

## **APPENDIX B**

### **Report Summary of Public Consultation Responses**

## 1. Introduction

The purpose of this report is to provide a summary of the comments received in response to the Local Planning Authority's formal notification of the Rail Freight Facility (175761EIA) planning application.

Table 1 provides a summary of the main issues grouped into seven themes with a brief officer response provided. Table 2 provides the full summary of comments received.

*Table 1 – Themes and Officer Response*

<b>Theme: Principle of Development</b>
<p>Numerous submissions have requested for no further industrial use and the land to be rezoned for residential or urban purposes. This includes for any development proposal to reflect the surrounding context especially with the proximity to local schools.</p> <p>There is concern on the impact to the livability of the area as a result of the expected increase in traffic and the dust and noise emissions. Additionally, some feel that the structure of the surrounding houses would be at risk of substantial damage as a result of the planned increase in rail freight activities and in some cases the extra HGV on the road.</p> <p>Further information was requested on how the application will benefit with Brent Cross Regeneration area. Some submitters believe the application does not align with the regeneration scheme.</p> <p><b>Officer Response:</b></p> <p>Along with replacement train stabling facilities, a replacement waste handling facility, and a new road bridge over the midland mainline, a replacement rail freight facility is required as part of the wider Brent Cross Cricklewood regeneration in order to facilitate the delivery of the new Thameslink Station. The new Rail Freight Facility will replace the existing Strategic Rail Freight Site (as designated by Network Rail) currently occupied by the Hendon Waste Transfer Station 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.</p> <p>The site at the application site already has outline planning permission for an intermodal rail freight facility (the 'Rail Freight Facility') as part of the Section 73 Planning Permission granted for the Brent Cross Cricklewood regeneration. However, because the proposed facility will handle a different type of freight (aggregate instead of containerised goods), requires less land and therefore occupies a smaller site (allowing the Lidl, Timeguard and Access Storage businesses to remain), and does not include the construction of a large building to enclose the whole facility (the proposal is open air but includes structures covering parts of the site), the proposals are not able to be brought forward under reserved matters pursuant to the S73 Permission. As a result a stand-alone planning application known as a 'drop-in' application is required which drops the new proposal into the masterplan for Brent Cross.</p> <p>The delivery of the Rail Freight Facility, along with other infrastructure will enable the new Thameslink train station to be constructed and will release land on the east side of the railway for the delivery of the eastern station entrance and transport interchange. It will also facilitate the commercial and residential development around Station Square to be delivered which will ensure that the new station is integrated with the wider BXC development.</p>

**Theme: Design Parameters**

Multiple submitters raised concern with the change of design from the fully enclosed palletized intermodal operation to the aggregate and muck away freight operation on an open site.

**Officer Response:**

Market demand studies commissioned by Network Rail in 2015 and 2016 following the 2014 Section 73 Planning Permission for the BXC Development have demonstrated that the demand for an intermodal rail freight facility is no longer viable and that there is now a strong local demand in North London for a facility to import aggregates and export construction waste via rail. The outcome of these market demand studies along with recommendations made by Network Rail and Freight Operating Companies have informed the Council's strategy for the delivery of the Rail Freight Facility as part of the wider Thameslink Station project within the Brent Cross Cricklewood regeneration scheme.

**Theme: Air Quality**Health risks

Multiple Submitters raised concern with the health risk of local residents, workers and children in the nearby school as a result of the locating the RFF near sensitive land uses. Links to increase of dust and dirt into the air as a result of the operation of the development were raised.

Pollution

There is concern the proposed development will be adding significant levels of pollution to an area that often reaches illegal (record) levels of pollution and therefore adding additional dangerous levels of toxicity to the area. Additionally, some feel that proposal does not align with the Mayor of London's Clean Air Strategy.

Further information was requested regarding the air quality impacts as a result of the development proposal, as the application appears to contain contradictory information.

Dust mitigation

Further documentation was requested to show evidence of appropriate dust suppression systems that will control dust and odours generated by the operation of the RFF. Residents raised concern with the dust and debris released into the air as a result of the operation of the site (including trains accessing the site and the HGV transporting the material).

Noise

Multiple submitters raised concern with the impact of noise on local residents and workers in the area as a result of the ongoing operation of the site (including trains accessing the site and the HGV transporting the material). Additionally, some feel the noise barriers and noise bund proposed in the development application do not have appropriate attenuation specifications for the size of the development in a residential area.

There is concern with the noise and hours of operation of the facility, especially possible vibrations from the trains and lorries on surrounding residential houses.

Light pollution

Numerous submitters have raised concern with the light pollution for residents living near the rail way tracks that may be exacerbated as a result of increase rail activity during the production of the rail freight facility. Further information was requested on the impact of the 24/7 security lights on the surrounding neighbours.

**Officer Response:**

A modelling assessment has been undertaken to assess the impact of traffic generated by the scheme on local air quality. The findings indicate that in comparison with the previous occupiers and use of the site, the scheme will have a negligible impact and potential to have a beneficial impact. This is as a result of the reduction in traffic generated by the site, and the use of EURO VI compliant Heavy Goods Vehicles for the proposed RFF, which have much lower emissions than older vehicles. In line with Policy 7.14 of the London Plan, an assessment of the air quality neutrality of the site was also undertaken. This found that the scheme achieves air quality neutrality (i.e. it has lower emissions than the calculated benchmarks for a site of this size).

A landscape bund (5.0m high) topped with a 5.1m acoustic fence will protect the Railway Terraces from noise impacts. This bund will be landscaped on the side facing the Railway Terraces. In addition to the fence at the southern end of the site, Brent Terrace will be protected by the 5.1m high acoustic fence on the eastern boundary adjoining the mainline railway. At the north-west corner Fellows Square is protected by an acoustic fence. These units have been designed with mechanical ventilation and suitable glazing and construction standards to address existing noise from the railway.

The site will have complete coverage by 'rainguns' which spray water to ensure that all particulate is contained within the site. This will operate automatically and with manual override controlled under best practice set out in the management plan.

Structures are proposed on the northern and southern most plots to assist in controlling noise emissions and provide a visual screen to the operations closest to the residential areas.

## **Theme: Transport**

### General

There is overall concern with the capacity of the surrounding roads (especially A5 and Edgware Road) to take on the impacts the traffic increase that will result from the development proposal.

### HGVs

Multiple submitters raised concern over the increase of high volumes of HGV vehicles into an already congested and polluted area. Submitters also highlighted their concern that the surrounding roads are not built to withstand the extra weight of the HGVs which could lead to further damage to the roads and possible damage to cars and cyclists trying to navigate the damaged roads. Additionally, submitters highlighted that the roads are not design to be wide enough to deal with the increase of the HGVs.

Further modeling is requested on the following:

- Illustration that HGVs will not use Dollis Hill Lane, Claremont Road, Walm Lane, Cricklewood Lane and other surrounding roads as a means of avoiding Edgware Road.
- Traffic Movement of HGVs entering and exiting the site that details the knock-on effects to the surrounding roads.
- Impact of the structural design of the surrounding houses as a result of the additional HGVs passing the residential properties.

