

**APPENDIX B: SUMMARY OF PUBLIC CONSULTATION RESPONSES**

	<b>SUMMARY OF PLANNING OBJECTIONS</b>	<b>OFFICER COMMENTS</b>
<b>No.</b>	<b>Principle of the Development</b>	
1	I am opposed to the building of a freight facility at such a short distance from the Terraces.	Planning permission exists for the development of a rail freight facility on this (and the wider Cricklewood Railway Yard) site by virtue of the s.73 Permission for the Brent Cross Cricklewood ('BXC') regeneration scheme. This outline planning permission is still capable of being implemented at this stage and therefore the principle of using this land as a rail freight facility has already been established.
2	The proposed temporary use, if granted, must not set a precedent for a future application to extend the site.	<p>The planning application proposes a temporary use of the northern part of the site as an aggregate rail freight facility. The application site falls within the BXC regeneration area which benefits from outline planning permission granted in July 2014. As stated in 1 above, this outline permission includes the delivery of a rail freight facility ('RFF') on this (and the wider Cricklewood Railway Yard) site. In view of the programme for delivery of the permitted BXC regeneration scheme, the applicant has proposed the use of the site for a temporary period so as to not undermine the comprehensive redevelopment of the BXC regeneration area through implementation of the outline planning consent. Therefore, any planning permission (if granted) would be for the proposed 18 month period and would be required (by condition) to cease after this period.</p> <p>Local residents and stakeholders will also be aware through a number of public exhibitions that the Council's Regeneration Team are progressing plans for the delivery of the abovementioned RFF on this site (and the wider Cricklewood Railway Yard site) as part of the BXC regeneration scheme. A planning application for this RFF was recently submitted to the Council and the acceptability of this proposal will be tested through the normal planning process.</p>
3	Unsuitable land use adjacent to a residential area.	As stated in 2 above, the application site falls within a wider site which benefits from outline planning permission for delivery of a RFF. As such, the use of the land as a RFF has already been established.
	<b>Amenity Impacts: Air Quality</b>	
4	The proposed development would have an unacceptable and damaging effect upon the already poor air quality in	The planning application is accompanied by an Environmental Statement which includes an assessment of air quality (Chapter 3) to determine whether the impacts of

	<p>this area.</p>	<p>the proposed development would be significantly adverse and, consequently, whether any mitigation measures are required to reduce any such impacts to acceptable levels. This includes an assessment of (inter alia) existing air quality, potential for wind-blown dust, impacts on human health, road traffic emissions, and impact on residential amenity (dust soiling).</p> <p>A further Dusk Risk Assessment document (June 2017) was provided in response to the Council's request for further information.</p> <p>Through the Council's consultation exercises, the assessment submitted by the applicant has been reviewed by the Council's Environmental Health Team who have provided responses (including recommended conditions) that have informed the Officer's planning appraisal and recommendation.</p>
5	<p>The development will generate unacceptable dust impacts upon the local residential area.</p> <p>Dust is already a problem in the local area.</p> <p>Wind-blown dust could impact upon allotments located between the Railway Terraces and the railway. No screening or protection has been proposed.</p>	<p>See response to 4 above.</p>
6	<p>If permission is granted, a roof over the facility should be provided to protect residents from dust.</p>	<p>Following the Council's request for further information in May 2017, the applicant sought to amend the proposal to address concerns relating to air quality. The amendment resulted in the provision of structures over the proposed aggregate stockpiles/bins.</p>
7	<p>Resulting air pollution will put residents' health at risk and will make the area impossible to live in (reference to asthma and other respiratory conditions are made).</p> <p>Stationary traffic along an already congested Cricklewood Lane would be detrimental to human health.</p>	<p>See response to 4 above.</p>
8	<p>Nitrogen dioxide levels in the area were recently monitored at 41.6 micrograms per cubic metre – the limit is 40 (Edgware Road is quoted in particular as breaching NO<sub>2</sub> limits).</p>	<p>The air quality assessment submitted as part of the Environmental Statement includes an assessment of Nitrogen Dioxide. As set out within the Officer's report, the Council consulted the Environmental Health department who have reviewed this assessment and raised no objections in regard to its conclusions regarding Nitrogen Dioxide emissions as a result of the proposed development.</p>

