

APPENDIX D: SUMMARY OF PUBLIC REPRESENTATIONS

Table 1: Summary of Public Representations – Consultation 1 (3 November to 1 December 2018)

Please note, this table provides a summary of the comments received throughout the different public consultations carried out by the LPA on this application, and is not intended to be a full transcript of those comments. A short officer response is provided, however these are not intended to be a comprehensive assessment of the issues and should be read in conjunction with the rest of the committee report where the full appraisal of the material planning considerations and policy assessment is set out.

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PRINCIPLE OF DEVELOPMENT		
Principle of Development – General Comments		
1.	The value of the surrounding properties will be decreased due to the WTF and cause further detriment to those who have just recently purchased homes.	The effect of development on property values is not a matter material to the LPA’s consideration of this planning application. The construction of a Waste Handling Facility (WHF) which would be larger than the Waste Transfer Station proposed under this application, has already been approved as part of the outline planning permission for Brent Cross Cricklewood (BXC). Overall the regeneration scheme will deliver a new town centre, expanded shopping centre, replacement bus station and new train station, amongst numerous other infrastructure provisions, improvements and new community facilities. The benefits of this regeneration scheme will extend beyond the area of the development and beyond Barnet Council’s administrative boundary. All of these benefits are considered to positively increase the liveability of the area.
2.	Further information is requested as to why the proposed development does not use rail to transport the waste like the Hendon Waste Transfer Station that it is replacing, instead of HGVs.	Since the S73 Permission was granted for the BXC regeneration, waste management needs of the North London Waste Authority (as the statutory waste disposal authority, owners of the existing Hendon Waste Transfer Station and future operators of the proposed WTS) have changed. As set out within the planning application, the applicant has explained the reasons for this change and thus the alternative requirements for a replacement waste facility. In summary, this has come about following the decision by the NLWA to consolidate operations at Edmonton Eco-Park, including the provision of a new energy recovery facility, resulting in a significant reduction in the scale, nature and capacity of any replacement WTS. Furthermore, the London Plan now requires all of London’s waste to be managed within London rather than being transported by rail to landfill or

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		processing sites outside of London. A rail-linked facility is therefore no longer required.
Principle of Development – Location		
3.	<p>The location for the proposed WTS is not appropriate in a built up residential area.</p> <p>The proposed developed is within close proximity to an infant school and nursery and therefore an unsuitable land use for that site. Residents highlighted concern with children playing in nearby school grounds and playgrounds in relation to noise and air pollution.</p> <p>The site should not be located directly next to a new residential development (Fellow Residential Development).</p> <p>The proposed development is located too close to the Railway cottages / Terraces where young families live.</p> <p>The proposed development should be located further away from Brent Cross Regeneration Area and associated residential area in an appropriate industrial land use location.</p> <p>Further information is needed on how this will be mitigated.</p>	<p>The application site (and adjacent land occupied by Bestway Cash & Carry) already benefits from outline planning consent to construct a waste handling facility as part of the Section 73 Planning Permission granted for the Brent Cross Cricklewood regeneration scheme in July 2014. The principle of development has therefore been established and is considered as being acceptable in planning terms.</p> <p>Whilst there are residential neighbourhoods to the west of the A5 (Edgware Road), the site is occupied by an existing builders merchants, is adjacent to a cash and carry warehouse with a retail park to the north and there are other builders depots and light industrial uses to the west.</p> <p>The application is accompanied by an Environmental Statement which is the outcome of the Environmental Impact Assessment (EIA) process which includes an assessment of the impacts of the development on sensitive receptors, such as nearby housing, and sets out the required mitigation measures. Taking into account the design of the proposed development and mitigation measures to be implemented (including an odour abatement system and fast-acting roller shutter doors), the conclusions of the EIA and the advice of technical advisors, the proposed development is considered to be acceptable.</p> <p>The proposed waste transfer station would also be subject to other consenting regimes relating to environmental impacts. Specifically, the applicant will be required to apply for and obtain an Environmental Permit from the Environment Agency.</p>
4.	<p>The location of the WTF next to the infant school will increase the risk of children being hit and injured on their way to and from school.</p>	<p>The proposed development includes the signalization of the existing junction between Geron Way and the A5 Edgware Road. As well as vehicular access and safety, this will improve the junction for pedestrians and cyclists and make crossing the A5 in this location easier and safer. The proposed development will result in fewer vehicle trips compared to the exiting Selco builders merchants and compared to the S73 Permission for the WHF. All HGV movements associated with the WTS will be directed along the A5 Edgware Road other than any refuse collection vehicles collecting waste from residential streets. The proposal is not considered to increase the risk of accident to children or pedestrians.</p>

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5.	<p>The following alternative locations were proposed in replacement of the current site:</p> <ul style="list-style-type: none"> - Staples' Corner - The site on Tilling Road - Allotment adjacent to Hendon Way 	<p>Please see Officer Response in Row 3 and subsequent rows regarding the established principle of developing a waste management facility at this location.</p> <p>Assessment of the suitability of this site, and any alternatives, was considered as part of the original outline planning application which was approved in 2010.</p> <p>Staples Corner Retail Park is outside the application boundary for the S73 Permission.</p> <p>Sites along Tilling Road are within the S73 Permission but are identified as the location for the new town centre, housing and office development as part of the approved masterplan for BXC.</p> <p>The allotments adjacent to Hendon Way are not within the boundary of the S73 Permission and planning policies seek their protection.</p>
Principle of Development - Land Use		
6.	<p>The site is too small for the proposed development.</p>	<p>As set out in the Officer's Response in Row 3, the waste transfer station proposed within this 'drop-in' application seeks to respond to a change in strategic waste management needs since the original 2010 outline and subsequent 2014 S73 planning permissions were granted. As a result, less land is required compared to that identified within the outline planning applications (i.e. only the land occupied by the Selco builders merchant is needed) to deliver a waste transfer station that would bulk up residual wastes for onward transfer to treatment facilities (i.e. the energy from waste facility at Edmonton Eco-park). The proposed facility has been designed in conjunction with and to meet the requirements of the North London Waste Authority. These requirements can be adequately accommodated on the site.</p>
7.	<p>There is concern that there are already too many Waste Transfer stations in the area and there is not a need for another one.</p>	<p>The principal of replacing the existing waste management capacity at Hendon WTS was established at the outline planning stage. The planning permission for the BXC development approves the provision of a new waste facility to replace the existing Hendon Waste Transfer Station (HWTS) on the eastern side of the Midland mainline. This will allow the existing HWTS site to be redeveloped to facilitate delivery of the new train station and associated BXC development. The NLWA are the statutory waste disposal authority for seven North London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest – who have a strategic overview of waste management needs across these boroughs. The NLWA have confirmed in their consultation response that The Geron Way facility is required as a strategic facility to receive a range of waste streams</p>

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		collected by the North London boroughs. The location is important to serve the boroughs in the west of the Authority's area and would reduce the environmental impacts and cost of transporting waste. The primary users of the facility will be Barnet and Camden Councils, although from time to time other boroughs may be directed to deliver waste to this facility.
8.	The development will result in a high fire risk especially with petrol stations in close proximity. Further information is requested on how this has been appropriately mitigated.	The proposed development has been designed based on the latest Fire Prevention guidance compiled by the Environment Agency. The LPA have consulted the Environment Agency and also the London Fire Brigade to establish their views on the proposed development and whether they consider it to be appropriate in terms of fire prevention and management. As set out in Section 7 of the Committee Report, both organisations have no objections to the application. Beyond the planning process, operation of the proposed development would also require an Environmental Permit from the Environment Agency, an integral part of which will be a Fire Prevention Plan.
Principle of Development - Community		
9.	The liveability of the area will decrease as a result of this development proposal due to increased traffic and increased dust and noise emissions.	<p>The proposed development forms an integral part of the wider, permitted BXC regeneration scheme and is necessary to replace the existing Hendon WTS to facilitate delivery of the new Thameslink Train Station. The BXC regeneration scheme will provide key connections between over the Midland mainline railway and A5 Edgware Road connecting the existing communities to the west to the wider regeneration area and the benefits that would derive from this. The BXC regeneration scheme as a whole will include an extended shopping centre, a new town centre, market square - including 841,615 sq ft of retail space, 7,500 homes, 27,000 jobs, three re-built schools, new parks and community facilities, riverside park as well as new public transport routes. The proposed Waste Transfer Station is therefore a key piece of infrastructure necessary to facilitate delivery of the BXC masterplan.</p> <p>See Officer Response in Row 16 in relation to air quality.</p>
10.	<p>The area will economically suffer due to the proposed development deterring people from visiting and shopping in the area as a result from more traffic and pollution.</p> <p>Local businesses will be determinately impacted as a result of this development. This will be as a result of increased HGVs and the noise/smell of the WTS discouraging people from coming to the area.</p>	<p>The proposed development for a replacement Waste Transfer Station forms part of the wider BXC regeneration scheme. As set out in the Officers Response in Rows 1 and 9, the regeneration scheme as a whole will deliver an extended shopping centre, new town centre, up to 27,000 jobs, 7,500 homes along with new public open and green spaces, schools, and transport infrastructure improvements including access to public transport. The wider BXC regeneration scheme will therefore improve the wider area and access to retail opportunities, community facilities and new jobs whilst improving the local highway network and access to non-car modes of transport. In terms of odour and transport impacts of the proposed WTS, the application is supported by an</p>

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		Environmental Statement and a number of technical assessments including an Air Quality and Odour Assessment Report (dated July 2017) and Transport Report (September 2017 along with Transport Report Addendum July 2018 and Transport Report Supplementary Addendum August 2018), both of which assess the impact of the proposed development and identify, where necessary, appropriate mitigation measures. Furthermore, matters such as odour control will also be subject to further consenting processes and controls through the Environmental Permitting process from the Environment Agency before being allowed to operate.
11.	Residents raised overall general concern for the health and safety of the young children who live and attend local schools` in the area. Comments were made to children walking, scooting, cycling in the area being in increased danger if the proposal is approved.	See Officer Response in Row 4 .
12.	The appeal of the area will significantly decline with an increase in rubbish, dirt and dust as a result of the operation of the WTS.	See Officer Response in Rows 3 and 10 . The application is accompanied by an Environmental Statement that addresses the impact and mitigation of the of the proposed development which is considered to be acceptable. Further detail on the technical operation within the facility is provided at section 5 of the report. The nature of the material being handled does not result in excessive dust or dirt and the facility is fully enclosed. Notwithstanding this, conditions are recommended to secure a site management plan for the facility.
13.	There has been effort to improve the living standards of the neighbourhoods. This proposal would go against this.	See Officer Response in Rows 1 and 9 relating to the proposed development forming part of the wider BXC regeneration scheme, which has outline planning consent, and the benefits that would be derived from this redevelopment in terms of regenerating the wider area.
Principle of Development - Overall Regeneration Scheme		
14.	The development proposal is not a positive regeneration option. The proposed development is in direct contradiction with the regeneration of the area.	See Officer Response in Rows 1 and 9 relating to the proposed development forming part of the wider BXC regeneration scheme, which has outline planning consent, and the benefits that would be derived from this redevelopment in terms of regenerating the wider area. The proposed development is necessary to deliver a replacement waste transfer station to unlock land to the east of the Midland mainline railway for delivery of the new Thameslink train station and associated BXC development.
15.	The proposed development will have detrimental impact on the overall regeneration of the area and the Fellow Square residential development.	See Officer Response in Rows 1, 9 and 14 . In terms of the impact of the proposed development on residents of the adjacent Fellows Square development (and other sensitive receptors in the vicinity of the application site), the planning application is supported by an Environmental Statement and relevant technical reports which

