmental noise levels considerably.
- 9.8 The overall impact of the London Concrete – generated increase in traffic, taking into account the contractors collecting with their own vehicles, will be an increase of MGW / HGV activity alone, along Tottenham Lane, well in excess of the 10% threshold required to trigger further investigation.
- 9.9 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 to walk or cycle to school, and will drive them, in turn adding further to traffic congestion and air pollution.

- 9.10 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.
- 9.11 Case histories of London Concrete's operations elsewhere in London, including 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 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.
- 9.12 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: GREEN N8 LIST OF REQUESTED SURVEYS AND TESTS

To be commissioned by Haringey Council with regard to London Concrete's planning applications

It is very important that the following reports are commissioned. They will enable Haringey Council to oppose the application by London Concrete with confidence.

Should these independent reports not be undertaken, there will be no independent information available that clearly defines the existing conditions at Cranford Way and the surrounding environs.

This would be disastrous for the future. In the event of London Concrete winning their current application, should there ever be cause to challenge London Concrete or its agents on issues of noise, excessive dust emissions etc, the only statistics that will be available to back up a challenge will be the ones provided by London Concrete in their application. The potential lack of independent reports today would ensure that London Concrete be virtually impervious to all challenges, no matter how reasonable.

TRANSPORT

1. The transport assessment carried out by Bellamy Roberts (BR) on behalf of London Concrete is deficient in a number of areas. The original report and the summary produced in July 2005 both take a very narrow view of the transport implications posed by the development, concentrating on only two aspects – the contribution their scheme would make to the volume of traffic, and how, in their view, their scheme is in alignment with Government road to rail policy for freight.

In our earlier report we criticised the measurement of traffic volume as misleading, due to flawed methodology that does not compare the traffic flow of vehicles on a like-for-like basis, masking the true impact of the increase in HGV vehicles. We now make the following points in support of our request for further surveys to be carried out to assess the likely impact of the development, all relating to transport issues ignored by BR's assessment. They relate to traffic volumes and capacity; vulnerable road users and wear and tear on the highway system.

1.1 Traffic volumes and capacity

BR's assessment of traffic capacity is restricted to Cranford Way and the Tottenham Lane / Cranford Way junction. It takes no account of the traffic volume on Church Lane /Tottenham Lane as it proceeds into Crouch End, and the Church Lane / Hornsey High Street junction. It is likely that the traffic density here will be much greater along Church Lane, as it is narrower and more residential than Tottenham Lane / Cranford Way.

1.2 The restricted space (90 degree bend) for vehicles turning right into Church Lane has not been discussed.

1.3 There is no mention of the extreme road narrowing of Tottenham Lane as it proceeds into Crouch End, occurring just before the Church Lane junction.

1.4 Recommendation: We request that Haringey Council commission independent 12 hour surveys to consider the above issues. This monitoring must of course take place during normal peak traffic flows, i.e. when schools have fully returned from the summer holiday.

1.5 Impact of private contractors vehicles. London Concrete have admitted that a significant part of their business is derived from private contractors who will collect Ready Mix Concrete in their own HGVs. In BR's report to Haringey Council, in support of London Concrete's application, this factor has been completely ignored. No attempt was made to look at what impact this additional HGV traffic would have on the local area, in terms of traffic density and efficiency of collection, spillage rates, soiling of local roads etc. If an average of only 25 loads of ready-mix are collected by contractors daily then there will be an additional 50 HGV movements a day. If private contractors are supplied, then London Concrete will need to send in extra supplies of cement daily, resulting in a further 2-4 HGV movements each working day. These additional 54 HGV movements need to be added to the 56 movements of London Concrete's own HGVs, making a total of 110 HGV movements.

1.6 Delivery by London Concrete and collection by private contractors is most likely to be concentrated between 8am and 4pm so that supplies arrive on building sites during the times when they can be dealt with by the workers there. London Concrete's vehicles will, on average, result in 7 movements each hour, add in the contractors HGVs and this will increase the movement into and out of Cranford Way from Tottenham Lane to nearly 14 movements per hour. This amounts to one movement every four minutes! The average movement, (for the same 8 hour period) of all types of HGVs along this section of the one-way system, according to BR's survey on 13th March 2003, was 16. **London Concrete's presence in Cranford Way will effectively double the amount of HGV traffic movements.** The vehicles carrying concrete and the daily cement supplies will all be at the top of the HGV range and all carrying significant loads.

1.7 Recommendation: This is a critical aspect of the proposal that has so far been wholly neglected by both London Concrete and Haringey Council. We request that Haringey Council commission an independent survey to assess the likely volume of private contractors vehicles which might collect direct from the plant, and also provide an assessment of the environmental impact that the types of vehicles typically used by contractors (covered or uncovered) could cause (from spillage, air pollution) and their safety characteristics. It is vital that more work is done on this aspect of the proposal to give an accurate assessment of its likely impact.