9	An increase in freight traffic is likely to have a negative impact on already poor air quality in the area.	See response to 4 above.
10	Any protections/mitigation provided must be guaranteed and subject to effective monitoring and enforcement.  The hours of operation must be reduced to limit pollution.	Any planning permission granted will be subject to a number of conditions, some of which will relate to the implementation of various mitigation measures to control the impact of the proposed development, including those relating to air quality and hours of operation. The applicant will be obliged to comply with all of the conditions attached to any planning permission and if any breach is identified, appropriate enforcement investigations will be undertaken by the Council's Planning Enforcement Team.
11	More dust, noise and pollution than its proposed predecessor (s.73 Permission) and less mitigation measures are intended (no acoustic screen and transfer station in the open).  Inadequate mitigation measures to safeguard nearby residents.	The proposed development is for an aggregate transfer facility which is intended to be operated for a period of 18 months. Whilst this is a different type of freight facility from that envisaged in the outline planning permission, it is not intended to be the final proposals for the freight facility as part of the BXC regeneration scheme. The applicant has therefore proposed mitigation measures commensurate with the type and scale of the freight facility proposed.  See response to 10 also.
12	Best Practice dust prevention can fail on open sites, therefore a covered site is the only solution (this will also aide noise reduction).  Substantial vegetation should also be established within the perimeter to help with dilution of pollution levels.	See response to 6 above.
13	Reference is made to the Mayor of London's recent statements and publications aimed at addressing London's air quality.	The proposed development will be considered against the relevant development plan policies including those contained within the London Plan, Barnet's Core Strategy and Development Management DPDs and adopted Supplementary Planning Documents.
<b>Amenity Impacts: Noise</b>		
14	The development will result in unacceptable noise impacts upon local residential areas (Railway Terraces and future occupants of the Fellows Square development).	The planning application is supported by an Environmental Statement which includes an assessment of noise (Chapter 4) to determine whether the impacts of the proposed development would be significantly adverse and, consequently, whether any mitigation measures are required to reduce any such impacts to acceptable levels. As part of this assessment, the applicant has identified various sensitive receptors in proximity to the application site (including Railway Terraces and North West Residential Development, as referred to within the assessment) and conducted their

		<p>assessment on that basis.</p> <p>Further information was provided in respect of this noise assessment in June 2017 in the form of an addendum to the Environmental Statement in response to the Council's request for further information (May 2017). This included an assessment of the effect of amendments to the proposed development, including the erection of structures over the aggregate stockpile bins which would create a barrier effect to noise.</p> <p>Through the Council's consultation exercises, the assessment and further information submitted by the applicant has been reviewed by the Council's Environmental Health Team who have provided responses (including recommended conditions) that have informed the Officer's planning appraisal and recommendation.</p>
15	<p>The acoustic barrier is trackside and may shield Brent Terrace but not the Railway Terraces residents.</p> <p>There should be an acoustic screen adjacent to the Railway Terraces properties.</p>	<p>The noise assessment provided within the Environmental Statement did not identify the need for additional noise mitigation measures in regard to residential properties within Railway Terraces.</p> <p>The conclusion of this assessment has been reviewed by the Council's Environmental Health Team, as stated in 14 above.</p>
16	<p>A number queries were raised in response to the Noise Assessment provided with the application (within the EIA):</p> <ul style="list-style-type: none"> <li>- Noise from the plant is very noisy and in reality the noise will be greater than that stated. If not, the penalties given are very low (only 3dB for intermittency has been applied, which is barely perceptible). A 6dB or 9dB penalty should be applied.</li> <li>- Noise sources given didn't identify reversing beepers, which are generally tonal and intermittent; no account taken of the use of the CAT shovel; a train moving off is not intermittent noise; and loading aggregate onto an 8-wheeler is continuous noise with no tonality, intermittency or impulsivity.</li> <li>- Assumptions made that Dorchester Court is the most affected dwelling. Greater consideration</li> </ul>	<p>See response to 14 above.</p>