### Intersections

Submitters have raised concern that development application does not take into account the impact of the new residential apartments (Fellows Square Development) and the Brent Cross Redevelopment to be built nearby when assessing the traffic impacts on the A5 (but also the A406, M1 and A1 junctions). There is concern that collaboratively the development proposals surrounding the site in addition to the proposed RFF will significantly exacerbate the current

traffic issues at those intersections.

### Safety

There is concern that any increase of traffic in the area will result in safety issues. The following key issues were raised by submitters:

- The increase of HGVs on the surrounding streets will increase the risk of accidents for cyclists.
- Major concerns were raised surrounding pedestrian safety as a result of increased HGV vehicles on the main streets.
- Impact on the safety of the infant school with large HGVs coming and going near school grounds.
- Increase in traffic volumes will increase the risk of accidents to the residents/children using bus stops at either side of the Dollis Hill land and A5 junction.
- Concern with the extra traffic impacting on the function and visibility of the streets, especially the main intersection in Cricklewood (Chichelle Road/Cricklewood Broadway/Cricklewood Lane).

### Traffic Increase

Increase in traffic as a result of the RFF is of significant concern to the local community due to impact on an area that already results from high congestion. There is concern that the additional traffic will not add further constraint to an already saturated road network. Additionally, the local side roads surrounding the A5 (and Edgware Road), as well as local side roads around Cricklewood Broadway, are currently used by commuters to bypass traffic. Any additional traffic will increase the traffic pressures on the local side roads.

Further documentation was requested to ensure that the traffic impact studies have factored in the surrounding developments such as Fellow Square and the development in BXC, plus any future major developments that may occur.

### London Bus Depot

Numerous submitters raised concerns over the increase of traffic adding to the additional traffic that the London Bus depot across from the site is causing on a daily basis. Including the impacts of the entrance to the site being close to opposite the entrance to the Bus Garage creating a potential gridlock situation with large vehicles attempting to enter both sites simultaneously.

### Congestion

Multiple submitters raised concerns on the impact of extra vehicles on the already heavily congestion A5 (and Edgware Road) especially during peak times. Additionally the additional congestion on Kilburn High Road which may result in carry on effect on the local businesses and residences along that road.

### Access

It has been suggested that no rail freight trains should be accessing the facility from the south and that the trains accessing the facility should be isolated and arrive and depart from the north of the site. This is to mitigate potential impacts on the terrace houses associated along the railway.

### Public Transport

Numerous submitters have raised concerns with the negative impact on the local public transport (buses) including the routes 16, 32, 189, 226, 260, 266, 316, 332, 460.

### Infrastructure

There is concern that the proposed development (and recent development in the area) has not

included infrastructure upgrades, resulting in significant numbers of people and vehicles in the area using the same infrastructure. It is suggested that road infrastructure improvements should be addressed through this development proposal.

#### Cycling

Numerous submitters have raised concerns that there are no cycling designated path designed into the development application. Additional HGVs on the A5 with its current design will endanger the cycles and potentially discourage people from using cycling as a form of commutable transport.

#### **Officer Response:**

A maximum of 452 HGV movements will be generated by the development (226 in and 226 out) and this will be controlled by planning condition.

Traffic surveys at the site when it was occupied by EuroStorage showed 24-hour flow from the site as 1,596 vehicle movements. The proposed development has agreed to limit the HGV movements to a daily cap of 452. This is a considerable reduction in overall traffic demand on a daily basis.

Capacity analysis has been undertaken in a robust manner, with sensitivity tests of even 20% of the daily demand from the RFF using the site in one hour showing that there is no detrimental queuing issues on the A5. Wider strategic highway analysis considers the impact of all the Thameslink and Brent Cross Cricklewood proposals, and the analysis shows that the impacts of the wider development is mitigated.

Furthermore, the RFF will act as a strategic facility that will reduce long distance lorry movements to and from aggregate/construction waste sites across Greater London. For each train that will use the new facility, 75 HGVs are removed from the wider network.

#### **Theme: Monitoring and Enforcement**

There is concern that Barnet Council has lacked appropriate enforcement of previous conditions attached to planning permissions (such as mitigation factors – water to reduce dust) and appropriate management of assets and leases in the BXC area (Donoghue Waste Transfer Site was mentioned). Further evidence is requested to be provided on the monitoring and enforcement strategy for ensuring any conditions applied to the decision notice will be carried out appropriately by the developer.

#### **Officer Response:**

DBC 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. A condition is imposed to require the final plan to be submitted and approved by the LPA and to ensure that the approved plan is then implemented and adhered to by DBC and any site tenants.

DBC has committed to a real time monitoring scheme with a website so that residents are able to view air-quality and noise data. The management plan will identify the Site supervisor to enable community contact and ongoing engagement. In addition to best management practice, air-quality will be controlled through rain guns to dampen any particulates and HGVs will be of the highest environmental control under Euro VI. HGV reversing sounds will be white noise which is standard practice in a location near to residential properties. The operating hours will be 7am – 7pm Monday to Fridays, 7am – 2pm on Saturday and no working on Sundays. This will be controlled by condition.

Other conditions will set noise standards, air quality standards, and will ensure ensuring vehicles are washed and cleaned appropriately prior to leaving the site.

In addition to the Planning Application process, the site requires an Environmental Permit for the Environment Agency to operate. This will include regular inspections to ensure compliance with the terms of the Permit.

**Theme: Public Engagement**

Numerous submitters have raised concern that Concerns that not all residents have been appropriately consulted throughout the process, especially around new plans submitted. Additionally, there is concern that local resident's objections are not being appropriately considered throughout the development consultation process.

**Officer Response:**

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 September and December 2017. This is detailed in section 7 of this committee report.

**Theme: Other**

Conflict of Interest

A concern was raised by a submitter that a conflict of interest exists with this application due to Barnet Council being a joint applicant. Additionally comments were made on the relationship between the Barnet Council and the developer.

**Officer Response:**

The Council is the joint applicant with DB Cargo for the application. This is In July 2017 the Council approved, through a Delegated Powers Report of the Council's Chief Executive, entering into a legal agreement with DB Cargo (UK) Limited following Heads of Terms that were approved in February 2017. Under the terms of the agreement DB Cargo will deliver the Rail Freight Facility and operate it at its own cost subject to progressing and submitting a joint planning application. If the RFF is delivered in the form approved by the Council and in accordance with the agreed programme, the Council will not need to implement compulsory purchase powers pursuant to CPO3 to acquire DB Cargo's land. Conversely if the terms are not met, providing the CPO is confirmed, the Council will have the ability to acquire DB Cargo's interest in the land and step in to deliver the RFF.