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		consider matters relating to noise, air quality and odour. These assessments have been considered by the LPA and their appropriate technical advisers and the proposed design of the development and the mitigation measures included, are not considered to be acceptable.
AMENITY IMPACTS		
Amenity Impacts: Air Quality – General Comments		
16.	<p>Residents are concerned about the potential increase of air and noise pollution as a result of the extra traffic the development proposal will cause.</p> <p>There is concern that the development will result in reducing the air quality within the surrounding area.</p> <p>The proposed development will add extra pollutants to the area and reverse the years of reducing impacts.</p> <p>On some occasions it has exceeded certain limits on PM2.5/NO2/PM10.</p>	<p>The planning application is supported by an Air Quality and Odour Assessment Report (July 2018). As part of the LPA's consideration of the planning application, these technical assessments and other supporting documentation are reviewed by relevant technical advisers – in the case of air quality and odour this information is reviewed by the Council's Scientific Services/Environmental Health Officer.</p> <p>The submitted assessments take into account air quality impacts arising from any increase in HGV and other traffic associated with the wider BXC development, as well as operation of the proposed waste transfer station itself. This includes consideration of levels of NO₂ and PM₁₀ emissions, fugitive dust during both the construction (short-term impacts) and operational (long-term impacts) phases of the proposed development, and odour emissions having regard to human health, amenity and potential for dust soiling effects. All HGVs using the new facility will be of the highest environmental efficiency rating complying with the Euro VI emission standard.</p> <p>For noise impacts, please see Officer Response in Row 33 and 34.</p>
17.	<p>The Our Lady of Grace Infant and Nursery School was recently highlighted by The Guardian as being in an area with air pollution levels that threaten child health and almost exceed EU legal limits of nitrogen dioxide (See Feb 2017 article Revealed: Thousands of children at London schools breathe toxic air).</p>	<p>The Our Lady of Grace Infant and Nursery School was identified as a specific sensitive receptor and assessed in a revised/updated air quality and odour assessment provided by the applicant. The impact of the proposed development on the school was therefore included within the Air Quality and Odour Assessment Report (July 2018). The submitted information has been reviewed by the Council's Environmental Health Officer who is content that the air quality impacts of the proposed WTS alone are largely negligible and is satisfied that the proposed development would be air quality neutral. Conditions are recommended to ensure that HGVs using the site are EuroVI compliant and also limit the number of HGV movements during the evening peak period.</p> <p>Also see Officer Response in Row 16.</p>
18.	<p>Air pollution should be measured within the surrounding areas incorporating the pollution from the North Circular, M1 and the</p>	<p>The submitted Air Quality and Odour Assessment Report (July 2018) seeks to establish an appropriate baseline upon which to formulate the assessment and therefore derive the impacts of</p>

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	<p>proposed increase of local traffic. This documentation should be made public.</p>	<p>the proposed development. As set out within Section 4 of the report, the baseline conditions are established using existing air quality data from automatic monitoring equipment located at Tally Ho Corner and Chalgrave School; and 15 diffuse tube monitoring locations in proximity to the application site – the closest three being at Hendon Way, Tilling Road and Cricklewood Lane. This data is supplemented by the data held by DEFRA and the applicant's own on-site monitoring, which included locations at Geron Way, Edgware Road (near the MS Office), Needham Terrace, Brent Terrace, Oxgate Gardens and Millennium Park. As documents submitted in support of a planning application, these reports are available for the public to view on the Council's Public Access website. A link to this website was provided in the LPA's neighbour notification letters, site notice and newspaper advertisement.</p>
<p>19.</p>	<p>The Air Quality report for this development says: "the area is considered to be of High sensitivity to dust soiling effects" with a medium "dust emission magnitude" for the short term construction. Yet they base their long term impact upon air quality on a receptor at West Hendon Broadway. This is too far away from the proposed location in NW2 to form a valid or reliable estimate of predicted NO2 Concentrations. Therefore section 6.2 of the report is not a valid indicator of the risk to the health of the residents. The conclusions are therefore invalid.</p>	<p>As aforementioned, the Air Quality and Odour Assessment Report (September 2017) submitted in support of the planning application in September 2017 sought to assess the impact of the proposed development and identify any necessary mitigation measures. The Council's Environmental Health Officer's review of that assessment similarly concluded that the applicant's identified receptors were not entirely adequate to assess the impact of the proposed development. In response to the Environmental Health Officer's consultation response, the applicant has provided a further, revised assessment taking into account the nearest sensitive receptors as advised by the Environmental Health Officer. This revised assessment is contained within the supplemental Air Quality and Odour Assessment Report (July 2018).</p>
<p>20.</p>	<p>The proposed development is not in keeping with Chapter 5.2 of the London Plan on Minimising Carbon Dioxide Emissions states (please review it). Given the increased pollution & threats to health - to approve this site would be incompatible with the human rights duties that are placed upon the council as a public authority under The Human Rights Act.</p>	<p>See Officer Response in Rows 16-19 in respect of how impacts of pollution and human health have been assessed by the applicant.</p> <p>In addition, the planning application is also accompanied by an 'Energy Statement and Low Zero Carbon Technology Feasibility Report' (dated September 2017), which addresses both energy consumption and carbon emissions from the proposed waste transfer station building. This concludes that the proposed building design achieves a 35% reduction on current Building Regulations carbon emission standards. HGVs using the site will also be Euro VI engine standard which is currently the lowest emission rating. The proposed development has been assessed against relevant development plan policies, including Policy 5.2 of the London Plan (2016), as part of the LPA's consideration of the planning application.</p>
<p>21.</p>	<p>The development application does not align with the Mayor of London's warning on London's soaring levels of air pollution. Further information is requested on how the proposed development is in alignment with the</p>	<p>See Officer Responses in Rows 16-20. Also refer to Section 9 of the committee report.</p>

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	<p>London Mayors focus on reducing air pollution. https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality</p>	
22.	<p>The proposed development contradicts Barnet council's commitments to improve air quality. "reduce the impact from transport and improve air quality" as set out in the London Borough of Barnet Air Quality Action Plan 2017-2022</p>	<p>As referred to above, the planning application is accompanied by an Air Quality and Odour Assessment Report (original version dated October 2017 with a revised version submitted for consideration dated July 2018) to consider these impacts and what mitigation would be necessary to ensure that any such impacts are not significantly adverse. The submitted information has been reviewed by the Council's Environmental Health Officer who is content that the air quality impacts of the proposed WTS alone are largely negligible and is satisfied that the proposed development would be air quality neutral. However, although identified as a worst-case scenario, it is recommended that further mitigation in line with the Council's Air Quality Action Plan is secured to reduce the potential for any adverse impacts as a result of the cumulative impact of the proposed development with the wider BXC development. This includes a condition requiring all HGVs to be Euro VI compliant and the installation of a camera system to check vehicles entering the site. The Council's Environmental Health Officer has also identified that the proposed development would result in the movement of HGVs during the most congested period of the day (17:00-19:00 Mondays to Fridays), which is likely to cause the greatest potential for traffic-borne emissions. A condition is recommended to restrict the number of HGV movements during this time period so that no more than one HGV enters or exits the site during 17:00-18:00 and no more than one HGV enters or exits the site during 18:00-19:00 on Mondays to Fridays (including the Bank Holiday days).</p>
Amenity Impacts: Air Quality - Health Risks		
23.	<p>Resulting air pollution will put residents and the children of our Lady of Grace Infant School's health at risk.</p> <p>Dollis Hill and Cricklewood Lane were frequently mentioned by submitters.</p>	<p>Please see Officer Responses in Rows 16-19, 22 and 30 and, in particular, Row 17.</p>
24.	<p>Further information is requested on what health related consultation has gone into the polluting effects of the proposed waste transfer station.</p>	<p>The planning application is supported by an Air Quality and Odour Assessment Report (July 2018) as part of the Environmental Impact Assessment carried out for the development. As part of the LPA's consideration of the planning application, these technical assessments and other supporting documentation are reviewed by relevant technical advisers – in the case of air quality and odour this information is reviewed by the Council's Scientific Services/Environmental Health Officer. The information has been available to members of the public through the statutory consultation on the</p>

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		application in October/November 2017 and subsequent consultation on additional information in July/August 2018.
Amenity Impacts: Air Quality – Odour		
25.	The odour smell generated from the site will be unbearable for the residents in the area.	Please see Officer Responses in Rows 16-18 above. An Air Quality and Odour Assessment Report has been submitted with the planning application. This includes an assessment of the impact of the proposed development in respect of odour emissions on the nearest sensitive receptors, which includes residential properties. It also identifies the mitigation measures incorporated within the proposed development in addition to operational measures and the effects this has in terms of controlling such emissions. This includes, but is not limited to: the provision of an Odour Control Unit that will filter the air from within the building to reduce odour concentrations before being expelled from the building; and fast acting roller shutter doors that minimise the amount of time they are open to purely allow vehicles to enter and exit the building. In terms of operation, waste is expected to be received in the building and transferred onwards within 12 hours. The Environment Agency do not allow waste to be held on site longer than 3 days as an exceptional circumstance.
26.	The smell from the WTF during increased heat during summer months would reach the surrounding residential areas creating an unpleasant living situation as well as affecting public spaces such as Gladstone Park.	See Officer Response in Row 25 .
27.	Further information is requested on how the smell and toxins from a Waste transfer Station are proposed to be mitigated to ensure that the surrounding residents receive no adverse negative impacts.	See Officer Response in Row 25 .
Amenity Impacts: Air Quality - Dust		
28.	There is concern to the impact of the HGVs will cause by leaving dust and dirt on the residential homes as they pass.	See Officer Responses in Rows 29 and 16-19 .
29.	Residents are concerned with the increased dust pollution caused by the proposed development. Concerns have been raised surrounding HGVs impact on Brent including noise, dust and dirt (within Dollis Hill Area especially)	The planning application is accompanied by an Air Quality and Odour Assessment (July 2018) which includes a risk assessment regarding the potential impact of fugitive dust and PM10 emissions on local receptors during the demolition and construction of the proposed development. It is stated that the on-site activities during the operation of the proposed facility are not expected to generate significant dust or PM10 emissions and thus the impact is concluded as negligible. Impacts arising from road-based emissions (including PM10s) are considered separately within the abovementioned assessment. As aforementioned, this assessment has been reviewed by the Council's Environmental Health Officer who has not raised concern with the applicant's approach