	<p>should be given to no.39 Needham Terrace.</p> <ul style="list-style-type: none"> <li>- Further evidence is required to qualify the stated barrier effect of the buildings and perceptibility of impulsivity of noise.</li> <li>- No noise (or air quality) assessment provided for the generators to be provided in the welfare cabins.</li> <li>- The sound of aggregate being loaded from trains to HGV by grabber will create an impulsive noise impact.</li> </ul>	
17	<p>Based on the changes proposed compared to the existing (outline) planning permission, there will be increased noise from traffic over a longer duration due to the early start in the mornings.</p> <p>As a minimum, activities should be conducted under cover with suitable acoustic screens.</p>	<p>The rail freight facility envisaged in the BXC outline planning permission is for the provision of a transfer point for containerised and palletised goods operated over 24-hours/7 days a week. Whilst contained within a building, this rail freight facility had the potential to generate traffic (and any noise arising from it) at any point in the day/week.</p> <p>The applicant has amended the proposed development to incorporate the erection of structures over the proposed aggregate stockpile bins. This is principally to control the emission of dust arising from the movement of aggregate from train to stockpile and stockpile to HGV; however, the structures are also recognised as offering some noise reduction benefits. This amendment has been assessed by the applicant within the Further Information submitted in June 2017, including an addenda to Chapter 4 of the Environmental Statement.</p>
18	<p>The hours of operation (6am-6pm).</p> <p>The proposed operating hours (6am-6pm) must be accompanied by independently calculated and specified noise reduction measures – 6am is too early for noisy works.</p> <p>Inadequate provisions for noise reduction particularly given the suggested hours of operation.</p> <p>Hours of operation should be conditioned.</p>	<p>As per the above responses (14 and 17), the applicant has provided a noise assessment which has been reviewed by the Council’s Environmental Health Team.</p> <p>The impact of the proposed development on the amenity of local residents, including those relating to noise, is considered in the Officer’s report as an assessment against relevant development plan policies and other material considerations.</p> <p>The conclusion of that review is that the proposed development is likely to cause the greatest impact on the (future) occupants of the residential development to the northwest of the application site (a.k.a Fellows Square or ‘North West Residential Development (‘NWRD’)) compared to the noise limits set by Condition 42.1 of the BXC outline (s.73) planning permission. The residents at Brent Terrace and Railway Terraces would be affected to a lesser extent. As such, the Environmental Health</p>

		Officer has recommended that any permission granted should be subject to a condition limiting the hours of operation from 6:00am-6:00pm Monday-Friday and 6:00am-1:00pm Saturdays until such time as the NWRD is occupied by the first resident. From this point, it is recommended that the development be confined to the hours of 8:00am-6:00pm Monday-Friday and 8:00am-1:00pm Saturdays (no Sunday or Public Holiday working).
<b>Amenity Impacts: Vibration</b>		
19	Vibration from freight trains affects the Terraces. They (the trains) build resonance in the houses, particularly in the upper floors where the joists flex and TV/monitors bounce. Aggregate trains are worse so this application represents an increase in vibration impact over the container based application previously submitted.	<p>The Environmental Statement submitted with the planning application included an assessment relating to (noise and) vibration (Chapter 4). As aforementioned, this has been reviewed by the Council's Environmental Health Team who have provided comments in response to the consultation exercise.</p> <p>The impact of the proposed development on residential amenity, is considered in the Officer's report as an assessment against relevant development plan policies and other material considerations.</p>
<b>Amenity Impacts: Lighting</b>		
20	<p>Concern is raised about light pollution and the blocking of light.</p> <p>Efforts should be made to ensure whatever buildings are necessary are as light and discreet as possible to reflect light and mitigate shadows being cast over the Railway Terraces.</p>	<p>The impact of the proposed development on residential amenity, including the consideration of potential light spill, is considered in the Officer's report as an assessment against relevant development plan policies and other material considerations.</p> <p>The only structures proposed as part of this planning application are the structures to be erected over the aggregate stockpiles and the stockpile bins themselves. The application also includes the erection of a welfare cabin and security hut; however these are single storey and unlikely to be visible from outside the application site.</p>
21	<p>There will be considerable light pollution as the site will have 24-hour security and work will take place from 6am-6pm.</p> <p>This will be more noticeable during the winter months.</p>	See response to 20 above.
<b>Amenity Impacts: Visual Intrusion</b>		
22	The rail freight facility will be visible from residential	The impact of the proposed development on residential amenity, including