Table 2 – Summary of Public Responses

No.	SUMMARY OF PLANNING OBJECTIONS
<b>Principle of the Development</b>	
<b><i>Principle of the Development – General Comments</i></b>	
1.	Further information is requested regarding the hours of operation, volume of material to be processed by the site and the use of the land as the application appears to contain contradictory information.
2.	The Planning statement details that the <i>proposed development is required to replace the existing supplemental strategic freight site located on the east side of the Midland Mainline [sic] railway. It is operated by the North London Waste Authority (NLWA).</i> Further justification is sought as to why the facility is required to be replaced on the site proposed.
3.	It is unclear why the application focuses on 452 HGVs a day and two trains, given that DB Cargo envisaged three trains a day and 800 HGVs solely for aggregates and that the aggregates business is a low-margin one dependent on high volumes.
<b><i>Principle of the Development – Land Use</i></b>	
4.	Strongly oppose to the use of railway land for transportation of aggregates and non-putrescible waste.
5.	Council needs to acknowledge the existing land use rights and any residential uses should be separated from industrial uses such as the RFF.
6.	As a designated conservation area, the development should be ensuring it does not disturb the 100 year old foundations.
7.	The land would be much better used as a depot for the proposed West London orbital line (WLO). In the WLO report part-financed by Barnet council, this site is suggested as a convenient site for a WLO depot, given the shortage of rolling stock depot sites in the London area.
<b><i>Principle of the Development – Location</i></b>	
8.	The development proposal for an industrial use is not appropriate due to the site's proximity to residential uses (and associated uses such as community and commercial uses).
9.	A development of this scale should be located with direct access to both orbital and radial roads (for example A41 or A1) of sufficient capacity to absorb the high volume of HGVs without causing congestion and consequent disruption of public transport services and high levels of pollution.
10.	The area is already overdeveloped and therefore is an unnecessary infrastructure proposal that due to the size should be located elsewhere.
11.	The proximity of the proposed development to the schools in the area is of concern to the local residents due to health and safety reasons. The proposal will also cause noise disruptions for the teaching and activities in some of the surrounding schools.
12.	The development proposal needs to take into consideration the proposed high end apartments in the area which will be directly impacted.

13.	The site is located near the children's playing fields and will cause health issues if the proposal excretes more pollution (dirt and dust included) into the air they will be breathing.
14.	Further justification is sought on how the area will be enhanced by the development and operation of the RFF.
15.	Cricklewood already suffers from dust and pollution caused by the rubbish yard next to the post office. This development proposal will add excessive amounts of pollution and congestion to an area already over its capacity. The location of the development needs to be reconsidered to a site further out of town.
16.	House prices will be impacted by this development.
<b><i>Principle of the Development – Community</i></b>	
17.	The liveability of the area will decrease as a result of this development proposal due to increased traffic and increased dust and noise emissions.  Some submitters also highlighted the application will result in negative effects on the health and wellbeing of the residents.
18.	There is concern that the RFF will add extra damage and nuisance to the surrounding area that Claremont Road business is currently generating.
19.	The suggested benefits of the development proposal do not outweigh the negative impacts this development will have on the local residents. There is concern that the impacts on the residents have not been appropriately considered by the Council.
20.	The historic houses in the area are not built to the same modern standards and therefore more sensitive to noise and dust that the development proposal will produce. The structure of the houses would be at risk of substantial damage as a result of the planned increase in rail freight activities and in some cases the extra HGV on the road.
21.	The studies in the report have failed to investigate the impact of the use of the site in close proximity to 19th Century dwellings and therefore the relevant British Standards have not been correctly applied.
22.	The proposal is in too close proximity to the Railway cottages / Terraces where young families reside for safety and liveability aspects.
23.	There is concern that the proposed development will send back the efforts that the community have gone to in improving and investing in the area. Particular concerns were raised around the community investment into Cricklewood, including adding a garden area near the station and investments into signs and shop frontages in Broadway.
24.	There is concern on the repercussions to the Cricklewood area as a result of the development proposal. These include adding additional congestion and pollution to the area resulting in impacting the livelihoods of residents and businesses.
25.	The proposal will have detrimental impacts on the local residents resulting in increased commuting times and additional traffic in the area.
26.	The drilling for a well may have an impact on the water table which may cause subsidence in the railway terraces, especially to those cottages directly facing the development such as my own.

27.	The weight from the heavy freight trains could be detrimental to the foundations of the terrace houses causing possible subsidence
28.	There has been no assessment of the likely effect of 21st Century trains on the foundations of 19th Century cottages. The Terraces cottages shake when a freight train occasionally comes past. What assessment has been carried out with respect of the physical / structural impact to the terraces. BS 7385-2: Evaluation and measurement for vibration in buildings should be used as a guide for evaluating the impact of additional rail freight.
<b>Principle of the Development – Overall Regeneration Scheme</b>	
29.	This development application does not align with the overall principles of the regeneration scheme which is planned to bring more residential homes and facilities into the Brent Cross area and more attraction to the whole area as a whole.
30.	The Freight hub was not a part of the development plan for new houses, flats and a school in the Cirklewood location that has been sold to the public by Brent and Barnet councils.
31.	The development application appears to have no relation to the original scheme that was approved and therefore will result in detrimental effects on the locality to which it is being proposed.
32.	With the development of Fellow Square and the regeneration of BXC this freight facility does not appear to suit the surrounding context.
33.	This development will degrade the area and significantly impact the wealth of the area through noise and the impact of HGV through the local area.
34.	The Brent Cross Regeneration Development project is accommodating to pedestrians and commuters, this development application does not align with that.
35.	Further information on the jobs that will be created by the overall scheme and how this benefits Barnet and Cricklewood.
36.	The development proposal is not a positive regeneration option.
<b>Design Parameters</b>	
37.	The storage of aggregates should be covered at all times and not in an open facility design.
38.	The new facility will not be contained in any form of structure or wind break.
39.	Raised plant such as conveyors should be specifically precluded.
40.	Plant should avoid the possibility of contact with resonant containers.
41.	Storage of cement or other aggressive or dangerous materials should be precluded.
42.	It was stated that “Further design work has been carried out since the last public events to investigate whether the new Rail Freight Facility could be fully enclosed” however, there is no justification as to why it is not.
43.	Landscaping, dust suppression and acoustic fencing will have no effect of the trucks as they pass to and from the site.
44.	Under the S73 permission the container freight was an enclosed build. This drop in

	application proposal is now for aggregate and muckaway freight on an open site, which is outside the parameters of the s73 permission. Although there is documentation that the change to the original permission is due to economic reasons, the new design will have detrimental effect on the surrounding environment. It is noted that mitigation factors have been discussed and some changes made however noise level and air quality will still be detrimental to the residents living near the site.
45.	The consented scheme was a fully enclosed palletised intermodal operation under the control of one operator. The current proposal is an open aggregate operation which is essentially noisier and will add more dust as is not contained by a building. The sources for pollution are greater and the opportunities to ameliorate it are reduced.
46.	Effective acoustic screen to protect the residential neighbourhood from noise pollution and health risks.
47.	The car park does not specify use and layout. This needs to be confirmed as part of the application as additional vehicles using this area will have a detrimental impact in terms of noise and air quality.
48.	Storage buildings should have roller shutters on proximity sensors that close when not in use.
49.	Restrictions need to be put in place for 'no left turn' when exiting the site.
50.	The proposed plans for a car/lorry park do not show details e.g. bays or turning points.
<b>Amenity Impacts: Air Quality</b>	
<b><i>Amenity Impacts: Air Quality – General Comments</i></b>	
51.	There is already evidence of dust and dirt collected from the roads on surrounding residential houses close to the site (on the walls, doors, gardens etc.). The development proposal will only exacerbate the situation.
52.	The <i>AIR_QUALITY_APPENDICES-3839128</i> only takes into account the vehicle movements during construction (47 per day) not operation (up to 800 per day). This makes its results at best meaningless, at worst deceptive.
53.	The air quality study showed that the air quality exceeded limits currently and so will not make matters worse. This is a poor level to aim for. The air quality should be brought within safe limits.
54.	The overall air quality of the area will be determinately affected if the development proposal is approved.
55.	There is concern from surrounding residents of the impact the dust and air pollution will have on the vegetable gardens (and in one case bees). The application needs to demonstrate there will be no serious impact as a result of the facility on the food grown in surrounding residential gardens.
56.	As a resident who has lived in the area since 1987, the air quality changes are significant with a number of industrial and retail development along A5 (Edgware Road) and the gradual increase of HGV along the road. This development will add to the poor air quality.
57.	Negative Air Quality Pollutant increase will mean an increase in PM2.5, which is already high in the area.