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		<p>to assessing the impacts of dust during the demolition and construction phase only. Section 9 of the committee report considers the effect of potential dust emissions in relation to relevant development plan policies including the necessity of any appropriate planning conditions relating to whether any impacts can reasonably be mitigated against through operational controls. Some of these mitigation measures have been put forward by the applicant in the abovementioned report and will be considered by the LPA.</p> <p>See also Officer Responses in Rows 16-19.</p>
30.	Dust generated from the facility during its construction and ongoing operation will impact the liveability of the area.	See Officer Response in Rows 39 and 16-19 .
31.	Concerns raised regarding the mitigation and management of odour and dust generated by the facility during construction and operation.	See Officer Response in Rows 39 and 16-19 .
32.	Dust monitoring and management plans are to be made available to the public.	<p>The planning application is accompanied by an Air Quality and Odour Assessment Report (July 2018) which recommends mitigation measures either embedded within the proposed development or to be implemented during the construction and/or operational phases of the development. The appropriateness of these mitigation measures, plus consideration of any additional measures, have been considered by the LPA in consultation with the Council's Environmental Health Officer. As a result of that consideration, and as set out within the Officer's Report, a number of conditions are recommended including measures to ensure the adequate control and mitigation of dust emissions from the development.</p>
Amenity Impacts: Noise		
33.	<p>The noise impact of the operation of the site has been raised as a major concern for local residents. This also includes the trucks on the associated roads who will be accessing the site during operational hours.</p> <p>The area is already impacted from industrial noise and any further industrial noise will impact on the liveability of the area.</p>	<p>The proposed development would be carried out predominantly within the WTS building, which would be constructed with a 5.5-metre-high concrete wall containing the operation, and include the provision of acoustic fencing along the eastern, southern and part of the southwest boundaries of the site. The planning application is accompanied by a Noise Impact Assessment (and subsequent Revised Noise Impact Assessment, July 2018) which assesses the impact of the proposed development in terms of noise emissions considering the nearest sensitive receptors. The assessment concludes that the proposed development would result in achieving or bettering the 5dB below background levels restriction at all modelled receptors, which is further improved through the implementation of the proposed 3.6-metre-high acoustic fencing along the southern and part of the southwest boundary of the Site, and 2-metre-high acoustic fencing along the eastern boundary of the Site. In line with national Planning Practice Guidance and Noise Policy Statement England</p>

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		(2010), the assessment therefore concludes that the proposed development would achieve either a No Adverse Effect Level (NAOEL) or be below a Low Adverse Effect Level (LAOEL), the latter of which is considered to be the level above which adverse effects on health and quality can be detected. As such, the proposed development could give rise to noticeable noise but this is not likely to be intrusive.
PARKS AND OPEN SPACES		
34.	The development proposal will have a determinately negative affect on the aesthetics and oasis of Gladstone Park.	The is located over 900m from Gladstone Park and is not within line of sight of the park. HGVs transporting waste from the site will not be using any residential streets for the transportation of the waste and will use the A5(Edgware Road) to connect to the A406 and wider strategic road network. This will be controlled by planning condition. Responses above have explained how odour and noise will be controlled. It is considered that the development will not impact on the aesthetics or usability and attractiveness otherwise of Gladstone Park.
35.	The development proposal doesn't appear to have any plans to add green space.	The proposed facility will comprise a waste transfer station where recycling, food and household waste will be collected, bulked-up and transferred to other processing centres. The wider BXC regeneration will deliver improvements to existing parks and green spaces including Claremont Park and Clitterhouse Playing Fields, as well as delivering new parks and public open spaces such as the Brent Terrace Linear Park, Eastern Park, Market Square and Station Square. The construction of the WTS will enable the delivery of the wider regeneration plan as envisioned under the S73 Permission.
PUBLIC ENGAGEMENT		
36.	Concerns that not all residents have been appropriately consulted throughout the process and that some residents did not receive the latest correspondence regarding the WTF.	The applicant has submitted a Consultation Statement with the application prepared by GL Hearn (Dated August 2017) which sets out the programme of public consultation and engagement that has been carried out in support of the proposals for the Brent Cross Thameslink project at the pre-application stage. Statutory consultation on the planning application has been carried out by the LPA in accordance with the Town and Country Planning (Development Management Procedure) Order 2010 in both October-November 2017 and July-August 2018. This is detailed in Section 7 of this committee report.
37.	There is concern that resident's voices are not being listened to.	All comments raised during the consultation events were captured in the Consultation Statement provided above. All comments provided to the LPA through the statutory consultation periods have been captured in this part of the Committee report and appropriately responded to all submissions.
ENVIRONMENT		

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38.	<p>The development proposal will cause significant environmental harm to the area.</p> <p>General concern regarding the environmental and ecosystem impacts were raised. Especially around how the development proposal will add distress to the environment and wildlife (especially through increase of traffic on the roads).</p> <p>The development should incorporate green infrastructure such as 'green walls' or trees to help reduce the air pollution from the proposed development.</p>	<p>See Officer Response in Rows 39 and 16-19.</p> <p>The proposed development has been subject of an Environmental Impact Assessment (EIA) which includes an assessment of the impacts of the development on sensitive receptors. The Environmental Statement submitted with the application has been reviewed by the Council's technical specialists including Environmental Health officers.</p> <p>The application site comprises an existing warehouse, hardstanding car park area and service bay with limited trees of low quality along the verge of the A5(Edgware Road). The site is not located within any sensitive area (i.e. designated landscapes) or site of importance to nature conservation.</p> <p>The proposed building will include an area of brown roof which will support biodiversity (including the provision of hibernacula and local wildflower species). The proposed landscape strategy for the site includes a combination of green wall systems, including: pre-planted green screen panels to achieve an instant impact in respect of visual screening at the Site's northwest corner and part of the northern boundary; installation of a framework adjacent to the building's elevation to enable to climber plants to grow and mature over time at the northwest corner and partly along the A5 Edgware Road (western) elevation; and installation of a suspended framework between the ground and building (hi-tensile steel cable system) creating a green canopy along the southern section of the building's western elevation and at the southwest corner of the Site.</p> <p>The proposed waste transfer station would also be subject to other consenting regimes relating to environmental impacts. Specifically, the applicant will be required to apply for and obtain an Environmental Permit from the Environment Agency.</p>
39.	<p>The ecological report states that clearance of this site would result in the loss of Open Mosaic Habitat of a value equivalent to Borough Importance. It also states that protected reptiles, notably Slow Worm and Common Lizard, are widespread in the outer London Boroughs and one or both are likely to occur on the site. There is some habitat, in the buildings, trees and scrub, for common breeding birds, potentially including Section 41 species such as Song Thrush, Starling & Dunnock.</p>	<p>The Application site is of little ecological value as it is currently occupied by Selco Builders Merchants and its ancillary uses including car parking and hardstanding. The Site is also heavily influenced and dominated by railway and road infrastructure at its eastern and western boundaries, respectively. The nearest (nationally) designated nature conservation site is located approximately 900 metres to the northwest of the Site (Welsh Harp SSSI and Brent Reservoir LNR) with significant highway infrastructure situated in between. The Dudding Hill Loop between Cricklewood and Harlesden SINC (Site of Importance to Nature Conservation) is located approximately 200 metres to the south of the site. However, there are existing scattered trees and shrub planting located along the western boundary of the Site, adjacent to the A5 Edgware Road,</p>

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		<p>and eastern boundary of the Site, adjacent to the railway corridor. The proposed development would result in the removal of some of the existing vegetation; however, new landscaping is proposed as part of the scheme including the replanting of trees along the A5 Edgware Road, ground planting along the entirety of the western boundary of the site and part of the northwest corner (including amenity grass, shrub planting and wildflower mix), and the installation of a brown roof covering approximately 30% of the roof space providing local wildflower species and hibernaculum. The proposed development would also include the erection of a number of green screens/walls and hi-tensile wire structures (some pre-planted) providing the opportunity for the establishment of an array of planting. Chapter 10 of the Supplementary Environmental Statement (July 2018) and its associated appendices contains an assessment of the ecological and nature conservation impacts of the proposed development. In regard to the abovementioned national and local designated sites, no significant impacts were identified. No vegetation clearance will take place during the bird breeding season and reptile active season.</p>
40.	<p>The Invertebrate Survey by Russell Miller (Arboriculture & Ecology) that was completed for a site right next door to this application included in the developers documents for 17/5761/EIA details 131 species residing in this area: over 30% local, scarce or rare. This includes a number of pollinators and rare bees. The UK is legally committed to protecting biodiversity & pollinators, at EU & global levels. Agreeing to this policy would go against The National Pollinator Strategy: for bees and other pollinators in England released November 2014 and authored by Rt Hon Elizabeth Truss MP. The developers in their plans have not addressed needs of pollinators on brownfield sites (as detailed in the strategy). The author of the report also states that this area is of greatest importance to invertebrates. This is a UK BAP Priority Habitat, i.e. Open Mosaic and is of regional importance for invertebrates.</p>	<p>See Officer Response to Row 39.</p>
41.	<p>That this is a site of regional importance is also recognised in The Ecology Report contained in this application by Paul Robinson. This report says protected reptiles, namely Slow Work & Common Lizard are at risk from this development as are Section 31 species such as Song Thrush, Starling and the Dunnock due to the loss of habitat. A full ecological impact assessment has not been carried out (as reported by Paul Robinson) and mitigation not considered. So this proposal contravenes the London Plan</p>	<p>See Officer Response to Row 39.</p>