	properties and associated gardens within the Railway Terraces and therefore disruptive.	consideration of visual intrusion, is considered in the Officer's report as an assessment against relevant development plan policies and other material considerations.
<b>Traffic Impacts</b>		
23	<p>The Local Road (Edgware Road) already suffers from significant congestion issues and the network will not be able to cope with the uplift in vehicular trips required to service the development.</p> <p>In combination with the wider regeneration of the area (particularly the Waste Transfer Station) and other development along the A5, traffic levels resulting from this proposal (up to 16 per hour) would be unacceptable.</p>	<p>The planning application is supported by a Transport Assessment (EAS, February 2017) which assesses the impact of the trips to be generated by the proposed development (HGVs and car) against the baseline, which includes the regeneration scheme permitted by the BXC outline (s.73) planning permission, and what effect this has on the local highway network (including the A5 Edgware Road).</p> <p>As set out within the Officer's report, following the Further Information submitted in June 2017 and subsequent clarification provided by the applicant in July 2017, the Council's Transport and Regeneration Team raised no objections to the proposed development.</p>
24	Site access is located immediately opposite the Cricklewood Bus Garage. The addition of a significant number of additional large vehicle trips in this location will have significant traffic and safety upon the Edgware Road.	See response to 23 above.
25	The site layout details are insufficient as the tracking of arctic lorries appear to go through the wheel wash. Tracking should be provided for all vehicle types.	This matter was picked up by the Council's Transport and Regeneration Team who requested that the applicant provide further information to demonstrate that two opposing HGVs could
26	Increased vehicular traffic on Cricklewood Broadway and Elm Grove, which is often used as a shortcut by heavy lorries. This will decrease air quality, which is already poor in this area.	See response to 23 and 4 above.
27	<p>There is no apparent consideration of the intended increase in traffic that will affect the entire area.</p> <p>The transport assessment is inadequate for the purposes of the temporary permission for aggregate handling. It does not consider:</p> <ul style="list-style-type: none"> <li>- Number of vehicles expected to enter and exit the yard or usage of these vehicles; and</li> </ul>	See response to 23 above.