58.	The proposal is in direct conflict with the Mayor's existing Clean Air Strategy and with the (Draft) Environment Strategy and does not consider the impact on the health of the local population in both existing and proposed residential areas. The proposal will result in an unhealthier environment for residents and Londoners.
59.	The development application does not align with the Mayor of London's warning on London's soaring levels of air pollution.  See:  <a href="https://www.theguardian.com/environment/2017/sep/27/london-issues-red-alert-for-extremely-high-air-pollution">https://www.theguardian.com/environment/2017/sep/27/london-issues-red-alert-for-extremely-high-air-pollution</a>
<b>Amenity Impacts: Air Quality - Health</b>	
60.	There is concern with the health risk of local residents, workers and children in the nearby school (and local children) as a result of the locating the RFF near sensitive land uses. Links to increase of dust and dirt into the air as a result of the operation of the development were raised by submitters
61.	The extra lorry movements and traffic that will result from this development proposal are likely to cause harmful emissions into an area already suffering from poor air quality.
62.	Health risks relating to air quality, such as asthmatic conditions such as Atopic Triade (and also chronic obstructive pulmonary disease) and in one case lung cancer, were raised by local residents as a concern that will be exacerbated by exhaust fumes coupled with dry particulate matter being thrown into the air and increased dust pollution from the aggregate centre.
63.	Risk Assessment modeling regarding the health impacts of this development should be made available to the public.
64.	The expected noise increase in the area as a result of this development application will have detrimental impact on the mental health of local residents.
<b>Amenity Impacts: Air Quality - Dust</b>	
65.	Further documentation needs to be included as part of the development application to show evidence of appropriate dust suppression systems that will control dust and odours generated by the operation of the RFF. The current dust suppression system is just sprays that only operate under high dust and therefore not adequate for the scale of the RFF.
66.	The development proposal will result in unacceptable dust emissions that will add extra pollutants to the surrounding area.
67.	The development proposal does not have sufficient dust control during the train removal and storing process.  As stated in the Air quality appendices the drop heights should be minimised and fine water sprays should be used when dumping into rail cars.
68.	The current recycling site on the east side of the railway currently exhibits dust that can be discerned in the air.
69.	There are concerns that documentation on the dust particles that will be generated as a result of this development application has not been made available public.
70.	Residents are requesting reassurance that no asbestos will be released during

	operation of the site.
71.	Further information is required on the dust reducing measures for managing off site in adjacent streets and residential areas.
72.	Documentation has indicated that "approximately 57% of the time mean-hourly winds do not exceed moderate levels" however further information is sought on the other 43% and what effects that will have on the local neighbourhood.
73.	Preventative measures need to be put in place to stop the dust and debris being transported will not effect the local environment
74.	Dust suppression does not extend far enough south to cover the HGV turning head.  At present these vehicles will manoeuvre outside the reach of the dust suppression system. Also, there is no dust suppression where the material is dumped into the trains. This is not acceptable or best practice. Design should be revised so that LBB can assess the full impact.
75.	No attempt is made to quantify the dust pollution from stockpiles and activities on the site and from vehicles in transit. There is no indication given of what the minimum figure is.
<b>Amenity Impacts: Air Quality - Pollution</b>	
76.	The pollution (noise, traffic and dust) generated by P.B Donoghye is already affecting the area. This development proposal will add unacceptable additional amounts of pollution to the area.
77.	Barnet has designated the A5 from Staples Corner to Cricklewood Lane as a focus area for air quality improvement; the proposed development application will make this area worse.
78.	The pollution generated by the proposal, especially through extra vehicles on the road, will be detrimental to the area.
79.	The negative impacts of the additional levels of pollution on the young children who live or study in the area were raised by submitters.
80.	The proposed development will be adding significant levels of pollution to an area that often reaches illegal (record) levels of pollution and therefore adding additional dangerous levels of toxicity to the area. This is not acceptable in the area.
81.	The expected additional traffic on the roads as a result of this development proposal will add additional congestion to the area which in result will have HGVs causing a stop-start progress which would undoubtedly cause dangerously high levels of airborne pollution, in the already somewhat polluted and densely populated area around Cricklewood Broadway.
82.	Residents are requesting reassurance that the HGVs (lorries) using the site will be compliant to the most modern emissions standards - not applicable to the =A3200 ULEZ charge that goes to TfL and the borough sees no direct revenue nor benefits in the short to medium term.
83.	Barnet council has made a commitment to reduce the levels of pollution in the area. This development proposal will be in direct opposition of this commitment.
84.	Barnet council should be taking measures to reduce the pollution levels in the area and

	not adding volume to those levels.
85.	The pollution levels indicated in the application will most certainly be worse as a result of upkeep of diesel lorries and the practicality of the dust covers on the lorries not always being tied down tightly.
86.	Nitrogen Dioxide levels in Gratton Terrace were recently monitored over a 16-day period and recorded an average level of 41.602 µg/m <sup>3</sup> . This exceeds the EU annual average legal limit of 40µg/m <sup>3</sup> . For a clearer picture a more sustained study would be needed but it is clear that this neighbourhood is already heavily polluted. I should point out that Gratton Terrace itself is a very quiet road. The monitoring took place 20-30 yards from the A5, at a site screened from it by a building (Burlington Parade). I am gravely concerned that the HGV and rail locomotive traffic which accompany this development will push Nitrogen Dioxide levels even higher.
87.	Studies on the Air Pollution levels expected as a result of this development should be made available to the public.
88.	Contradicts Barnet council's commitments to "reduce the impact from transport and improve air quality" as set out in the London Borough of Barnet Air Quality Action Plan 2017-2022.
89.	Residents associated along the railway tracks and in the surrounding terrace houses are concerned of the pollution increase as a result of transporting the aggregates and non-putrescible waste to and from the rail freight facility by rail.
90.	Policy 7.14 of the London Plan requires planning decisions to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within AQMAs; be at least 'air quality neutral'. How is this achievable?
<b>Amenity Impacts: Air Quality – Noise</b>	
91.	Design criteria should be made to ensure that the RFF mitigates noise impacts on the surrounding residential houses.
92.	The development will result in unacceptable noise impacts upon local residential areas (and those who work in the area), especially as a result of increased traffic.
93.	Residents associated along the rail track are concerned for the noise level increase as a result of the activity of the rail freight facility.
94.	There is concern with the noise and hours of operation of the facility, especially possible vibrations from the trains and lorries on surrounding residential houses. Night-time, evening and weekend work should be precluded.
95.	The noise barriers proposed in the development application do not have an attenuation specification. This should be required as part of the design. The barriers will degrade over time and therefore a certain level should be required in perpetuity (see: <a href="http://assets.highways.gov.uk/specialist-information/knowledge-compendium/2009-11-knowledge-programme/The_acoustic_durability_of_timber_noise_barriers_on_Englands_strategic_road_network.pdf">http://assets.highways.gov.uk/specialist-information/knowledge-compendium/2009-11-knowledge-programme/The_acoustic_durability_of_timber_noise_barriers_on_Englands_strategic_road_network.pdf</a> )
96.	There is concern over the noise that the construction of the site will generate to an area already heavily impacted by noise.