2. Vulnerable road users – pedestrians and cyclists

2.1 There is no consideration of the impact on vulnerable road users (pedestrians and cyclists) in the immediate vicinity and the surrounding area. In 2003 12.3% of all pedestrian deaths were caused by HGVs as were 22% of all cyclist deaths. Accidents involving cars were the major cause of such deaths (over 60%), but as there are far fewer HGVs than cars on the roads these large vehicles are proportionately responsible for a highly significant number of deaths, and serious injuries to pedestrians and cyclists.

2.2 Recommendation: We would like Haringey to investigate what impact the additional HGV movements will have on the decisions of people walking or cycling to work and on parents deciding whether their children are allowed to walk and cycle to school.

2.3 Recommendation: We would like to know what steps Haringey Council would take to ensure that London Concrete and their private customers obviate the risk of any collisions with pedestrians and cyclists.

3. Material impact on highways

3.1 Haringey Council has admitted that there will be a material impact on highways but have not given any detail on how road surfaces will be affected and what the impact on road maintenance is likely to be. Local residents and businesses will be inconvenienced by delays caused by any repair work. As the volume of heavily loaded HGVs using Tottenham Lane and other local roads is likely to more than double will London Concrete be asked to contribute, on an annual basis, to meet the increased costs?

3.2 BR in their report have ignored the poor state of much of Cranford Way. Many of the current Unit leaseholders are very concerned that the increase in HGV traffic, of the laden weight levels which are likely, cannot be borne by the current road. They are also concerned that concrete vehicles are likely to block their use of the road and access to parking outside of their buildings.. They will bear a heavy cost if they cannot secure and make deliveries from their businesses.

3.3 Recommendation: Surveys and road engineering assessments should be carried out by Haringey to ascertain the impact of London Concrete's Proposed Batching Plant on local roads and businesses.

4. Recent policy developments

The Unitary Development Plan, the Draft Local Implementation Plan, the Living Streets Manifesto and the Road Danger Reduction Charter clearly set out issues such as traffic restraint, reducing traffic volumes and speeds, encouraging and facilitating more walking and cycling, achieving social inclusion, improving air quality and health, restriction of heavy lorries, and ensuring that new development is cycle-friendly.

4.1 Recommendation: We would like to know how this development accords with new proposals set out in the Unitary Development Plan, the Draft Local Implementation Plan, the Living Streets Manifesto and the Road Danger Reduction Charter (Haringey Council has signed up to the final two proposals in the list).

AIR QUALITY, AIRBORNE DUST, GROUND POLLUTION

5. Assessing current conditions at all receptor points immediately affected: Stroud Green Railway Bank, Chettle Court, Uplands Road, Wightman Road, Tottenham Lane and Church Lane.

5.1 London Concrete have admitted in the last public forum that their operations cause a dust footprint radius of some 250 meters. This footprint, when applied to the area around the proposed site, includes many Schools, Nurseries and After-School Clubs – Weston Park School, Hornsey School for Girls and YMCA to name a few.

5.2 A study to assess the current conditions at all receptor points with regards to

Air pollution caused by Traffic

- traffic, in particular HGV's
- train locomotives

5.3 A study to assess the current conditions at all receptor points with regards to **Air and Ground pollution caused by Dust from**

- Aggregate
- Silica
- Cement

5.4 A study to assess the current conditions at the actual proposed site location for **Wind**

- Direction
- Force
- Frequency

Both London Concrete dust reports rely on statistics measured at Heathrow. However, due to the shape of the local landscape in the area surrounding the application site, the direction, force and frequency of local winds are unique to the locality and do not follow the patterns measured at Heathrow. The original assessment submitted by London Concrete's consultants offers no consideration of the effects on air and dust movement generated by the constant movement of trains which travel at vastly varying speeds past the proposed site.

6. Assessing London Concrete's operation and its impact. There are another 8 such plants in London where this can be measured and tested.

6.1 Air pollution caused by added traffic of London Concrete's operation

- Company's HGV movements
- Private contractors HGV movements*
- Cement Road Tankers
- Freight train locomotives and associated wagons**

The impact on air pollution caused by the above list could be added to measurements found in the proposed test mentioned in Section **5.2**, once true numbers of car movements are established.

* Private contractor HGV's are not controlled by London Concrete. It has been noted close to other LC sites around London that Private Contractor's trucks are often very dirty, with visible clouds of dust blowing off the vehicles when they are on the roads. This apparent ease of contamination should be seen as a matter of concern.