	<p>- It has been written in support of the new rail freight facility and does not relate to the usage of land for aggregate handling in the capacity that this planning application is requesting.</p>	
28	<p>Noise and traffic on the railway has increased immensely since 2000.</p>	<p>The planning application proposes that aggregate would be delivered to the site via three trains each week. These train movements would be in addition to the existing rail traffic utilising the Midland Mainline tracks. Any increases in rail traffic since 2000 is not attributable to the proposed development and would be governed by the statutory undertaker, Network Rail.</p>
<b>Lack of Consultation</b>		
29	<p>The developer did not engage in a pre-application consultation process.</p> <p>The developer has clearly showed contempt for residents as stated within the planning application:</p> <p><i>"Given the very specific detailed technical operations proposed onsite for the Rail Freight Facility to deal with the transportation by rail of aggregate it was decided not to engage with the public directly. It was considered that there would be no benefit to either DB Cargo or the general public from such a consultation."</i></p>	<p>There is no statutory requirement for developers to engage in pre-application consultations with members of the public, or indeed the Council. As set out in response 31 below, the Council are required to publicise the submission of a planning application and it has done so in respect of this application.</p>
30	<p>Work is currently being undertaken on this site, which should cease as no consultation with the public has been undertaken.</p>	<p>The Council is aware that some activity, including site clearance, has taken place prior to the determination of this planning application. The Planning Enforcement Team conducted an investigation into this after receiving complaints. Given that this planning application remains to be determined by the Council, whereby some of the activity appeared to relate to the proposals contained within it, it was not considered expedient to take any formal action at the time.</p>
31	<p>Further public consultation should be carried out before a decision is made.</p> <p>Closer engagement with residents is requested.</p>	<p>Upon registration of the planning application, the Council conducted consultation with a number of local residents (along with both statutory and non-statutory consultees). Following the receipt of Further Information pursuant to the EIA Regulations, the Council conducted further consultation with those who had made representations in response to the first round of consultation. Having now carried out a planning assessment, Officers are now in a position to make a recommendation on</p>

		the application and present this to Members of the Planning Committee for determination. The Council are not required to conduct further consultation before presenting the application to the Planning Committee.
32	Inadequate consultation of Railway Terraces residents and the Terraces appear to have been 'airbrushed' out of the environmental reports.	The Council conducted public consultation with those residents and occupants in the close vicinity of the application site. The properties collectively referred to as 'Railway Terraces' are located over 250 metres to the south of the application site and were therefore not included within this original consultation exercise. In a request for Further Information issued in May 2017, the Council requested clarification regarding the identification of 'sensitive receptors' in respect of the Noise and Vibration assessment provided within the Environmental Impact Assessment. This request was amongst a number of other matters requiring either further information or clarification.
<b>Variance of Development from s.73 Permission</b>		
33	The previous planning application has conditions such as keeping the waste covered, this application does not.	The proposed development is for the transfer of aggregate and would not involve the importation, storage or transfer of any waste. Furthermore, the rail freight facility envisaged in the s.73 Permission on this (and the wider) site was for the transfer of containerised and palletised goods.
34	Outline planning permission was granted years ago for the use of land for an enclosed freight transfer; however, this was not for the transfer of aggregates in the open.  The proposed development should be subject to the same controls set out in previous conditions (i.e. enclosed/roof over the site and acoustic barrier to the south of the site).	As referred to in responses 1 and 2 above, the application site falls within the BXC regeneration area which benefits from outline planning permission granted in July 2014 ('s.73 Permission'). This outline permission includes the delivery of a rail freight facility ('RFF') on this (and the wider Cricklewood Railway Yard) site. The RFF envisaged in the s.73 Permission was a transfer point for conventional freight that is generally on pallets or roll cages to be operated 24 hours/7 days a week. This outline consent includes the erection of a building with up to 29,300m <sup>2</sup> of floorspace.  The proposed development is for the operation of an aggregate transfer facility for a temporary period of 18 months in cognisance of the BXC regeneration scheme. It is hoped that the applicant can operate this temporary facility in the short term whilst the Council's Regeneration Team submit a planning application for the BXC RFF and the Local Planning Authority give due consideration to it. Therefore, this proposal is not the RFF that will be pursued as part of the BXC regeneration scheme.  Nevertheless, the proposed development will be subject to similar material planning considerations, including the impact of noise and dust emissions. As stated in