97.	The projections for noise impact are inadequate and the relevant calculations in respect of noise mitigation measures are absent or inadequate (where present). Further, it is unclear what, if any, account has been taken of the impact on noise pollution (and proposed mitigation) of the rail tracks having been raised 1.5 metres above their previous levels.
98.	Trains approaching the site from the South should have noise/vibration mitigation controls placed on them (until they reach the Railway Yard) to ensure that the terraces near the track are not impacted.  Trains should not be coming in from the South.
99.	Noise pollution has been linked with increased cardiac and stroke risk in London (see <a href="http://www.bbc.co.uk/news/uk-england-london-33255542">http://www.bbc.co.uk/news/uk-england-london-33255542</a> ).
100	Both end bay plots with all operations should be fully enclosed in acoustic cladding and not just partly covered/open sheds.
101	The noise bund being formed to the railway cottages has a large gap in it for what appears to be hammer head to turn vehicles. This is right next to the flats on Dorchester court which would render the noise bund a pointless token gesture. Noise will inevitably funnel through this space and up through the terraces unless the bund is fully extended around and up to the self-storage building at the very least.
102	HGV turning area to nearest residential units is 35m and is unacceptable. The bund does not cover this area.
103	A longitudinal cross section (north to south) needs to be drawn to include the northern part of the terraces, to better understand the levels of the site. The acoustics of the site are effected by the topography, including the impact on the railway terraces.
104	The assessment for the residential receptor MP2 appear to be based upon 105 minutes of measurement. It standard industry practice that a minimum of 24 hours of measurement is used and current standards encourage even longer surveys to consider the full range of background sound levels experienced at a receptor.
105	The background noise assessment provided does not appear to consider any of the permissible penalties provided in BS 4142:2014 which can affect the outcome of the assessment. This can further increase the activity noise by up to 12dB when establishing a noise rating level.
<b><i>Air Quality – Light Pollution</i></b>	
106	The applicant needs to demonstrate how the light pollution for residents living near the rail way tracks will not be exacerbated as a result of increase rail activity during the production of the rail freight facility. Residents have raised issues on the current level of light entering the houses during the night to which an increase would make the houses almost uninhabitable.  Industrial security light on allnight will severely impact the surrounding neighbours.
107	The site will have flood lights on between 0600 to 2300 and 24 hrs along the NR PWay route. The lights are 12m high and will cause a serious amount of unnecessary light pollution. Please reconsider this design
<b>Environment</b>	

<b>108</b>	More information is to be provided to address the concern on the local ground water table as a result of the RFF (including from dust emissions- traffic).
<b>109</b>	There is concern with possible erosion on the surrounding land due to the development proposal using the spring water as a water supply for their sprinkler system
<b>110</b>	Any sort of well drilling must be accompanied with a geotechnical assessment of the water demand required and the effect on local ground conditions particularly with the clay substrata in the area and shrink ability potential.
<b>111</b>	One of the mitigation factors discussed is using water to dampen the dust on the wheels of the trucks. The intention is to use water from the natural spring on this site, the implication being that this is ecologically sound practice. An assessment of the effect of using this spring water on the water table does not appear to have been completed.
<b>112</b>	The development proposal should include more green spaces and not a development that will create more environmental harm to the area (through congestion and pollution).
<b>113</b>	The development proposal will cause significant environmental harm to the area.
<b>114</b>	The costs verse environmental impact needs to be properly addressed.
<b>115</b>	The development proposal fails to protect and enhance the adjoining conservation area.
<b>116</b>	Issues were raised from the community regarding the contamination within the local area that may occur as a result of this development application.
<b>117</b>	The development proposal will be devastating for the wildlife and local ecosystem including a bat corridor and a number of threatened species.
<b>118</b>	The proposed removal of freight along the train track through Gladstone Park will impact on the park, quality of life of people living near the rail line and community members enjoying the park.
<b>119</b>	Suggesting use of a local spring without a complete examination of the implications for neighbouring properties sharing the water table is not acceptable.
<b>120</b>	Kara Way Playground will be directly impacted by the dust and noise pollution.
<b>121</b>	The Invertebrate Survey by Russell Miller (Arboriculture & Ecology) included in the developers documents details 131 species: over 30% local, scarce or rare. This includes a number of pollinators and rare bees.  The author of the report states that this site is of greatest importance to invertebrates.
<b>Transport</b>	
<b><i>Transport - General</i></b>	
<b>122</b>	It has been raised that the TFL have identified the A5 as being over capacitated in traffic and an area of poor air quality. There is concern that this application will only add more pressures to the A5 and make the situation worse.
<b>123</b>	The high volume of trucks and other traffic along local roads (such as Edgware Road) causes safety issues for pedestrians using those roads and residents accessing properties (and children accessing schools) and also results in extended journey times during morning peak.