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	policy 7.19 as it does not "make a positive contribution to the protection, enhancement, creation and management of biodiversity" & will have a significant adverse effect on the population or conservation status of a protected species, priority species & habitat.	
42.	The development application will bring increased infested rats, mice and foxes.	The proposed development would be carried within the fully enclosed WTS building, which would be constructed with a 5.5-metre-high concrete wall containing the operation. The proposed facility would also controlled through the Environmental Permitting procedure of the Environment Agency
TRANSPORT		
Transport – General Comments		
43.	Traffic Impact report to be made public for consideration and comment.	The application and all supporting documents and plans are available on the Barnet planning portal. Hard copies are also available to view at the Planning Reception. The traffic impact is contained within the following reports: Phase 2 (South) (Thameslink Station) Waste Transfer Station – Transport Report (2017); Phase 2 (South) (Thameslink Station) Waste Transfer Station – Transport Report Addendum (July 2018) (new); and Phase 2 (South) (Thameslink Station) Waste Transfer Station – Transport Report Supplementary Addendum (August 2018).
44.	There is concern that the surrounding roads are not built to withstand the extra weight of the HGVs and the quality of the roads in the area are already rapidly deteriorating. The impact of extra HGV on these roads will increase the situation.	The HGV vehicles accessing the site will be using the strategic road network including the A5(Edgware Road), which are built to the relevant adoptable standards.
Transport – HGVs		
45.	Concerned by the increased movements of lorries that the development proposal will entail, both for construction and operation. Congestion on the A5 will be made worse.	The planning application is supported by a transport assessment which provides the applicants' assessment of the proposed development in regard to capacity of the site access junction, proposed HGV movements and traffic flows on the A5 Edgware Road. This has been reviewed and accepted by the Council's Transport officers and by TfL and shows that the proposed WTS, including signalisation of Geron Way, would not give rise to significant adverse impacts on the highway network. The traffic model used incorporates the approvals for the BXC regeneration scheme to date (i.e. Phase 1A North, Phase 1B North and Phase 1B South) and takes into account the cumulative impact of the wider BXC development and other committed developments. The modelling compares the

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		<p>impact of 742 HGV movements (371 in, 371 out) plus 172 staff car movements (86 in, 86 out) as envisaged in the S73 Permission with the proposed WTS development of 414 HGV movements (207 in, 207 out) and up to 20 staff movements (10 in, 10 out) proposed within this planning application. It also takes into account fact that the Bestway business is retained, the adequacy of the existing A5/Geron Way junction and the impact of introducing signals at this junction on the local highway network.</p> <p>The existing Selco Builders Merchants generates more vehicle traffic than the proposed WTS. As such there would be a reduction in total traffic volumes from 1,492 vehicles (surveyed between 07:00 to 19:00 on a weekday) to 414 HGV movements (incorporating RCVs, caged vehicles and street sweepers) over the same 12-hour period plus staff movements (12 staff are proposed). The proposed development would also represent a reduction in HGV and other vehicle movements when compared to the WHF already consented by the 2014 S73 Permission. Therefore the net impact of the proposed development compared to the existing land use and extant committed development scheme would reduce traffic volumes.</p>
46.	The structural design of the surrounding houses will be impacted by the vibrations of the additional HGVs.	HGV movements will be confined to the A5 (Edgware Road) apart from when refuse collection vehicles collect waste from residential streets. The submitted ES includes an assessment of noise and vibration from the proposed development and there is no evidence to show that vehicles associated with the WTS will result in structural impacts on existing houses.
Transport – Safety		
47.	<p>The streets are too narrow to accommodate the additional volume of traffic that would be generated by the proposed development and would also endanger residents.</p> <p>Residents have overall concerns regarding safety as a result of the development proposal. Additional comments were made relating to the increase of safety issues as a result of increased traffic from the WTF.</p> <p>The increase of lorries on the surrounding streets will increase the risk of accidents for cyclists and make walking and cycling environment extremely unpleasant.</p>	<p>The principle of a WHF on this site is consented as part of BXC development. The traffic impact of the wider BXC development, including the WHF was considered as part of the 2010 Outline and 2014 Section 73 applications through detailed traffic modelling which was found to be acceptable by the LPA, TfL and GLA. The proposed development will result in fewer vehicle trips compared to the exiting Selco builders merchants and compared to the trips associated with the waste facility approved under the S73 Permission. The proposed development includes the signalization of the existing junction between Geron Way and the A5 Edgware Road. As well as vehicular access and safety, this will improve the junction for pedestrians and cyclists and make crossing the A5 in this location easier and safer. The proposed development will result in fewer vehicle trips compared to the exiting Selco builders merchants and compared to the S73 Permission for the WHF. All HGV movements associated with the WTS will be directed along the A5 Edgware Road other than any refuse collection vehicles collecting waste from residential streets.</p>

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48.	Trucks accessing the waste transfer station will be using Dollis Hill and Cricklewood which will pose a road safety risk to the primary and secondary school students making their way to and from the many schools in the area.	Other than any refuse collection vehicles collecting waste from households in those areas, all HGV movements associated with the WTS will be directed along the A5 Edgware Road.
49.	Residents raised concern around the safety of the site with flammable products being stored on a daily basis. Further information is requested around what mitigation methods have been proposed to ensure the WTS does not catch alight.	The proposed development has been designed based on the latest Fire Prevention guidance compiled by the Environment Agency. The LPA have consulted the Environment Agency and also the London Fire Brigade who have both confirmed that they are content with the application. Beyond the planning process, operation of the proposed development would also require an Environmental Permit from the Environment Agency, an integral part of which will be a Fire Prevention Plan.
Transport – Traffic Increase and Congestion		
50.	The scheme needs to illustrate how it has collaborated with the Department of Transport to address the impacts of the increase of traffic and noise on local residents in the area.	See Officer Response in Row 48 . The A5 (Edgware Road) is part of the Strategic Road Network which Transport for London have oversight responsibility. Any proposals for signals on this network requires TfL's consent. TfL have been consulted on the application and have reviewed the traffic modelling undertaken to assess the impact of the development. The proposed development will result in fewer vehicle trips compared to the exiting Selco builders merchants and compared to the trips associated with the waste facility approved under the S73 Permission.
51.	Concerns regarding degrading of the roads as a result of extra heavy vehicles in the area.	See Officer Response in Row 47 .
52.	The local side roads are currently used by commuters to bypass traffic on the A5. Any additional traffic, especially HGVs, onto the A5 will increase the traffic pressures on the local side roads (Dollis Hill was mentioned by submitters).	The existing rat-running on local roads is not a result of the proposed development. The proposed development will result in fewer vehicle trips compared to the exiting Selco builders merchants and will also generate fewer trips compared with the waste facility approved under the S73 Permission. Therefore the proposed development will result in less vehicles on the A5 as a whole.
53.	The plans for Brent Cross Regeneration will hugely increase residential and shopping related traffic. Further information is requested on how this has been considered in the current proposed development. This development proposal with the residential apartments (Fellows Square Development) to be built nearby will increase the traffic on Edgware road significantly and exacerbate the current traffic issues on	The principle of a WHF on this site is consented as part of BXC development. The traffic impact of the wider BXC development, including the WHF was considered as part of the 2010 Outline and 2014 Section 73 applications through detailed traffic modelling which was found to be acceptable by the LPA, TfL and GLA. The planning application is supported by a transport assessment which provides the applicants' assessment of the proposed development in regard to capacity of the site access junction, proposed

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	<p>that road.</p> <p>The traffic assessment should also take into account the traffic increase from the Brent Cross Shopping Centre Development when conducting the impact on the A5 and surrounding roads.</p> <p>The development will cause more traffic that then will impact on the commuting options in the area.</p>	<p>HGV movements and traffic flows on the A5 Edgware Road. This has been reviewed and accepted by the Council's Transport officers and by TfL and shows that the proposed WTS, including signalisation of Geron Way, would not give rise to significant adverse impacts on the highway network.</p> <p>The traffic model used incorporates the approvals for the BXC regeneration scheme to date (i.e. Phase 1A North, Phase 1B North and Phase 1B South) and takes into account the cumulative impact of the wider BXC development and other committed developments.</p> <p>The existing Selco Builders Merchants generates more vehicle traffic than the proposed WTS. As such there would be a reduction in total traffic volumes from 1,492 vehicles (surveyed between 07:00 to 19:00 on a weekday) to 414 HGV movements (incorporating RCVs, caged vehicles and street sweepers) over the same 12-hour period plus staff movements (12 staff are proposed). The proposed development would also represent a reduction in HGV and other vehicle movements when compared to the WHF already consented by the 2014 S73 Permission. Therefore the net impact of the proposed development compared to the existing land use and extant committed development scheme would reduce traffic volumes.</p> <p>When assessed at the maximum proposed throughput of 195,000tpa, the transport assessment concludes that in 2021 there would be no capacity issues at any of the modelled junctions along the A5 (i.e. no junction would be over 90% Degree of Saturation ('DoS')) and thus there would be no adverse impacts on the highway network as a result of the proposed development. However, in 2031 after the rest of the BXC development has been completed after the proposed WTS has commenced operation and assuming operation at the maximum proposed throughput of 195,000tpa on opening), with Humber Road remaining as a priority junction, the transport modelling indicates that the proposed A5/Geron Way junction would have DoS over 90% during the AM peak only. By comparison, with the signalisation of Humber Road, the A5/Geron Way junction would operate within acceptable limits.</p> <p>To determine the point at which works to Humber Road are required to mitigate the impact of the wider BXC regeneration scheme, the Applicant has conducted supplementary modelling. The results indicate that in 2024 when the MML Bridge would become operational, this additional route connecting the BXC development to the west and, therefore, consequent change in traffic flows would result in DoS over 90% at the proposed Geron Way junction. As such, it is reasonable to suggest</p>