		response 17, the applicant has amended the proposed development to now incorporate the erection of structures over the stockpile bins to ameliorate noise and air quality impacts. The acceptability of the proposed development in this regard is considered within the Officer's report.
35	The proposed use may be an impermissible variation of the previous planning permission for the site connected with the BXC scheme.	The outline planning permission granted by the s.73 Permission remains extant and capable of implementation. This application does not seek to vary that existing permission but is instead a separate planning application seeking full permission (albeit for a temporary period of time). No mechanism or other control exists within planning law to prevent further planning applications being submitted to the Council for development of the same site.
36	Some years ago, it was agreed that there would be an enclosed freight station with access to and from the north, and the Terraces would be protected by an acoustic screen. I am shocked to hear that the development is to be much larger – extending south and nearer to the Terraces.	In terms of vehicular access, the outline planning permission envisaged access to new RFF is off the A5 Edgware Road in a location that generally coincides with the existing access point (albeit altered to provide a separate entrance and exit point). In respect of how trains would access the site, the applicant has stated that trains would enter from the north off the Hendon (bi-directional) line and the loco would then do a loop to propel wagons into the site. The train would then split between the two sidings. On exit, the loco would pull the first set of empty wagons from one siding and then couple with the second set using the 400 metre headshunt before re-joining the main line.  This planning application proposes the use of part of Cricklewood Railway Yard (i.e. the area at the northern extent, which is furthest from Railway Terraces) as an aggregate transfer facility. The area between the application site and the properties within Railway Terraces does not form part of the proposed development.
<b>Monitoring and Enforcement</b>		
37	Full, on-going and meaningful consultation with the residents of the Terraces is required; along with a clear and agreed enforcement procedure must be established to ensure compliance.	In terms of the planning process, the Council have carried out their statutory obligations in terms of notifying and consulting local residents as well as the relevant statutory and non-statutory organisations. Any planning permission granted is likely to be subject to a number of conditions which the applicant must comply with. If a breach of any of those planning conditions are found, the Council will (via the Planning Enforcement Team) investigate the breach and determine the appropriate course of action (if necessary).  The applicant has also provided a management plan (submitted in June 2017 along

		with other Further Information) which details methods of engagement with local residents including a twice yearly meeting on site to discuss any concerns and provides contact details for the Site Supervisor, Project Manager and Project Supervisor. Furthermore, the applicant has proposed to monitor air quality and supply the data to the Council.
38	Previous complaints have been made to the Council about noisy works on the railway at night and were informed that the Council had no control over this. How could you control the open aggregate facility.	Works on the railway are outside of the Council's control as these are undertaken by the statutory railway undertaker, Network Rail, and other licenced Train Operating Companies or Freight Operating Companies who are permitted to use and undertake works to the railway under regulations outside of planning control.
39	Permanent 24-hour independent and automatic dust and noise monitoring must be instigated to ensure long-term compliance.	The applicant has proposed a number of noise and dust mitigation measures including the use of a dust suppression system facilitated by a number of 'rainguns' around the site which would dampen down aggregate stockpiles and the wider site. The applicant has also proposed the use of a wheel wash to prevent dust from being tracked off site by HGVs. In terms of noise, the applicant has proposed the erection of acoustic fencing and structures over aggregate stockpiles to mitigate noise and dust emissions.  The Environmental Health Team have reviewed these proposed dust/air quality and noise management measures as part of the Council's consideration of this planning application. If planning permission is granted, it is likely that these mitigation measures will be the subject of planning conditions to control the development.
40	Mitigation practices should be regularly audited at the applicant's expense and by a person employed by the Council.	The monitoring of conditions (including mitigation measures) will be the responsibility of the Council. If any breach of a condition is discovered, the Planning Enforcement Team will conduct an investigation and determine what action is appropriate (if any) to regularise the development.
<b>Adequacy of the Environmental Impact Assessment (EIA)</b>		
41	The environmental impact study is inadequate/insufficient for this type of noise, hours of work, level of pollution, etc.	The technical assessments contained within the EIA have been reviewed by relevant experts through the Council's consultation exercise(s) in consideration of this planning application. Further information and other points of clarification were requested in May 2017 and the applicant submitted the request information for further consideration (and consultation with relevant experts) in June 2017.
42	The application states that no environmental mitigation is necessary because (1) the railway bank will shield houses from noise and (2) the prevailing wind from the SW will	The EIA submitted in support of this planning application includes an assessment relating to noise (and vibration) (Chapter 4) which identifies the sensitive receptors