	The submitters would like to know what traffic management strategy is in place to deal with these issues.
<b>124</b>	TFL needs to ensure traffic along the whole of the A5 flows well and to place pedestrian crossing lights on the A5 at the exit from the site. This should be part of revision of all traffic and pedestrian lights on the A5 between Cricklewood Lane and Staples Corner.
<b>125</b>	The overall roads capacity to take on the impacts of this development application are of concern to local residents.
<b>126</b>	Further information requested on what new roads will be developed to mitigated the impact on Edgware road this development application will incur and therefore new first access onto M1 and North Circular are needed.
<b>127</b>	Further explanation is requested on the impact of emergency services accessing the area and A5 with the increase of traffic this development application will cause.
<b><i>Transport – HGVs (lorries)</i></b>	
<b>128</b>	There is concern over the increase of high volumes of HGV vehicles into an already congested and polluted area.
<b>129</b>	The structural design of the surrounding houses will be impacted by the vibrations of the additional HGVs and the freight trains.  HGV's have detrimental impact on residential houses to which the responsibility of cost of repair falls on the owner of the house.
<b>130</b>	The proposed increase of HGVs will have direct detrimental effects on Edgware Road, Cricklewood Lane, Westbere Road and Minster Road.
<b>131</b>	Further information is requested that detail the movements of the HGVs to ensure they do not use local roads networks.
<b>132</b>	Further studies need to be done to assess the impact of HGV vehicles on the wear and tear of the roads.
<b>133</b>	There is concern with the level of dust and air quality for the area that will be impacted with up to 800 HGV movements per day i.e. 2 every minute transporting aggregate in addition to offloading, storage and reloading of aggregate and building materials within the site.
<b>134</b>	Traffic modelling needs to ensure that the HGVs will not use Dollis Hill Lane, Claremont Road, Walm Lane, Cricklewood Lane and other surrounding roads as a means of avoiding Edgware Road.
<b>135</b>	HGV's should only be directed through wide easy flowly lanes and therefore not be shifting gears trying to muscle their way through single lane local traffic.
<b>136</b>	There is concern on the surrounding roads are not built to withstand the extra weight of the HGVs. The quality of the roads in the area is rapidly deteriorating. The impact of extra HGV on these roads will increase the situation.  Residents identified the knock on effect of damaged roads on vehicles and cyclists for example potholes causing damage to tyres and wheels of cars.
<b>137</b>	There is concern on the HGVs entering and exiting the site movements impacts of the traffic. Northbound HGV queuing to enter will block the northbound A5 when two or three buses are also parked at the bus garage bus stop while they change drivers. The

	<p>A5 must be widened south of the entrance to the freight facility to produce an extra lane, to ensure northbound traffic is not blocked.</p> <p>Northbound traffic on the A5 is often stationary, so HGV attempting to turn right out of the freight facility will block the traffic completely.</p> <p>Traffic lights, which could be part-time during opening hours, and a yellow box are essential to prevent right turners into and out of the site from blocking traffic.</p>
<b>138</b>	The roads are not designed to be wide enough to deal with increase of HGVs.
<b>139</b>	Adding a greater volume of HGVs to a road network already clogged with busses and vehicular traffic would be in violation of all highways policies in the UDP and NPPF.
<b>140</b>	A weight restriction has already had to be introduced on residential roads in Dudden Hill, Dollis Hill and Maesbury wards to deal with skip lorries using residential roads as a rat run. Measures must be introduced to stop this happening, for example funding via s106 agreements for cameras at the entrance to all residential roads off the A5 and the necessary Traffic Management Orders to stop the HGVs.
<b>141</b>	Traffic monitoring is based on hypothetical situations and doesn't accurately reflect the true situation.
<b>142</b>	<p>Calculations of vehicle emissions appear to be made solely on the basis of low numbers of aggregate-carrying HGVs</p> <p>They are not compared with the true baseline, predicted levels of pollution without the road/rail facility and thus they conceal that the effect of the development will be to deprive of us the gains that will be made elsewhere</p>
<b>143</b>	This development assessment needs to take into account the impact of the new residential apartments (Fellows Square Development) and the Brent Cross Redevelopment to be built nearby when assessing the traffic impacts on the A5 but also the A406, M1 and A1 junctions. Collaboratively these proposals will significantly exacerbate the current traffic issues on those intersections.
<b><i>Transport – Intersections</i></b>	
<b>144</b>	The development application needs to show evidence of no negative impacts on the Stapes Corner intersection as a result of extra HGV's on the road.
<b>145</b>	The study of the intersection is based on the vehicle movements with a 'flat profile', however as stated in the report a train is unloaded in 2 - 3 hrs. Therefore, the traffic load will be subject to significant peaks. Nevertheless, the study demonstrates Level of service on the intersection in general of up to E on weekends and D on weekdays, which is unstable. This will mean significant delays if there are any issues. The traffic impact is not considered on surrounding areas and only on that intersection.
<b><i>Transport – Safety</i></b>	
<b>146</b>	There is concern that an increase of HGVs on the roads surrounding the site will lead to an increase in road accidents (Cricklewood Land and Broadway were mentioned due to the high numbers of accident's already evident on those roads).
<b>147</b>	<p>There is concern that any increase of traffic in the area will result in safety issues. The following key issues were raised by submitters:</p> <ul style="list-style-type: none"> <li>- The increase of HGVs on the surrounding streets will increase the risk of</li> </ul>

	<p>accidents for cyclists</p> <ul style="list-style-type: none"> <li>- Major concerns were raised surrounding pedestrian safety as a result of increased HGV vehicles on the main streets.</li> <li>- Impact on the safety of the infant school with large HGVs coming and going near the school grounds.</li> <li>- Increase in traffic volumes will increase the risk of accidents to the children using bus stops at either side of the Dollis Hill land and A5 junction.</li> </ul>
<b>148</b>	The inside lane on the A5 from Lidl towards staples corner especially, is marred and rutted mostly by buses, making cycling a precarious act, as well as drivers changing lanes at last minute or slowing down to navigate the ruts can only be made worse by an increase in use from vehicles with a SWL in excess of buses. The development application needs to illustrate the traffic improvement provisions and the infrastructure improvements that will be addressed through the proposal.
<b>149</b>	There is concern with the extra traffic impacting on the function and visibility of the streets and making it dangerous for residents. The main intersection in Cricklewood (Chichelle Road/Cricklewood Broadway/Cricklewood Lane) is already a dangerous junction for pedestrians to cross; the excess of traffic this development will cause will increase the risk of harm in this area to an unacceptable level.
<b><i>Transport – Traffic Increase</i></b>	
<b>150</b>	Increase in traffic as a result of the RFF is of concern to the local community due to impact on an area that already results from high congestion.
<b>151</b>	The development application does not demonstrate how the additional traffic will not add further constraint to an already saturated road network.
<b>152</b>	Further details are requested on the traffic impact assessment that was carried out on the Edgware road as a result of the development application.
<b>153</b>	The traffic impact studies need to factor in the surrounding developments such as Fellow Square and the development in BXC, plus any future major developments that may occur.
<b>154</b>	The streets are too narrow to accommodate the additional volume of traffic that would be generated by the proposed development (Cricklewood Lane and Walm Lane were specifically addressed).
<b>155</b>	Further work needs to be done by the Council on decreasing traffic in this area not adding to its already constrained situation.
<b>156</b>	The traffic generated by the development proposal will result in a negative knock on effect on surrounding areas such as Staples Corner and Willesden Green and associated local roads. Further assessment is required on the impact of this development on these road networks.
<b>157</b>	The local side roads surrounding the A5 (and Edgware Road) 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.
<b>158</b>	Illustration of the amount of excess traffic caused by the street cleaners (as a result of the excess dust caused by the facility) needs to be demonstrated and appropriately mitigated in the road impact assessments for this development proposal.
<b>159</b>	The turning circle at Cricklewood lane(A407)/Claremont Road junction is hazardous enough with large vehicles turning as it is. Cricklewood Broadway is effectively single