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		that mitigating works to Humber Road should be linked to the delivery of the MML Bridge. Given this association with a development forming part of the Phase 2 (South) (Thameslink Station) sub-phase and as works to Humber Road are already consented through the 2014 S73 Permission, it would be appropriate to ensure that this identified mitigation is secured through an amendment to the S73 Permission and by way of an appropriately worded condition imposed on any planning permission granted.
54.	Further information is requested on how the proposed development is in alignment with the London Mayors focus on reducing traffic across London.	The Mayor of London's recently published Transport Strategy (2018) focuses on the delivery and increased uptake of non-car modes of transport in London through the promotion of a 'healthy streets' approach. This Strategy also recognises the continued need for essential road-based freight movements. It is considered that such essential freight movements would include those required by the statutory waste disposal authority (NLWA) to facilitate the management of London's waste, particularly in view of the policy aim to become self-sufficient in respect of managing London's waste within London.
Transport – Public Transport		
55.	<p>The development proposal will cause severe delays on local public transport (buses).</p> <p>These HGVs will have to cross bus lanes in both directions. The routes which currently use the A5 passing the access to the site or close to it are: 32, 332, 245, 182, 232, 266 and a school bus service, the 632. Then there is the 16 and 316 which terminate at Cricklewood Garage further south. There are a number of other buses which are not in service on the A5 but use the Cricklewood Garage when not in service. All the additional HGVs will contribute to severe disruption to these bus services every weekday.</p>	<p>TfL have been consulted on the application and are satisfied with the modelling undertaken in consideration of the impact on bus journey times. The signalisation of the Geron Way / A5 junction will allow the potential for existing bus routes to access the western entrance of the new Thameslink train station.</p> <p>There are no existing bus lanes outside the site.</p>
56.	There are few plans in place for required increase in public transport which would help reduce pollution and congestion.	The planning application although considered within its own merits is a planned development within the overall Brent Cross Regeneration scheme which has planning approval. The wider BXC scheme will deliver a new Thameslink Train Station, a replacement bus station at the Brent Cross Shopping Centre, improved pedestrian connections across the Midland Mainline Railway as well as across the A406 North Circular and A41 Hendon Way. This will significantly improve access to public transport services in the area and improve the overall Public Transport Accessibility Level allowing a significant modal shift. The delivery of the WTS will allow the new Thameslink Train Station to be

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		constructed by allowing the existing Hendon WTS to be redeveloped.
57.	A new Thameslink station will not meet the demand as it is already impossible to get on the Thameslink if you want to commute from Cricklewood due to maximum commuters.	This comment is noted. The Capacity of the new Thameslink Station and existing and future train services on the Thameslink line is not a material consideration in this application. This will be considered when the application for the station comes forward.
Transport – Cycling		
58.	Cyclists will be impacted through ability to navigate and visibility on the roads therefore discouraging cycling as a form of transport in the area. The A5 should be looked at to include cycle lanes to encourage safe cycling in the area.	The A5 Corridor is an area of strategic consideration by TfL and the relevant adjoining boroughs. Barnet and TfL have committed to work to look at how differing transport priorities and functions can be addressed along the A5. This will consider how best to accommodate provision for cycling and how to encourage cycling. .
MONITORING AND ENFORCEMENT		
59.	There is concern that Barnet Council has lacked appropriate monitoring and management of the Donoghue’s Waste Transfer site and including an additional waste site across the tracks without appropriate management will bring unacceptable noise, dust and traffic to this site.	The application has prepared a draft management plan that sets out the management processes and best practice in operations and the control of dust and air-quality matters. The final plan will be secured through condition to ensure it is implemented and adhered to by the applicant. The site will be leased by North London Waste Authority and operated by London Energy Ltd. Further controls will be in place through the environmental permitting process required by the Environment Agency. Responses to the assessment of noise, dust and traffic are provided above under the relevant headings.
60.	During the operation of the site how will the management ensure that lorries don’t use surrounding local network roads and therefore cause long-term effects on the residential houses?	All HGV movements associated with the WTS will be directed along the A5 Edgware Road other than any refuse collection vehicles collecting waste from residential streets. Residual waste and food and garden waste will be taken to the Edmonton EcoPark via the A406 North Circular. These vehicle movements will be controlled through appropriate planning condition.
61.	Further information is requested on what mitigation measures around controlling rubbish have been put into place to ensure that the surrounding neighbouring streets like Dollis Hill lane do not end up with waste in the residential area.	The facility will be subject to a site management plan that sets out the management processes and best practice in relation to operation of the site, including control of waste material to prevent transfer outside of the facility.
ADDITIONAL COMMENTS		
Additional Comments – General Comments		

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62.	I object based on the proximity to place of worship.	The site of the proposed WTS is within 1km distance to the following two registered places of worship: Jesus House of All the Nations and Claremont Free Church. These two places of worship are on the other side of the railway tracks and therefore it is not considered that the proposed development will detrimentally impact these facilities. It is noted there are additional places of worship within Cricklewood however again these areas are not foreseen to be negatively impacted by the development.
63.	An additional train station is not necessary for this area.	The Train Station application is not included in this application. The station has an outline planning approval under the s73 Permission for the regeneration of BXC.
64.	There is already a recycling facility in Barnet away from a built up area and there is therefore no reason to have another one so close by. Questions were raised regarding why an additional waste station is needed when there is one located on the other side of the railway. Further information is needed as to the need to move the current waste transfer station.	The new Waste transfer Station will replace the existing Hendon Waste Handling Facility on the east side of the railway which will make way for the new Thameslink Train Station and associated development as part of the regeneration.
65.	The Council should look instead at regenerating the site to include premises for local businesses, grocery shops, recreational areas, cafes and bars, good cinemas, bookshops, gyms, etc.	The site is currently occupied by a Selco builders merchants. Overall the BXC regeneration scheme will deliver a new town centre, expanded shopping centre, new office quarter, replacement bus station and new train station, infrastructure provisions, improvements and new community facilities including schools. The benefits of this regeneration scheme will extend beyond the area of the development and beyond Barnet Council's administrative boundary. All of these overall benefits are considered to positively increase the liveability of the area.
66.	Although the development application is within Barnet more needs to be done to address Brent resident issues, taking into account Brent related activities (infant and nursery school, redevelopment of the Parade, Dollis Hill area). The Regeneration of Barnet should not be at the cost of Brent residents.	See Officer Response at Row 67 . Any proposals to redevelop sites within Brent should be directed to London Borough of Brent.
67.	Concerns around Brent Council's involvement in supporting Brent Residents and their involvement in the process of this Planning Application. Justification sought on how Brent Council has been involved in the process and supporting Brent Residents issues.	The London Borough of Brent have been consulted through the application process in accordance with the statutory requirements. Brent Council's involvement and support of residents residing in Brent is the responsibility of the Brent Council.

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68.	Further studies need to be done on the impact this development application will have on the Dollis Hill Ward due to the current metal and waste recycling yard within Neasden Lane. The surrounding houses and roads are covered in thick grey dust and debris blown from the site onto the streets are also covered in thick dust. Further introduction of a waste facility within the area will negatively increase the emissions in the homes, schools, eateries and recreational spaces in the area.	Concerns about the impacts of existing waste recycling facilities in Neasden Lane should be directed to Brent Council. The proposed WTS will handle a different type of waste. See Officer Responses at Rows 16-34 for information on how the impacts of the development have been assessed through the EIA process.
69.	Consideration needs to be taken into account on how the Council will financially compensate the local residence for the disadvantages they are dealing with as a result of the proposed development application.	The proposed development has been assessed through the EIA and planning process and subject to the mitigation secured and conditions to be imposed, the proposed facility is not considered to result in detrimental impacts on surrounding area. The development is part of the wider BXC regeneration which will deliver significant benefits and improvements to the area.
70.	I am in support of the application.	Noted.
71.	I object on the basis of unknown hazards of new technology the WTS will bring.	The proposed development has been assessed through the EIA and planning process and subject to the mitigation secured and conditions to be imposed, the proposed facility is not considered to result in detrimental impacts on surrounding area.
72.	Further information is requested on how the Regeneration of Brent Cross area is going to overall benefit Brent residents.	Overall the BXC regeneration scheme will deliver a new town centre, expanded shopping centre, new office quarter, replacement bus station and new train station, infrastructure provisions, improvements and new community facilities including schools. The benefits of this regeneration scheme will extend beyond the area of the development and beyond Barnet Council's administrative boundary. All of these overall benefits are considered to positively increase the liveability of the area.
73.	The London Waste Authority originally opposed this site on the grounds of proximity of schools and houses also including the proposal not being practical, feasible and indeed big enough to sustain the amount of waste needed. Further information is requested on how this has been addressed.	The proposed facility has been designed in conjunction with and to meet the requirements of the North London Waste Authority. These requirements can be adequately accommodated on the site.
74.	Further information is needed on how the proposal has been considered in light of the RFF development in context of increased HGV, noise and air quality. The proposed freight hub a short distance away will be bringing additional HGV's per day on top of this development proposal.	This technical assessments that accompany the Supplementary Environmental Statement and the transport modelling for the development have been carried out to consider the impacts of the proposed development and also the cumulative impact in regard to other committed development schemes within the vicinity, including the RFF development. See Section 9 of the committee report.
75.	The proposed transfer station inappropriately provides a comparison to Vienna site. Vienna site is on a larger plot of land so Rubbish trucks can	Access into the facility is from Geron Way. The development has been designed with sufficient space for RCVs to be accommodated in the one-way access arrangements within the site. The

