

Our Ref: 16359/VW  
Your Ref: PP-05731069  
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Date: 17 March 2017

Planning Department  
Haringey Council  
Level 6, River Park House  
225 High Road  
Wood Green  
London  
N22 8HQ

Dear Sir/Madam

**PLANNING APPLICATION FOR VARIATION OF CONDITIONS 3, 27, 28 AND 29 ATTACHED TO  
PLANNING PERMISSION REF: HGY/2005/0007  
LONDON CONCRETE BATCHING PLANT, FERME PARK DEPOT, CRANFORD WAY, HORNSEY,  
LONDON, N8 9DG**

**1. Introduction and Summary**

We are instructed by our client, London Concrete Ltd, to submit the enclosed planning application for the variation of conditions 3, 27, 28 and 29 attached to planning permission ref: HGY/2005/0007. This permission was granted on appeal on 2 June 2006 (ref: APP/Y5420/A/05/1189822) for the erection of a concrete batching plant, with associated hoppers, conveyors and ancillary facilities.

The application has been submitted via Planning Portal (ref: PP-05731069) and the following information, in addition to this letter, comprise the application submission:

- Completed Application Forms and Certificate C;
- Notice Published in Tottenham and Wood Green Independent, dated 17 March 2017;
- CIL Form
- Site Location Plan (ref: 2506-80A);
- Transport Statement - prepared by Bellamy Roberts LLP (March 2017);
- Appeal Decision dated 2 June, 2006

The requisite planning fee of £195 has additionally been paid online via Planning Portal.

As noted above the application was granted at appeal in 2006 with a number of conditions attached. The Plant has proved to be much more successful than was originally envisaged. As a direct result of the demands of construction projects in the surrounding area and higher than expected demand for concrete vehicle movements generated by the plant are exceeding the various limits imposed by Conditions 3, 27, 28 and 29 of the original consent. In consultation with London Borough of Haringey (LBH) this application is being made to regularise the situation.

In summary the application proposes to:

- Vary condition 3: to increase the number of operational mixer trucks that can be based at and operate from the site;
- Vary Condition 27: to increase the number of operational mixer truck movements allowed per day;
- Vary Condition 28: to increase the number of private concrete vehicle movements allowed per day; and
- Vary Condition 29: to increase the number of cement deliveries allowed by road per day.

## 2. Site Description

The application comprises a rail served concrete batching plant, together with associated hoppers, conveyors and ancillary facilities. The site is immediately adjacent to the section of the East Coast Main line railway which extends between Hornsey and Haringey railway stations. The site is relatively flat and comprises part of the railway sidings land. The land immediately abuts the Cranford Way Industrial Estate to the north-west. The industrial estate largely comprises distribution and storage units.

Access to the application site is from Cranford Way, which leads onto Tottenham Lane (A103).

To the south the site is bounded by an embankment, further to the south of which, and at a much higher level is Chettle Court, a five storey block of flats. There are further residential properties located to the west of the site on Uplands Road, but separated from the application site by the Industrial estate. To the east of the site, on the other side of the East Coast Mainline there are further residential properties located on Whightman Road.

## 3. Relevant Planning History

Planning permission was granted on appeal (ref: APP/Y5420/A/05/1189822) on 2 June 2006 for “the erection of a concrete batching plant, with associated hoppers, conveyors and ancillary facilities” (ref: HGY/2005/0007).

Condition 3 attached to this permission restricts the number of operational mixer trucks as follows:

*“Vehicles transporting concrete from the batching plant shall be either operational mixer trucks or private concrete vehicles, and no other type of vehicles. Other than in the types of emergency situations which have been submitted to and approved in writing by the local planning authority prior to the commencement of the development hereby permitted, a maximum of five operational mixer trucks shall be based at or operate from the site on any one day. Details of the five mixer trucks operating from the site (including vehicle registration numbers) shall be provided in writing to the local planning authority prior to commencement of concrete batching, and any subsequent changes in these details shall be notified in writing to the local planning authority within 14 days.”*

Condition 27 attached to this permission restricts the number of operational mixer truck movements as follows:

*“There shall be no more than an average of 50 operational mixer truck movements per day to and from the site (i.e. 25 in and 25 out) on a five day average (Monday to Friday) with a maximum of 60 operational mixer truck movements (i.e. 30 in and 30 out) on any*

*one day (Monday to Friday) or 30 operational mixer truck movements (i.e. 15 in and 15 out) on a Saturday. The average shall be taken over the five days (Monday to Friday) in any one week.”*

Condition 28 attached to this permission restricts the number of private concrete vehicle movements as follows:

*“There shall be no more than an average of six private concrete vehicle movements to and from the site (i.e. 3 in and 3 out) on a six day average (Monday to Saturday) with a maximum of 10 private concrete vehicle movements (i.e. 5 in and 5 out) on any one day (Monday to Saturday). The average shall be taken over the six days (Monday to Saturday) in any one week.”*

Condition 29 attached to this permission restricts the number of cement deliveries as follows:

*“There shall be no more than an average of nine deliveries of cement (including cement replacement products such as pulverised fuel ash) by road per day to the site, on a six-day average (Monday to Saturday), with a maximum of four deliveries in any one day (Monday to Friday) or two deliveries on a Saturday. The average number of deliveries to be taken over the six days (Monday to Saturday) in any one week.”*

#### 4 **Application Proposal**

The proposal seeks to vary Conditions 3, 27, 28 and 29 attached to planning permission ref: HGY/2005/0007 as follows:

i) Condition 3: No. of operational mixer trucks

Five operational mixer trucks are currently permitted to be based at or operate from the site. It is proposed to increase this number to a total of eleven. The details of the eleven proposed mixer trucks are provided below:

<b>Operator (Franchisee)</b>	<b>Vehicle Registration No.</b>
Mark Ivey	WX57 NRV
Mark Ivey	KU65 KFT
John Clifford	WX57 NNP
Paul McGroarty	WX08 BZG
Ovi Cirilig	WR61 WJD
Rasvan Irimia	KU62 CEJ
Adi Scarlat	WU64 AUA
J P M Haulage	LM57 XDE
Procrete Ltd	WX08 RWJ
Mick Lavell	WX07 EEG
Ray Hodgson	LM58 ZVD

It is therefore proposed to vary the wording of Condition 3 to read as follows:

*“Vehicles transporting concrete from the batching plant shall be either operational mixer trucks or private concrete vehicles, and no other type of vehicles. Other than in the types of emergency situations which have been submitted to and approved in*

*writing by the local planning authority prior to the commencement of the development hereby permitted, a maximum of eleven operational mixer trucks shall be based at or operate from the site on any one day. Any changes to the details of the eleven mixer trucks operating from the site (including vehicle registration numbers) shall be notified in writing to the local planning authority within 14 days.”*

ii) Condition 27: No. of operational mixer truck movements

It is proposed to increase the number of operational mixer truck movements permitted and it is therefore proposed to vary the wording of Condition 27 to read as follows:

*“There shall be no more than an average of 150 operational mixer truck movements per day to and from the site (i.e. 75 in and 75 out) on a five day average (Monday to Friday) with a maximum of 180 operational mixer truck movements (i.e. 90 in and 90 out) on any one day (Monday to Friday) or 90 operational mixer truck movements (i.e. 45 in and 45 out) on a Saturday. The average shall be taken over the five days (Monday to Friday) in any one week.”*

iii) Condition 28: No. of private concrete vehicle movements

It is proposed to increase the number of private concrete vehicle movements permitted and it is therefore proposed to vary the wording of Condition 28 to read as follows:

*“There shall be no more than an average of eighteen private concrete vehicle movements to and from the site (i.e. 9 in and 9 out) on a six day average (Monday to Saturday) with a maximum of 30 private concrete vehicle movements (i.e. 15 in and 15 out) on any one day (Monday to Saturday). The average shall be taken over the six days (Monday to Saturday) in any one week.”*

iv) Condition 29: No. of cement deliveries

It is proposed to increase the number of cement deliveries permitted and it is therefore proposed to vary the wording of Condition 27 to read as follows:

*“There shall be no more than an average of nine deliveries of cement (including cement replacement products such as pulverised fuel ash) by road per day to the site, on a six-day average (Monday to Saturday), with a maximum of twelve deliveries in any one day (Monday to Friday) or six deliveries on a Saturday. The average number of deliveries to be taken over the six days (Monday to Saturday) in any one week.”*

## 5. Relevant Planning Policies

The Haringey Policies Map (2013) identifies the site as falling within a Locally Significant Industrial Site – Cranford Way, N8.

The National Planning Policy Framework (NPPF) (2012) sets out that in the context of employment land, investment in business should not be over burdened by the combined requirements of planning policy expectations (para 21). In the context of promoting sustainable transport, the NPPF confirms that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people (para 35).

With regard to the London Plan, Policy 4.4 seeks a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and

related uses, including the protection of locally significant industrial sites. Policy 5.20, Aggregates, seeks to encourage the importation of aggregates to London by sustainable transport modes.

Haringey's Local Plan: Strategic Policies (2013) sets out that the Council will safeguard the Locally Significant Industrial Sites (LSISs) where they continue to meet demand and the needs of modern industry and business. Saved Policy UD3 of Haringey's UDP (2006) requires proposals to demonstrate that they would not significantly affect the public and private transport networks, including highways or traffic conditions.

The LSIS designation at the application site is proposed to be retained in the emerging draft Local Plan development documents. Draft Policy DM37 in the draft Development Management DPD (2016) supports the proposed intensification of employment land, including LSISs.

## **6. Planning Considerations**

The proposal seeks to vary Conditions 3, 27, 28 and 29 attached to planning permission ref: HGY/2005/0007 in order to increase the number of operational mixer trucks based at and operating from the site, and to increase the number of operational mixer truck and private concrete vehicle movements, together with the number of cement deliveries.

As stated previously the application is made on the basis that the plant has proved to be much more successful than anticipated at the time the original application was made. Indeed, London Concrete have confirmed a significant and unprecedented increase in demand for concrete in recent years, reflecting the increase in construction of a number of development schemes within London, including within and around the Haringey area. In the local area this increased demand is, in part, due to the large number of planning consents that the LPA have granted, which in turn has increased the level of construction activity.