	lane and congested at all times with all the buses coming out of the bus garage. Please look at the traffic levels on Claremont Road at 7am every morning when Donoghue HGV's all come out of the sidings and travel north to the Cricklewood Lane.
<b>160</b>	Traffic modelling needs to review the impact of the HGV movements if road works on the junction of Dollis Hill lane/A5 and the Brent Cross Flyover are taking place. The modelling needs to ensure that the 800 trucks will not be using local roads to divert any predicted road works on those two junctions.
<b>161</b>	The development should be prioritizing rail as the means to transport goods and not HGVs.
<b>162</b>	The increased levels of traffic that will result from this development will have a knock on effect both in congestion, noise and dust, impacting a wider geography than the area this site sits in.
<b>163</b>	The local side roads Cricklewood Broadway in particular Temple road are currently used by commuters to bypass traffic. Any additional traffic, especially HGVs, will increase the traffic pressures on the local side roads.
<b>164</b>	Walm Lane and Cricklewood lane are essential to many local shoppers and commuters, and further congestion is the last thing that we need.
<b>165</b>	The report "Phase 2 (South) (Thameslink Station) Scoping Drop-In Application Transport Report: Report Rail FreightRevision P03   August 2017" does not contain a detailed traffic impact assessment report, including appropriate microsimulation traffic model to enable consultees make informed decision / comment.
<b><i>Transport – London Bus Depot</i></b>	
<b>166</b>	Concerns over the increase of traffic adding to the additional traffic that the London Bus depot across from the site is causing on a daily basis.
<b>167</b>	There is concern on the entrance to the site being nearly opposite the entrance to the Cricklewood Bus Garage. The following reported traffic issues are currently caused on the main road as a result of the garage entrance including: <ul style="list-style-type: none"> <li>- Buses parked outside the garage on the road causing congestion.</li> <li>- As buses align, park, pull in/out or turn around near the Garage it causes major congestion.</li> </ul> With the above issues already evident, there is major concerns that adding HGV to that particular piece of road will create a gridlock situation.
<b><i>Transport – Congestion</i></b>	
<b>168</b>	There is concern on the impact of extra vehicles on the already heavily congestion A5 (and Edgware Road) especially during peak times.
<b>169</b>	Quite frequently traffic approaching the Cricklewood Broadway lights from Chichele Road is unable to make any progress due to traffic from the other roads effectively blocking the junction and adding congestion to Cricklewood Lane (and this is before the increased traffic from the development currently impacting Edgware Road north of Cricklewood bus garage). The development proposal will only increase the traffic issues in the area.
<b>170</b>	This development application will have detrimental effect on Kilburn High Road which is already congested and will be unable to cope with this additional volume of heavy traffic. This will have a carry on effect on the local businesses and residences along that

	road.
171	Council should be considering introducing a congestion tax for cars driving within this area.
<b>Transport – Access</b>	
172	The trains accessing the facility should be isolated and arrive and depart from the north of the site.
173	There is concern with the access movements from A5 into the site and the knock on effect of large HGV entering and entering the site during busy peak times.
174	A waste Transfer station could be built with access from Claremont Rd.
<b>Transport – Public Transport</b>	
175	The development proposal will cause severe delays on local public transport (buses).
176	The proposed development will add an average of one HGV the roads per minute (based on the 800 HGVS between 7am and 7pm each working day). This extra traffic will cause extra congestion at the Staples Corner end of the section and also at Cricklewood Broadway (Cricklewood Lane-Chichelle-Road intersection). This level of extra traffic will also have detrimental effect on the local bus services ((routes 16, 32, 189, 226, 260, 266, 316, 332, 460) through the intersection at Cricklewood Broadway resulting in severely disrupted bus services during the work week.
<b>Transport – Infrastructure</b>	
177	The proposed development (and recent development in the area) has not included infrastructure upgrades, resulting in significant numbers of people and vehicles in the area using the same infrastructure.
178	The development application needs to illustrate the road infrastructure improvements that will be addressed through the proposal as the area is already beyond capacity.
<b>Transport – Parking</b>	
179	Car parking spaces are currently insufficient in the Dollis Hill and surrounding areas to this site.
<b>Transport – Cycling</b>	
180	There are no alternative cycling paths except the A5 for some residents in the area. Additional HGVs on the A5 will endanger the cycles and potentially discourage people from using cycling as a form of commutable transport.
181	There is no cycling designated path designed into the development application, yet the cycling routes in the BXC development and surrounding places goes in the direction of the A5. The mix of cyclists and HGVs on the same road (A5) with no designated cycle route or segregation is extremely dangerous. A Safe cycle infrastructure plan should be developed and incorporated into this planning application.
<b>Monitoring and Enforcement</b>	
182	There is concern that Barnet Council has lacked appropriate monitoring and management of the Donoghue's Waste Transfer site and including an additional site across the tracks without appropriate management will bring unacceptable noise, dust

	<p>and traffic to this site.</p> <p>Comments were made on the licensing of the site not being appropriately monitored such as transfer and break down of 200 tonnes of rubbish a day during strict operating hours and the coverage and storage conditions placed on the operating centre not being met. The Environment Agency assessed Donaghues and found 4 major breaches of the conditions of the planning permission.</p>
<b>183</b>	The hours of operation should ensure that there will be no negative noise and pollution impacted on the area. Concerns were raised over any night deliveries that may occur due to the proximity to residential houses.
<b>184</b>	There is concern that Barnet Council has lacked appropriate enforcement of previous conditions attached to planning permissions (such as mitigation factors – water to reduce dust) and appropriate management of assets and leases in the BXC area. Further evidence needs to be provided on the monitoring and enforcement strategy for ensuring any conditions applied to the decision notice will be carried out appropriately by the developer.
<b>185</b>	The proposals for monitoring the type of waste being brought to the site for onward transport are inadequate.
<b>186</b>	Future monitoring needs to be put in place to measure the pollution on the A5 immediately north and south of the freight facility exit and outside Our Lady of Grace Infant School. This includes putting measures in place to terminate the use of the RFF if the pollution levels rise beyond acceptable levels.
<b>187</b>	Residents are requesting reassurance from modelling will be incorporated into the approval to ensure that the quality of life before, during and after the installation of the development is measured and that any negative findings will be acted on by the Barent Council.
<b>188</b>	<p>Following recommended monitoring:</p> <ul style="list-style-type: none"> <li>• regular sound tests should be undertaken</li> <li>• work should not commence before 8am and must cease at 7pm, in keeping with standard residential practices</li> <li>• mitigating practises should be regularly audited at the company's expense and an independent complaints and disputes resolution process implemented.</li> </ul>
<b>189</b>	What enforcement measures will be put in place should the height of open aggregate stockpiles exceed the permitted heights?
<b>190</b>	Envisaged construction waste brought to the site will be brick and rubble. Checking measures need to be put in place to ensure that there are no hazardous building materials brought to site e.g.Asbestos.
<b>191</b>	The application says dust will be monitored on site and action will be taken if it becomes excessive, but does not provide baseline or trigger levels. It does not discuss how responsibility will be allocated among the operators or how rapid, firm and effective the action will be.
<b>Public Engagement</b>	
<b>192</b>	There are concerns that local resident's objections are not being heard through the development consultation process.