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	<p>queue to unload off road and within the complex which is also shielded from general public view by lines of trees this site does not have such space. The result will obviously be lines of rubbish trucks blocking the A5 (Edgware Road) a main arterial route waiting to enter and exit the site.</p>	<p>submitted plans also demonstrate space for HGVs to be accommodated within the site whilst waiting to be loaded. The development will not result in RCVs or HGVs queuing back onto the public highway. TfL and the Council's Highways officers have been consulted on the application and are content with the proposed arrangements.</p>
76.	<ul style="list-style-type: none"> - Residents here have also organised a petition. - Brent residents have not been appropriately considered throughout previous planning applications within Barnet. - The objections raised by Brent residents in the past regarding the road layouts and the massive increase in traffic: both cars and lorries on the roads have not been considered. - The regeneration plans will not bring any benefits to the Brent residents. - Consultation to date has been inadequate - The current WTS should remain as it is in a non-residential area and the waste is moved to landfill by train. - Although the proposed development is smaller than the original permission it will still cause environmental harm to the community. - The smell of the facility will be a disruption to the lives of the surrounding residents. - The proposed development is also directly next door to the Fellows Place development and across from an infant's school. - The processing and compaction will cause disrupting noise for the residents. - Nano particulate pollution has been proven to cause the most damage to small children. - The Edgware Road is already at the highest pollution levels in London. The refuse trucks and lorries will add to this. - Given the waste facility goes to landfill and recycling plants well outside London, why does it need to be located where it is? - There is major fire risks as a result of the development proposal the Chief Fire Officers Association quoted the following: "Waste fires are a consistent issue for the waste and recycling industry, 	<p>The applicant has submitted a Consultation Statement with the application prepared by GL Hearn (Dated August 2017) which sets out the programme of public consultation and engagement that has been carried out in support of the proposals for the Brent Cross Thameslink project at the pre-application stage. Statutory consultation on the planning application has been carried out by the LPA in accordance with the Town and Country Planning (Development Management Procedure) Order 2010 in both October-November 2017 and July-August 2018. This is detailed in Section 7 of this committee report. Previous planning applications associated with the BXC regeneration have also followed the relevant statutory processes for public consultation.</p> <p>Overall the regeneration scheme will deliver 7,500 new homes including affordable housing, a new town centre, expanded shopping centre, a new office quarter and generate over 20,000 jobs, provide a replacement bus station and new train station, amongst numerous other infrastructure improvements and new community facilities. The benefits of this regeneration scheme will extend beyond the area of the development and beyond Barnet Council's administrative boundary. All of these overall benefits are considered to positively impact the area.</p> <p>The site benefits from outline planning permission for a waste handling facility. The WTS will replace the existing Hendon WTS in order to make way for the delivery of the new Thameslink Station and associated development as part of the wider BXC scheme. The London Plan now requires all of London's waste to be managed within London rather than being transported by rail to landfill or processing sites outside. The new WTS will allow material to be transferred to the Edmonton Eco Park for processing in accordance with the strategic objectives of the London Plan.</p> <p>See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment.</p> <p>See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.</p> <p>The proposed development has been designed based on the latest Fire Prevention guidance compiled by the Environment Agency. The LPA have consulted the Environment Agency and also</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
	<p>with the Chief Fire Officers Association (CFOA) estimating that there have been around 250 incidents of waste fires per year for the last decade, with an estimated cost to fire and rescue services of around £16 million a year.” The proposed dump is directly opposite two petrol stations.</p> <ul style="list-style-type: none"> - The North London Waste Authority was originally opposed to the site on the grounds of proximity of schools and houses. As the residing objections have not changed (schools and house within proximity), further information is needed on why they withdrew their objection. 	<p>the London Fire Brigade who have no objections to the proposed development. Beyond the planning process, operation of the proposed development would also require an Environmental Permit from the Environment Agency which will include a Fire Prevention Plan.</p>
ELECTED MEMBERS & RESIDENT GROUPS		
LB Brent Elected Members		
77.	<p>LB Brent Cllr Parvez Ahmed for Dollis Hill ward objects to the development as a local resident and Councillor and raised following concerns:</p> <ul style="list-style-type: none"> - The proposed application and development would have an adverse effect on the local area for a number of reasons and is not suitable nor appropriate for this site. - This would be directly next to a residential area and near local schools - the existing footfall is already very high, no doubt likely to increase even further with other existing developments in the locality. - The proposed application and use a waste dump would be detrimental to local residents, local children and families and the existing footfall. - The proposed dump site is opposite a petrol station (a significant fire risk), within 200 yds of an infant school, a main-road-width away from people's homes. - The dust, smell and dirt will be suffered by local people in this heavily residential area. - It is anticipated that the dump will generate about 60 HGVs per hour into and out of the site. The freight terminal - barely 500 	<p>These comments are noted. All points are addressed in responses above and in the body of the report.</p>

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	yards away - will generate a similar volume of HGV traffic. All these heavy lorries will be using the A5 - already a very polluted road and heavily congested road not to mention the heavy vehicles that cut through residential roads like Dollis Hill Lane, Crest Road, Dollis Hill Avenue and Gladstone Park Gardens in contravention of existing regulations. Additional vehicles will exacerbate the problem.	
78.	<p>LB Brent Cllr Lia Colacicco for Mapesbury ward objects to the development as a local resident and Councillor and raised following concerns:</p> <ul style="list-style-type: none"> - In planning terms this plan represents more harm than benefit to the locality, specifically in terms of traffic impact and public health. - The diesel lorries will impact very negatively on an already dangerously poor air quality, disturbing local residential areas and making intolerable the congestion on this stretch of the A5. Whilst there may be a need for such a facility, why has Barnet once more chosen to put the nasty elements of the BXC development next door to Brent? Please act as consider neighbours and place both this and the even more harmful aggregates transfer site further up the line. They have no place in this urban setting. - In order to make consultations meaningful you need to listen to what local people are saying. They are clearly saying NO WAY, and their reasons are material planning considerations. 	These comments are noted. All points are addressed in responses above and in the body of the report.
79.	<p>LB Brent Cllr Liz Dixon for Dollis Hill ward objects to the development as a local resident and Councillor and raised following concerns:</p> <ul style="list-style-type: none"> - The plans will impact on Dollis Hill residents as the HGV lorries will be diverted onto Edgware road and the increase in traffic will pose a risk of harm to residents health. Thie oppress plans will increase the air pollution and traffic - the road is already very busy. - There is mounting concern about the freight plans and the 	Noted, comments have been answered below.

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	<p>housing development in the "cottages" and this is understandable given the impact it will have on the local community with the loss of a significant green area.</p> <ul style="list-style-type: none"> - Also objecting to the freight and raising concerns about the impact of the increase in HGV traffic which we think is a risk to health and potentially safety. - The pollution will be significant and we are mindful of the Mayor of London promise to promote cleaner air which we support. 	
LB Brent Groups		
80.	<p>Dollis Hill Residents' Association raised the following objections:</p> <ul style="list-style-type: none"> - London-wide measures are being taken to cut pollution from vehicles. The application will be in conflict of this. The pollution the extra lorries bring by moving and idling inefficiently in traffic. - Our Lady of Grace Infant School has its playground along the A5 very near to the proposed waste station; the young children will be detrimentally affected by any additional pollution caused by the lorries. - The traffic modelling does not reflect accurately the impact of the traffic for the waste station. Traffic on the A5 is already slow moving throughout much of the day and this will worsen it. - Large vehicles turning right out of the transfer station will often block the traffic as they will not be able to join the northbound carriageway which will often be solidly blocked. A yellow box is essential on the southbound carriageway so that neither the front nor back of a long waste vehicle can stop on it. - A waste transfer unit should not be accessed from the A5, which is already congested, but from a larger road such as the North Circular. - The North London Waste Authority does not need a waste transfer station at this far south-western end of the London Borough of Barnet. 	<p>See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment.</p> <p>See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.</p> <p>The signalization of the Geron Way / A5 junction will ensure that vehicles can enter and exit Geron Way safely. A yellow box is not required where there are signal controls.</p> <p>The NLWA have confirmed in their consultation response that the Geron Way facility is required as a strategic facility to receive a range of waste streams collected by the North London boroughs. The location is important to serve the boroughs in the west of the Authority's area and would reduce the environmental impacts and cost of transporting waste. The primary users of the facility will be Barnet and Camden Councils, although from time to time other boroughs may be directed to deliver waste to this facility.</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
	<ul style="list-style-type: none"> - The waste should be taken directly to Edmonton, rather than being sent first to Geron Way. - A waste transfer station should not be placed at the far south-western end of the London Borough of Barnet, which is not a convenient location for Barnet or Camden waste. 	
81.	<p>Our Lady of Grace Infant School raised the following concerns regarding the proposed development:</p> <ul style="list-style-type: none"> - The proximity of the development to the school - Impact of air quality that the children will be exposed to. - Impact on the local infrastructure, traffic and adjacent land uses. - The development's adverse effects on the health and wellbeing of the children. - Pollution levels exceeding the European guidelines - Disproportionate burden upon low-income and minority communities who live in this local area and attend our school - The overburden on this community will have a negative impact on this community creating health, environmental and quality of living concerns - The school has not been consulted in any way and therefore not keeping with consultation regulations. - Further information is requested on the weighing of consequences of placing the WTS next to the infant school. <p>In light of the views expressed the following is requested:</p> <ol style="list-style-type: none"> 1. Confirmation of the steps that have been taken to ensure that the correct planning application/procedure has been followed; 2. Details of the impact assessments that have been carried out to take on board the health, safety and welfare of the children in our school; 3. Details of objections that have already been made and any steps taken to address these concerns; 4. Details of the public consultation that should have taken place; 	<p>See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment and Section 9 of the committee report.</p> <p>See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling and Section 9 of the committee report.</p> <p>See Officer Response at Row 34 in relation to consultation and Section 7 of the committee report.</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
	and 5. A full response to the concerns outlined above.	

Table 2: Summary of Public Representations – Consultation 2 (13 July to 18 August 2018)