** Locomotives will emit exhaust fumes, whilst the wagons of aggregate which they haul will also be depositing dust as they travel across the rail network.

6.3 Airborne Dust of

- Aggregate
- Silica or
- Cement

Here we suggest **measurements of all the above are taken** in and around London Concrete's other batching plants.

Although LC have amended their plans to cover all dusty operations, closer inspection of their plans and associated documents reveal it will not be fully covered.

A major concern which will affect the wider community would be the dust caused by spillage of concrete mix deposited along the route the mixer trucks (HGV's) travel between the batching plant and their delivery destinations.

As we learned from residents closer to other LC plants, the spillage of ready mixed concrete causes the whole area to become dustier as other cars drive on it pulverise it to fine air borne dust.

Or in the case of it hardening (setting), causing road surface to deteriorate rapidly.

6.4 Dust and air pollution impact on community health

... Here we suggest a desk study of the areas where London Concrete are currently operating batching plants, to assess the impact on health of the local community by comparing statistics of respiratory illness before and after London Concrete batching plants were built.

NOISE

7. Cosmetically much appears to have changed with respect to noise in the latest London Concrete (LC) planning application. However closer examination reveals that little has changed since the "Statement of Objections" produced by GreenN8 in 2004. This is principally because further survey work by the Sharps Redmore Partnership (SRP) has finally acknowledged what locals have known all along – that the area is not as nearly as noisy as they previously supposed.

7.1 In that statement GreenN8 reviewed the following aspects of the SRP report and the LC submission in general.

The SRP assessment & methodology with respect to planning law and other relevant guidelines.

The SRP survey of the local noise climate.

The development impact.

Rather than reproduce that report, which remains as relevant now as then, a summary illustrating the lack of change is set out below.

7.2 Chettle Court remains the only property to have been considered – there is no proper consideration of the effects on Uplands Road or Wightman Road. This is particularly relevant for Wightman Road now the plant has been re-orientated towards them, whilst lorry movements have always been an issue for Uplands Road and Crouch End in general.

7.3 There is still no reference to the noise generated by night time aggregate deliveries - either arrivals/departures or unloading, the operation of conveyors and the filling of hoppers. It is true that the conveyors are now to be enclosed but given that the report is silent on the matter it is difficult to discern what that will actually mean.

7.4 SRP continue to use Noise Exposure Levels and World Health Organisation guideline values as part of their justification for the application even though this is specifically prohibited by Planning Policy Guidance (PPG) 24 “Planning & Noise”.

7.5 The report continues to ignore the Mayor of London’s Ambient Noise Strategy (MANS) which requires the noise generated by new developments to be sufficiently below existing ambient levels to prevent what it terms as “ambient creep” - a gradual escalation of noise as a result of new development. MANS suggests that new developments should be 10dB below the ambient. At best London Concrete’s noise generation will be at current ambient levels.

7.6 The report has still not properly established the baseline conditions. The noise survey carried out ignored Uplands & Wightman roads – it is also quite limited with respect to the days chosen to conduct the surveys. Mondays, Fridays and particularly Saturdays have not been chosen presumably because it is well known that other activities are much less on these days and hence London Concrete’s noise generation will be proportionately more intrusive on these days.

7.8 The SRP report:

- i. continues to use comparative noise levels “time averaged” over a 12 hour period which takes no account of morning peaks nor of course London Concrete’s propensity to increase their activities over and above those stated in their planning applications once their plants are up and running.
- ii. has not demonstrated that the Wembly data they use is applicable to Cranford Way or referenced other published, independent data to back up their assertions.
- iii. speculates that the lower ambient noise levels measured in their latest survey may be “due to different meteorological conditions ... but also may be due to less activity on the nearby commercial estate” but have not substantiated these claims. It may be that this time SRP were able to gain access to Chettle Court and take measurements in the right place.

7.9 In summary, once again not enough work has been done to assess the local noise climate, it is therefore not possible to properly assess the mitigation measures on offer and hence the true impact of the development on the neighbourhood. This failure to show that adequate, reliable & enforceable mitigation measures are in place should justify refusal of this application.

8. Assess the local noise climate at all receptors points of the proposed site

- Chettle Court
- Back of Uplands Road – top, mid, and bottom
- Back of Wightman Road

We suggest that the local level of noise needs to be measured over a period of **24/7** – 24 hours over a whole week including weekend.