	blow dust north east, away from the Terraces. However, upper floors of properties at the northern end of the Terraces are immediately adjacent to and on the same level as the southern end of the site (Cricklewood Railway Yard); and there are many days when winds are not from the south west, or when there is little wind at all, and dust will settle close to where it is created.	considered within that assessment.  This assessment, including the appropriateness of the sensitive receptors identified, has been reviewed by the Council's Environmental Health Team. This review has in turn informed the Officer's assessment of the proposed development and the recommendation to the Planning Committee.
43	No technical research on noise, biodiversity and air quality has been done beyond the project's own Phase 1A and Phase 1B borders.	The applicant's EIA has been carried out in a manner proportionate to the proposed development and, as guidance dictates, is only required to consider impacts that are likely to be significant. The EIA does include a chapter relating to cumulative impacts (Chapter 8) which considers existing and other committed developments that might add to or compound the impacts associated with the proposed development.
<b>Impact on Heritage Assets</b>		
44	Insufficient consideration and mitigation on the effects (of the proposal) on the Terraces, which is designated as a Conservation Area (floodlighting, noise and dust).	The considerations of archaeological and cultural heritage assets, including the Cricklewood Railway Terraces Conservation Area, was scoped out of the applicant's EIA for reasons relating to the visibility of the proposed development from the Conservation Area and that any impact on its setting would be negligible (see Appendix 1.1 to Chapter 1 of the EIA).  The Officer's report considers the impact of the proposed development on this particular designated heritage asset.
45	The proposal does not seem to address the impact on the Railway Terraces Conservation Area. In reference to the Conservation Area Appraisal and policy on Conservation Areas, the proposed development goes against the requirement to preserve and enhance.	See response to 44 above.
46	The proposed development will cause unacceptable harm to the green communal amenity spaces unique to this Conservation Area through increased traffic and dust.	See responses 4-13 above in regard to Amenity Impacts: Air Quality.
<b>Other</b>		
47	The development will reduce the quality of life for residents in the local area.	See responses 4-22 above in regard to various amenity impacts that might affect quality of life.

48	The temporary aggregate transfer facility should not be allowed without the same constraints as have been established within the Brent Cross Regeneration Proposals.	See response 11 above.
49	The application describes a temporary use for a period of 18-months but in fact appears to be Phase 1 of a larger scale operation that will encroach further onto the Railway Terraces.	See response 2 above.
50	Adverse impact of the proposed development on the allotments to the south of the site (and ability to grow fruit and vegetables); along with the impact on the wildlife (number of amphibians and birds) that have inhabited this area from dust pollution.	<p>The EIA submitted in support of the planning application assesses the impact of the proposed development on ecological receptors (Chapter 6), including a number of protected amphibian and bird species. The assessment noted in particular the lack of connectivity between the site and surrounding areas due to the rail infrastructure constraining the site.</p> <p>In terms of the potential for impacts off-site as a result of dust emissions, please see earlier responses 4-13 above in regard to the assessment and mitigation of air quality.</p>
51	<p>The allotments are considerably valuable in terms of recreational and health and well-being opportunities which will be blighted by the proposed development.</p> <p>There is also a contamination risk to the soil from the airborne pollutants and dust.</p>	<p>See response 50 above and also responses 4-13 regarding air quality.</p> <p>In terms of contamination risk, the EIA includes a Site Investigation report (Appendix 1.2 to Chapter 1) which includes an appraisal of ground conditions, and a further Drainage Strategy was submitted in June 2017. The latter of these assesses the potential for foul and surface water run-off from the site and consequently advises the need for various mitigation measures. These are considered in the Officer's report as part of the Council's consideration of this planning application.</p>