Issue No.	Summary of Issue/Representations Received	Officer Response
PRINCIPLE OF DEVELOPMENT		
Principle of the Development – General Comments		
82.	<p>Planning consultants acting for PB Donoghue have raised the following objections:</p> <p>We would raise objection against the lack of communication from the Council with regard to the re-submission/amendment of the application, and this subsequent consultation period. We consider that this renders the consultation period improper and fails to satisfy statutory requirements. Given the expectations of the Masterplan, our Client has a significant material interest in the site, given that it was intended that the PB Donoghue facility would be re-provided on the application site.</p> <p>We object that the application is being progressed as a ‘Drop-In Application’, rather than a Reserved Matters Application in line with the BXC Masterplan, and specifically Condition 41.1. The outline permission, and subsequent Section 73, both earmark 2 Geron Way (Plots 62/63 of the BXC Masterplan) for a Waste Handling Facility. The proposed facility is for a waste transfer facility only, with no waste processing (handling) capacity. On this basis, it is not in line with the aims of the Masterplan, nor the London Plan, so should be refused or amended to include sufficient processing to also accommodate PB Donoghue.</p> <p>We object that the application is dependent on a third party being able to accommodate the PB Donoghue Site, in addition to being dependant on a different Local Planning Authority granting consent, rather than being provided on the specifically allocated site for waste ‘handling’ within the BXC Masterplan area.</p> <p>We also object to the application reducing the facility at the allocated waste</p>	<p>Statutory consultation on the planning application has been carried out by the LPA in accordance with the Town and Country Planning (Development Management Procedure) Order 2010 and the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in both October-November 2017 and July-August 2018.</p> <p>See Officer Response in Row 2 above and Section 6 of the committee report which explains the compatibility and acceptability of a drop-in application in relation to the S73 Permission for the BXC development.</p> <p>The provision of the new waste transfer facility is as a replacement for the existing Hendon Waste Transfer Station, as required by the Cricklewood Brent Cross West Hendon Development Framework and the saved UDP policies relating to the regeneration of Brent Cross Cricklewood. At the time of the Outline application, it was accepted that the new WHF would also provide sufficient overall waste capacity by tonnage, not by type of waste processed, so as to allow the redevelopment of three other commercial waste sites within the BXC area. This was embodied in condition 41.5 of the BXC planning permission. Importantly this condition allows for compensatory capacity to also be provided through other sites, not just the WHF. The land occupied by PB Donoghue falls within Phase 4 of the BXC regeneration scheme (synonymous with Plots 31, 36 and 61) and, as such, is not therefore intended to be redeveloped until at least June 2026 according to the currently approved BXC Indicative Construction Programme. At the time that this existing waste management facility is intended to be redeveloped it would be for the applicant to demonstrate how compensatory waste management capacity has been re-provided in accordance with Condition 41.5 of the 2014 S73 Permission.</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
	site which was specifically earmarked to compensate for the loss of the four existing waste sites within the BXC regeneration area. Plots 62/63 are no longer going to be utilised to their full development potential. This is especially important, given that the PB Donoghue Site has been specifically removed as being a site to be replaced (as noted above), and that the identified replacement site, within this application, now include a new site (Upside Railway Yard).	
83.	The two volumes of Design and Access Statement spend much of their pages showing hopelessly idealised pictures of this building. Roads are devoid of vehicles, cyclists and happy young families are walking past the shed, butterflies flutter amongst unlikely looking planting CGI mockups, and there isn't a lorry in sight! No mention of the smell, traffic congestion, pollution generated by an Industrial Scale Waste Transfer Station. Fake News? I would suggest that the site be used for much needed affordable housing, flats similar to Fellows Court, just to the South along The A5.	See responses above in relation to the environmental assessment of the development and traffic assessment. The site is identified in the Cricklewood Brent Cross West Hendon Development Framework for a waste handling facility and outline planning permission has already been granted for this use.
84.	A waste transfer station (WTS) is not in line with regeneration of the local area. As existing residents we want to be proud of our "town" - a WTS will only detract from regeneration efforts.	See Officer Response in Row 1,2 and 3 above.
Principle of the Development – Location		
85.	This should be done instead in an industrial business park, out of the way of public residents and properties.	See Officer Response in Row 1,2 and 3 above. The site is identified in the Cricklewood Brent Cross West Hendon Development Framework for a waste handling facility and outline planning permission has already been granted for this use.
86.	This type of waste disposal plant should be located away from large main roads and built up areas, where there is room for it and the associated traffic and noise issues. This area needs housing and this spot would be ideal for affordable housing and residential apartments, thus easing the current housing crises and putting much needed investment back into local area.	See Officer Response in Row 1,2 and 3 above. The site is identified in the Cricklewood Brent Cross West Hendon Development Framework for a waste handling facility and outline planning permission has already been granted for this use.
87.	The waste site currently exists on the other side of the rail tracks and is being	See Officer Response in Row 1,2 and 3 above.

Issue No.	Summary of Issue/Representations Received	Officer Response
	moved to the furthest point in Barnet that is still inside of Barnet, but the majority of the area effected by the new site will be in Brent.	The site is identified in the Cricklewood Brent Cross West Hendon Development Framework for a waste handling facility and outline planning permission has already been granted for this use.
AMENITY IMPACTS		
Amenity – General Comments		
88.	This proposal of a local waste dump will add to this problem rather than easing the situation that is already very bad. Heavy goods vehicles and with this type of waste, adding to the local problems of traffic congestion and air and noise pollution are the last thing we need! It goes against the health and wellbeing of local people.	See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment. See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
89.	Questions have been raised in regard to the proper assessment of the proposal on the environment – traffic, air quality, etc.	See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment. See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
90.	The change in operating hours of this proposed site (longer opening hours) is unacceptable for neighbours in this area.	The proposed development is envisaged to be open to staff 24 hours a day; however, waste would only be received during the hours of 07:00 – 19:00 Mondays to Fridays including Bank Holidays, and 09:00 – 13:00 Saturdays. There would be no operations on Sundays. Any operations outside of these waste reception hours would be limited to preparation and cleansing within the building and, where the need arises, the exportation and transfer of bulked up wastes to other waste management facilities.
Amenity: Air Quality		
91.	London as a whole is suffering with already toxic air. This proposal will continue to endanger people's lives filling the local air with more pollution. These effects will be felt by local children when they reach adulthood.	See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment.
92.	Concern is raised about the pollution effect on the school children opposite and the proposal completely opposes the effect of new ultra-low emissions zone that is planned.	See Officer Response at Rows 1-3 in relation to location of the proposed facility and Rows 16-34 in relation to Environmental Impact Assessment.
Amenity: Noise		

Issue No.	Summary of Issue/Representations Received	Officer Response
93.	The noise caused by this proposal and the traffic it will create will ruin the local community's peaceful enjoyment of the area. The hundreds of new residents of Fellows Square will no doubt be appalled at this suggestion of a waste plant being located so close to their new luxury flats.	See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment. See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
Amenity: Odour		
94.	The waste station on the other side of the railway in Claremont Road already causes a big problem for us as we cannot open our windows in hot weather due to the smell of waste. The thought of another waste station just opposite our building is something that cannot be tolerated. Extremely worried about the air quality from the increased traffic and the smell/stink from the dump its self.	The proposed WTS will replace the existing Hendon Waste Transfer Station. Unlike the existing Hendon WTS, the new facility will be fully enclosed and will be held at negative air pressure within the building to prevent smells escaping. The facility will also have an odour abatement system and fast-acting roller shutter doors. These controls will ensure that the facility does not detrimentally impact on existing residents. See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment.
TRANSPORT		
Transport – Traffic Increase		
95.	I don't see anything that you have added to the application which addresses the increase in traffic and congestion on the A5 and surrounding areas as people attempt to avoid the A5 via the roads through Dollis Hill, or the added pollution and subsequent impact on standard of living, schools in near the location.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
96.	Our road Heber/Ashworth Road is already used as a cut through with large vehicles travelling at high speeds up and down. It is a family community with a primary school at one end of the road - this proposal will no doubt exacerbate the problem and increase the danger to pedestrians in particular, young children.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling and Row 4 in relation to pedestrian safety.
97.	The area cannot cope with the quantity of traffic and the A5 is nearly always back to back traffic jams in this area.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
98.	The extra traffic generated by the new Thameslink station and the waste Transfer Station is unlikely to be mitigated by the loss of traffic to Selco. The presentation of traffic model data for the A5/Geron Way controlled junction is obviously not meant to be read by a non-expert. It is difficult to determine	The transport modelling demonstrates that junction improvement works to Humber Road are required at a later stage in the BXC development, and not in relation to the operation of the WTS. All results indicate that there would be no adverse impacts on the highway network upon commencement of the operation of the proposed WTS

Issue No.	Summary of Issue/Representations Received	Officer Response
	delays on traffic from Geron Way turning on to the A5 at any stage in the WTS development time line. From what we can glean from the model data, the conversion of the Humber Road to a controlled junction should be done at the same time as the Geron Way development.	(i.e. in the 2021 modelled year in all scenarios) but by 2031, there would be capacity issues as a result of signalising Geron Way in later years by virtue of the cumulative impacts of the wider BXC Development and other background growth. Traffic modelling for the proposed WTS has shown that signalisation of Humber Rd prior to the opening of the New Link Road/Bridge over the railway joining the A5 to the new BX South development in 2023 enables Geron Way junction to operate within capacity but does affect Dollis Hill Lane where 90% capacity is exceeded. However, the actual number of vehicles travelling on Dollis Hill Lane is reduced from 520 in the weekday evening peak without Humber Road signalisation to 420 with the signalisation.
99.	The proposed aggregate site being developed on a nearby plot of land will have over 400 trucks a day, combine that with the traffic created from access to this new waste transfer site and Brent and Camden will have a traffic nightmare.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
100.	Making comparisons with traffic exiting from the current waste site and Selco is irrelevant to the traffic on the A5, which will rise by 828 two-way movements (or 1104 when considering the volume being applied for to the Environment Agency. The A5 is much more congested than the access road to the current waste site, so the comparisons drawn in the addendum are not valid.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
101.	The transport modelling does not accurately reflect the current traffic. The A5 already has traffic queues travelling north and south almost all day. The northbound traffic already backs up from Staples Corner to beyond the proposed access to the waste station. Further lorries exiting to, or entering from, the northbound A5 will make this even worse.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
102.	<p>It describes the A5 operating at saturation in the mornings with long queues morning and evening, and Dollis Hill Lane operating at 97.5% capacity, with a rat-running problem relieved only by opening up Humber Road to southbound traffic on the A5 and adding traffic lights to it.</p> <p>It does not describe, let alone model or forecast, the effect of all that extra traffic coming up Humber Road and out onto Coles Green Road, a road which is already incapable of supporting free two-way movement whenever the</p>	The S73 Permission approved the creation of a new signalized four-arm junction on the A5 with Humber Road to provide access to the WHF. Traffic modelling for the proposed WTS has shown that signalisation of Humber Rd prior to the opening of the New Link Road/Bridge over the railway joining the A5 to the new BX South development in 2023 enables Geron Way junction to operate within capacity but does affect Dollis Hill Lane where 90% capacity is exceeded. However, the actual number of vehicles travelling on Dollis Hill Lane is reduced from 520 in the weekday evening peak without Humber Road signalisation to 420 with the signalisation. This

Issue No.	Summary of Issue/Representations Received	Officer Response
	three local buses go along it.	suggests less rat running on Dollis Hill Lane. At the same time there are 150 vehicles less in the am and pm peaks on Humber Road on all days. Traffic is either redistributed on the network or more likely drivers are changing their mode of travel to the new trains and buses that have become more widely available and accessible with the regeneration project being completed.
Transport – Infrastructure		
103.	The revised application serves to confirm what we already know: increased air pollution, traffic, and congestion on the A5 and surrounds. The drawing BXT-CAP-0100-I-SK-C-0008 confirms all the above, a road infrastructure that cannot cope with the additional traffic of 452 + HGV's.	See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment. See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
104.	The large residential development along Edgware Road (opposite Dollis Hill Lane) is already causing a problem and the already approved extension of Brent Cross shopping centre will add to road congestion leaving no margin for additional lorries and vans accessing the proposed development.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
105.	We sometimes cannot access our own entrance due to HGV's from Bestway attempting to turn the sharp corner by the Selco entrance being blocked by vehicles turning into Selco.	The application includes the signalization of the Geron Way / A5 junction and will significantly improve the safety and operation of this junction.
106.	Another set of traffic signals on an already severely congested road, will only increase the level of stationary traffic. Oxgate Gardens (My Street) is used as a cut through for impatient drivers who do not want to wait at the traffic signals at the A5 and Dollis Hill Lane.	The signalization of the Geron Way / A5 junction and will significantly improve the safety and operation of this junction. See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.
107.	I strongly object to the proposed road junctions allowing southbound A5 vehicles to turn right onto Humber Road and Oxgate Gardens. These roads are narrow and unsuitable for rat-run traffic and articulated vehicles.	The S73 Permission approved the creation of a new signalized four-arm junction on the A5 with Humber Road to provide access to the WHF. Traffic modelling for the proposed WTS has shown that signalisation of Humber Rd prior to the opening of the New Link Road/Bridge over the railway joining the A5 to the new BX South development in 2023 enables Geron Way junction to operate within capacity but does affect Dollis Hill Lane where 90% capacity is exceeded. However, the actual number of vehicles travelling on Dollis Hill Lane is reduced from 520 in the weekday evening peak without Humber Road signalisation to 420 with the signalisation. This suggests less rat running on Dollis Hill Lane. At the same time there are 150 vehicles less in the am and pm peaks on Humber Road on all days. Traffic is either redistributed on the network or more likely drivers are changing their mode of travel