8.1 Assess the noise London concrete operation generates in any of their other plants

- The noise and vibration the freight on rail will generate in the middle of the night including times when diesels are idling.
- The noise generated by the wagons unloading aggregate into their conveyor system
- The noise generated by the associated conveyors
- The noise generated by filling the mixing silos
- The noise generated by dropping aggregate into metal containers (silos)
- The noise generated by the mixing process
- The noise generated by alarms and other public address systems
- The noise generated by the HGV's travelling into, through and from the site

8.2 Assess the noise impact

- By overlapping the noise London Concrete's operation generates on top of local noise climate

8.3 In their amended planning application, London Concrete have introduced some changes with the aim to address residents concerns over the issue of noise. Those changes include

- **5 meter high acoustic wall** facing Chettle Court only. This wall will not be as effective as suggested due to 1). the landscape of this site and 2). the way sound travels in all directions – 360 degrees omni-directional.
- This wall is supposed to block the sound of HGV's but looking at the plan - it will not do anything to block the noise which will come from Mixer trucks travelling to and from the site, when they may be standing with engines idling, or in the process of reversing, their warning alarms constantly beeping; or when and where they will be washed!
- **The cladding** of the main building and store bins have been introduced **“to provide aesthetic styling”** as highlighted by Firstplan in the main application report, Section 3.8. **It appears to have very little to do with reducing noise. We require more detailed information about the cladding and clear indications as to its usefulness in reducing noise. We require more detailed information about the cladding and clear indications as to its usefulness in reducing noise.**

ECOLOGY AND THE PRESENCE OF BATS

9. As part of its original proposal, an ecological appraisal was commissioned on behalf of London Concrete and was carried out by Cresswell Associates. However, as an earlier statement of objection submitted to Haringey Council by GreenN8 pointed out, this was based neither on an up-to-date species list, nor a bat roost survey for this area. GreenN8 argued that for a true and accurate assessment of the full impact of setting up and operating a concrete factory in this location, further detailed and independent ecological studies should be undertaken.

London Concrete has recently re-submitted its application, with amendments and commissioned a further ecological appraisal by a different consultancy – Ecology Solutions.

One of our major concerns remains that both appraisals have failed to identify the significant bat activity in this area that we, as residents, know exists.

Bats

9.1 Independent specialists advise that early August is the prime time to make bat recordings, as the young bats leave their roosts at this time. Ecology Solutions carried out their site surveys during the months April – June, which may explain why there were so few sightings.

9.2 A survey commissioned by a local resident and carried out last August by the London Bat Group identified 5 different species of bat in one night. One of these was endangered. The report notes this to be ‘unusual and suggests that this vicinity is an important area that needs further investigation before any works proceed.’

9.3 English Nature has already written to Haringey Council (*before* it was made aware of residents’ sightings) to confirm paragraph 47 of the Planning Policy Guideline: Nature Conservation (PPG9). This states that the presence of a protected species is a material consideration when a local planning authority is considering a development that, if carried out, would be likely to result in harm to the species or its habitat. Furthermore, the Wildlife and Countryside Act 1981 specifies that advice should be sought from English Nature on any works that might affect bats and their roosts.

9.4 English Nature also wrote to the Council after the London Bat Group Survey – see letter to Jenny Cooper – and confirmed that the findings of this report led them to advise the Council that they may wish to commission their own Ecological Survey including bat recordings, before allowing any development of this area.

9.5 As at least one of the species recorded recently was a much endangered one, we understand it is covered by further EU laws which state that its feeding grounds are protected from development, not just its roosting grounds. The Council needs to be very sure that they can prove there are no bats feeding or roosting on this site. This can only be done by commissioning an independent body to undertake proper recordings.

9.6 We request that the Council commissions its own independent bat survey incorporating three site visits during August and a written report of the findings of the site, to be carried out as soon as possible by an ecology consultant registered to record bats.

Habitat and Species

10. The application site lies adjacent to the Stroud Green Railway Bank, a designated Site of Borough Importance and an established 'Ecological Corridor', which forms a vital link in the 'Green Chain' allowing species safe access from one foraging ground to another. The degradation of this area will diminish and ultimately destroy the foraging habitat for existing species and deny this vital access to other valuable sites of conservation in the borough. In addition, the value and quality that the existence of this small green space adds to the amenity of Haringey residents living right up against the boundary of the site will be lost forever.

10.1 We are concerned that the findings of a site survey conducted by Haringey's former conservation officer, David Bevan have not yet been made available. The desk research used by Cresswell Associates and, to some extent, by Ecology Solutions is clearly out of date and, in order to evaluate and assess the true impact that London Concrete's proposal will have on this area, it is crucial that the Council has its own up to date species list.

10.2 We request that the Council compiles its own up-to-date species list for the application site and for the Stroud Green Railway Bank. This should include an evaluation of the site as a foraging habitat for species, as well as for breeding and nesting birds.

APPENDIX 3: DETAILS OF BAT SPECIES IN AREA OF THE APPLICATION SITE

[Information awaited and to be provided later]