Indeed, to provide further context of the increased demand across London, in the year that planning permission was granted (2006) the sales of ready mix concrete in the London MPA market comprised 2,370,000 m<sup>3</sup>. Sales in 2016 increased by over 50% to 3,640,000 m<sup>3</sup>. This is despite the number of concrete batching plants across London remaining relatively static, increasing on average by less than 10% over the same period.

This application relates to an existing concrete batching plant situated in a defined Locally Significant Industrial Site (LSIS), which is a very well established industrial area. Indeed, the industrial nature of the application site and wider surroundings, on which the Inspector decided the appeal, has changed little since consent was granted. The site also retains its designation of employment land in respect of the LSIS, which is also proposed to be retained in Haringey's emerging draft DPD. As such, the planning policy context in which the plant operates remains in support of the industrial use of the site and it is on this basis that the proposed variation to planning permission ref: HGY/2005/0007 is sought. Critically, the principle of the proposed intensification of use at the application site, in land use terms, is supported by the relevant adopted and emerging policies.

In respect of highways matters, the submitted highways assessment demonstrates that the proposed increase in the number of vehicle movements is acceptable with regard to the impact on the surrounding highways network. As such the proposal will be in accordance with Policy UD3. In particular it concludes that:

***“Overall, therefore, analysis demonstrates that there are no materially adverse traffic and environmental impacts (including road safety) arising out of the London Concrete related traffic when operating at the levels which would be permitted by the proposed variation to the original planning conditions. London Concrete related traffic represents only a very small percentage of total flows on the local roads, even when converted to***

***PCUs to reflect the additional impact of HGVs. Total PCU flows on local roads including the current London Concrete related traffic are now generally lower than in 2005 when consent was granted for the Plant. There is, therefore, no traffic or road safety related basis why the proposed variation to Conditions 3, 27, 28 and 29 should not be considered acceptable.***

There are of course in addition other material considerations relevant to the application proposals.

It is important to underscore that the London Concrete operation comprises a highly sustainable form of development. All aggregate is delivered to the site by rail. This means the only road based movements associated with the development are in respect of onward delivery of concrete to the local construction market, which cannot practically be supplied by rail and for the importation of cement to the site which cannot be economically delivered to site by rail. As compared to a fully road serve plant – the ability to import material by rail has significant HGV road mile savings and other environmental benefits.

The Minerals Products Association (MPA) and Rail Freight Group (RFG) recently produced a Briefing Note entitled “Why is Rail Freight Vital for Housing and Construction”. This helps to illustrate the importance of rail served sites such as Ferme Park, Hornsey in terms of the contribution they make to sustainably supplying the construction industry. The Briefing Note confirms –

- One train can carry enough material to build 30 houses;
- A single train can replace 75 or more lorry journeys;
- CO2 emissions per tonne of material delivered by rail are 76% lower than by road; and
- 40% of aggregates used in London are delivered by rail.

The application site is therefore well placed to meet the increase in demand for concrete in the surrounding area in a sustainable manner. In this context it is important to highlight that demand is not driven by a plant being built or by the increase in its capacity to distribute concrete. It is driven solely by the number of construction projects in the surrounding area which require the material being produced. If this plant cannot service that demand then concrete will be sought from other plants which are likely to be located further from the source of demand (resulting in greater HGV road miles) and indeed may be sourced from a less sustainably served plant which is not rail served by aggregate.

As noted already there has been significantly more demand for concrete from this plant than was anticipated at the time of the application and London Concrete have as a result been operating under the terms of the proposed revised conditions for in excess of 2 years. They acknowledge that permission should have been sought sooner to vary those conditions and the applicant has sought to work proactively to put an application submission together in response to the request by LB of Haringey. However, it is relevant that the operation of the plant at the level for which the conditions are now sought to be regularised has been undertaken to date without any direct complaint to the applicants in terms of their increased vehicle movements and it is understood without any direct complaint to the LPA in that respect either.

## **7. Conclusions**

In the light of the above, it is considered that the proposed variation to Conditions 3, 27, 28 and 29 attached to permission ref: HGY/2005/0007, is wholly compliant with the relevant adopted and emerging planning policy objectives and relevant designation of the application site. Critically the proposed increase in the number of vehicle movements has been comprehensively addressed and it has been demonstrated that there are no traffic or road safety related basis why the proposed variations should not be considered acceptable. The site has been operational at the levels set out by the variation of the conditions for in excess of two years without giving rise to complaint. Regularisation of the planning status of how the site can

operate in terms of number of mixer trucks and permitted movements will enable this highly sustainable development, predicated on the supply of raw material by rail, to continue to service the demand from local construction projects.

The applicant, and ourselves, would of course be very happy to meet to discuss any element of the proposal in more detail. In the meantime, we trust that you have sufficient information in order to validate the application and look forward to confirmation of that. In the meantime, should you have any queries then please do not hesitate to get in contact.

Yours faithfully,



VILNA WALSH  
Director

Enc.

cc. Luke Smith - London Concrete