Issue No.	Summary of Issue/Representations Received	Officer Response
		to the new trains and buses that have become more widely available and accessible with the regeneration project being completed.
CONSULTATION		
108.	In noting potential cross-boundary effects, residents have asked whether proper consultation has been carried out with Brent and Camden councils.	The applicant has submitted a Consultation Statement with the application prepared by GL Hearn (Dated August 2017) which sets out the programme of public consultation and engagement that has been carried out in support of the proposals for the Brent Cross Thameslink project at the pre-application stage. This includes consultation events held in Brent. Statutory consultation on the planning application has been carried out by the LPA in accordance with the Town and Country Planning (Development Management Procedure) Order 2010 in both October-November 2017 and July-August 2018. This is detailed in Section 7 of this committee report. This includes consultation with LB Brent.
109.	Residents have raised concern that their objections to the proposed development, and the reasons for raising them (i.e. air quality and traffic impacts) are being ignored.	All objections have been taken into consideration in the assessment of the application. The application has been the subject of an EIA process which has been reviewed by the Council's technical advisors. Taking into account the design of the proposed development and mitigation measures to be implemented, the conclusions of the EIA and the advice of technical advisors, the proposed development is considered to be acceptable.
110.	The consultation should be extended. The Transport Report Supplementary Addendum with a covering letter dated 13 August 2018, the closing date for the consultation, was produced too late for comments to be made.	Statutory and public consultation on the planning application has been carried out by the LPA in accordance with the Town and Country Planning (Development Management Procedure) Order 2010. The Transport Report Addendum and other additional information was consulted on for 30 days in July-August 2018 in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The LPA provided a further period of consultation on the Transport Report Supplementary Addendum for 14 days in August 2018.
OTHER COMMENTS		
111.	The recent decision by Hammerson not to go ahead with the re-generation of Brent Cross should mean that also is reviewed and we can only hope that common sense prevails sooner rather than later.	Whilst identifying a delay to the programme of works, the recent announcement made by Hammerson included a long-term commitment to the Brent Cross Shopping Centre and its redevelopment. This is one element of the approved Brent Cross Cricklewood regeneration scheme and, as far as the Local Planning Authority are aware, the scheme will continue to progress including the construction of the new WTS to facilitate the delivery of the new Thameslink train station.

Issue No.	Summary of Issue/Representations Received	Officer Response
112.	<p>Why were the block of flats on the Barnet A5 allowed to be built when they will directly compromised by the waste transfer centre noise and smell/pollution? This is bad planning.</p>	<p>Planning permission for the redevelopment of the former Parcelforce Depot site was approved in 2012 under Barnet planning reference F/01932/11. This application was assessed against the consented outline planning permission for BXC which was approved in 2010 and which approved the construction of the waste handling facility on the Geron Way and Bestway Cash and Carry site. The design, mitigation and assessment of the current WTS application has been made on the basis of the residential development at Fellows Square.</p>

Table 3: Summary of Public Representations – Consultation 3 (13 August to 27 August 2018)

Issue No.	Summary of Issue/Representations Received	Officer Response
PRINCIPLE OF THE DEVELOPMENT		
Principle of the Development – General Comments		
113.	<p>Barnet is the largest London Borough by population with around 385,000 inhabitants so the waste will be proportional, and residents close to the A5 will have to endure the nuisance caused because of the transportation of all kinds of waste as well as recycling and storage of waste and onward transportation of waste from the proposed site in Geron Way.</p>	<p>The site is identified in the Cricklewood Brent Cross West Hendon Development Framework for a waste handling facility and outline planning permission has already been granted for this use.</p> <p>See Officer Response in Row 1,2 and 3 above.</p> <p>See Officer Response at Rows 16-34 in relation to Environmental Impact Assessment.</p> <p>See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling.</p>
Principle of the Development – Location		
114.	<p>As local residents of Brent living near the A5, we are extremely concerned about Barnet council wanting to have its waste disposal right on our doorstep, on what is the very limit of Barnet’s border with Brent council. It couldn’t be further away from Barnet proper so as not to inconvenience its own residents.</p> <p>As residents we are furious that Barnet is choosing this particular location for the waste disposal site as it is literally dumping its rubbish on someone else’s doorstep.</p>	<p>The application site (and adjacent land occupied by Bestway Cash & Carry) already benefits from outline planning consent to construct a waste handling facility as part of the Section 73 Planning Permission granted for the Brent Cross Cricklewood regeneration scheme in July 2014. The principle of development has therefore been established and is considered as being acceptable in planning terms. The NLWA have confirmed in their consultation response that the Geron Way facility is required as a strategic facility to receive a range of waste streams collected by the North London boroughs. The location is important to serve the boroughs in the west of the Authority’s area and would reduce the environmental impacts and cost of transporting waste. The primary users of the facility will be Barnet and Camden Councils, although from time to time other boroughs may be directed to deliver waste to this facility.</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
TRANSPORT		
Transport – Traffic Increase		
115.	We use the A5 on a daily basis and can vouch for the poor road conditions, the heavy traffic, fumes and noise. Having the waste disposal site here will only make things much worse and aggravate the already difficult driving conditions on a major artery leading to central London from a much used Brent Cross which is busy at all times. Its proximity to the North Circular will also contribute to traffic jams and more mayhem.	See Officer Response at Rows 44-60 in relation to Transport Assessment and traffic modelling and Row 4 in relation to pedestrian safety.
OTHER COMMENTS		
116.	Geron Way is in the Ward of Childs Hill which is the most populated (rank 1) of Barnet council with 19,460 inhabitants and the 5th most densely populated ward. More and more flats are being built in the area and more specifically on the A5 close to the proposed site causing more traffic, fumes, and worse living conditions. Population density is 64.9 per hectare as opposed to only 17.3 per hectare in the least populated ward of Totteridge for example, or 18.4 per hectare in the second lowest ward of High Barnet. Surely there would be less inconvenience if the site were to be in a less densely populated area such as the afore-mentioned Barnet wards.	The application does not propose residential development. The wider BXC development will deliver new housing, employment space, retail space, community facilities and infrastructure, for which outline planning permission was granted in 2010 and 2014.
ELECTED MEMBERS & RESIDENT GROUPS		
LB Brent Elected Members		
117.	LB Brent Cllr Liz Dixon for Dollis Hill ward submitted further comments on behalf of Dollis Hill, Dudden Hill and Mapesbury Councillors quoting comments that LB Brent Council has made in its formal response. The comments relate to: <ul style="list-style-type: none"> - layout of the signalised junction of Edgware Road and Geron Way in relation to Hanover House on the western side of Edgware Road. - the increased volumes of heavy goods vehicles travelling to and from the site in relation to acceptable environmental impact on the local highway network in terms of traffic flow and exposure of the local community to noise and air pollution. - Highlighted concerns and objections of local residents including 	The submission does not introduce any new comments. All points are addressed in responses above and in the body of the committee report.

Issue No.	Summary of Issue/Representations Received	Officer Response
	<p>submission of petitions.</p> <ul style="list-style-type: none"> - There is strong objection to the proposed road junctions allowing southbound A5 vehicles to turn right onto Humber Road. - The recently approved aggregate superhub, just south of this site will add some 450 lorry movements per day to the already busy A5. The additional movements from waste lorry movements will add to the already busy main road and pose added health and safety risks . - There is no need for the WDU to be in this area and it should be nearer Edmonton to reduce traffic and pollution. 	
Resident Groups		
118.	<p>Fordwych Residents Association (FRA) have submitted the following comments in objection:</p> <ul style="list-style-type: none"> - While we welcome efforts to improve recycling and waste transfer facilities, it seems this proposal will lead to a vast increase in vehicle traffic. This combined with the traffic from the new aggregate site nearby will increase traffic, especially the number of HGVs using the surrounding area. Traffic from both sites should be taken into consideration in any traffic projection models. - Concern that the waste transfer station will stay open until 7pm. - Barnet Council revised traffic studies in August, but did not hold a public meeting to discuss the findings and request feedback from residents and concerned local groups. - Huge increase in air pollution - particularly from nitrogen dioxide and particles associated with the diesel engines used by the lorries/HGVs that will be entering and leaving this site. - The additional traffic will cause congestion on already busy roads. - Congestion will spill over onto other local routes. Many lorries/HGVs now use residential streets in the area in an attempt to avoid congestion on the A5. - Pedestrian and cyclist movement in the area will be endangered by increased vehicle movements - and make pedestrian crossings in the area more dangerous. 	<p>Comments relating to traffic movement and air quality impact have been addressed above and in the body of the committee report. This includes the accumulative impact of the development with committed schemes in the vicinity.</p> <p>The impact assessments for the proposed development are based on the operational hours proposed. A planning condition is recommended to limit the number of HGV movements to no more than 2 per hour between 17:00-19:00 Monday to Friday.</p> <p>Statutory and public consultation on the planning application has been carried out by the LPA in accordance with the Town and Country Planning (Development Management Procedure) Order 2010. The Transport Report Addendum and other additional information was consulted on for 30 days in July-August 2018 in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The LPA provided a further period of consultation on the Transport Report Supplementary Addendum for 14 days in August 2018.</p> <p>The application includes signalization of the Geron Way/A5 Edgware Road junction. See Row 4 in relation to pedestrian safety.</p> <p>See Row 3 for principle of development.</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
	<ul style="list-style-type: none">- Reduced quality of life for local residents, who will suffer from the increased air pollution, dust annoyance and the lack of any benefit to the local community from this development.- Comments on this application should be requested from both Camden Council and Brent Council.- Request that Barnet Council rejects this application.- Request less harmful uses are considered for the site	