<b>193</b>	Concerns that not all residents have been appropriately consulted throughout the process, especially around new plans submitted.  <i>Not one resident of Pinemartine Estate – just across the road – has received a consultation paper</i>
<b>194</b>	Although the public were notified of the change of the freight facility from a container to aggregate and muckaway facility, they were not consulted prior to the decision being made to change the primary design and use of the RFF.
<b>195</b>	Only residents in close proximity to the freight site were sent consultation letters. The residents in neighbouring terraces, streets in the surrounding area should also have been sent consultation letters and actively engaged throughout this process
<b>196</b>	Further information is requested on how prospective buyers of Fellow apartments been consulted.
<b>Other</b>	
<b>Other – General Comments</b>	
<b>197</b>	The level of the railway track should be reinstated to the previous lower levels to reduce the noise and increase the effect of any acoustic barriers.
<b>198</b>	As a local resident, I am already unhappy with the conditions of the neighbourhood. This development proposal will only add negatively to the area.
<b>199</b>	Barnet does not currently monitor similar industrial sites regarding dust and traffic on neighbouring properties.
<b>200</b>	I used to live at 38 Midland Terrace metres away from the mooted plant and remember the poor air quality principally due to the many lorries and general congestion on the A5 close by - to add dust, noise and more exhaust fumes to the mix seems completely unacceptable to me.
<b>201</b>	The development application needs to demonstrate how it is meeting the Mayor of London's recently published Transport Strategy (and overall the Mayor of London's strategy on a greener and clear London) targeting less traffic congestion and airborne pollution across London.
<b>202</b>	Although there stands a historic relationship between Cricklewood and the railway lines, further justification is sought as to the benefit of this development for the community at this site on the railway.
<b>203</b>	Dollis Hill land has degraded over time and extra lorries and garbage coming through will determinately affect the residents quality of life in that area.
<b>204</b>	I am objecting to this planning application which is going to cause an adverse effect on the area.
<b>205</b>	Brent Cyclists, the Brent group of the London Cycling Campaign ( <a href="http://www.brentcyclists.org.uk">www.brentcyclists.org.uk</a> ) Object to the Development Application
<b>206</b>	I object to the planning application.
<b>207</b>	Objection on behalf of neighbours in Champion Terrace.
<b>208</b>	I object due to the impact on the railway terraces next to the proposed site.

<b>209.</b>	Barnet has not complied with the Town and Country Planning (General Permitted Development) (England) Order 2015, or acted in accordance with the earlier Statutory Instrument 1988/1812, which is still operative in The Town and Country Planning (Development Management Procedure) (England) Order 2010.
<b>210.</b>	There will be wider implications as a result of this application for the large area of North-West London which have not been adequately addressed in this application.
<b>211.</b>	The Terrace (Gratton) residents feel they are not being adequately considered during the consideration of this development application.
<b>212.</b>	The Council has implemented financial penalties to residents with diesel, high emissions cars so should not consider approving this proposal on environmental grounds.
<b>213.</b>	The litter generated by this size and type of development will be detrimental to the area.
<b>214.</b>	Residents have inquired if compensation will be provided to those people whose lives may be affected by the air and noise, traffic congestion and the houses that may have decreased in value.
<b>215.</b>	The knock on negative effects to Fortune Green was raised by residents (air pollution, HGVs and increase in freight trains).
<b>216.</b>	Objections and comments from Camden and Brent Councils and residents in these areas should also be taken into account before making a decision on this application.
<b>217.</b>	There is a plan for passenger trains to operate between Cricklewood and Old Oak Common, the RFF could be located there instead.
<b>218.</b>	Further justification is sought on how the development application aligns with the Borough of Barnet Air Quality Action Plan (AQAP) .
<b>219.</b>	There is concern that Brent resident's voices are not be listened to by Barnet Council and that the impact of the development has been pushed onto Brent residents.
<b>220.</b>	The development application should not be approved without prior consent from Brent council due to its proximity to the Borough.
<b>221.</b>	LB Barnet should be working with the community (residents, local businesses and neighbouring boroughs) to improve Cricklewood.
<b>222.</b>	I simply do not trust the planning department since the fiasco with British Nuclear Fuels some years back. BNFL used an alternative name and were granted permission for the Storage of " waste" overnight on the railway sidings on a weekly basis. So basically they ended up storing Nuclear waste which was coming to England from Europe on it's way to Sellafield. Containers could only come in one at a time , as they were deemed too dangerous to transport in greater numbers through Europe. Cricklewood Railway sidings was used as a storage base until 3 or 4 containers were collected together and then attached to an engine and taken up the country on the railway line to Sellafield. No one had any idea this was even going on until the Mark Antony investigation and subsequent Tv programme. How could anyone trust the council planning dept after that??
<b>223.</b>	The submitted plans will create unnecessary pressure on the already struggling transport and utility network in the area leading to increased levels of pollution and congestion.

224.	<p>Suggested Conditions:</p> <ul style="list-style-type: none"> <li>- enclose the site partially or fully to minimise dust and noise and light pollution</li> <li>- daily inspections to monitor the quality of the air, wheelwashing and other conditions. Empirical evidence on Claremont Road attests to the ineffectiveness of PB Donoghue washing.</li> <li>- recycling of water from sprinklers and wheelwashing, and a generally gold plated 21st century environmental approach</li> <li>- strict enforcement and heavy fines</li> </ul>
225.	<p>The reasoning for the change to this type of facility is that there is a high demand while in the same breath stating that it will not reach the 800 HGV capacity. The details of the market study should be released.</p> <p>The limit should be as per the original application "building to extend to a maximum of 29,300m2...All materials to be stored and handled within the building prior to onward transportation via road. Maximum of 400 HGVs per 24 hr period. 200 in and 200 out."</p>
226.	<p>Walking in the area will become unpleasant as a result of this application.</p>
227.	<p>The Cricklewood regeneration masterplan included enhancement of the Railway Terraces Conservation Area as one of its objectives. If this application is given planning permission, Barnet will betray that objective.</p>
228.	<p>On 13 July 2017 Barnet Council's Environment Committee published a paper entitled 'Tackling air pollution around Barnet's schools'. It refers to the Mayor's Air Quality Audit for schools, which monitors pollution around some of London's most polluted schools. The report states, in section 1.17, that recommendations to improve air quality around Barnet Schools include:</p> <p>'Reducing HGVs and diesel vans on the major roads will reduce air pollution at the schools near to these roads.'</p>
229.	<p>. The benign effect of supplying aggregates to BXC, a site in any case serviceable from the M1, will be tiny; the application itself suggests that only 20% of BXC's aggregate needs will be supplied from this site.</p>
<p><b>Other - Conflict of Interest</b></p>	
230.	<p>There are ongoing concerns about the possibility of capture of LB Barnet planning officers. The community relies on these officers to advise the LB Barnet councillors objectively regarding BXC planning submissions and to represent the public interest when dealing with the developer.</p> <p>Issues for concern include:</p> <ul style="list-style-type: none"> <li>- LB Barnet officers and Hammerson employees often arrived and left public consultation meetings together.</li> <li>- LB Barnet officers always recommend to approve all the BXC planning applications and push this hard when advising the councillors in the planning committee meetings. To date, no BXC application has been rejected by the councillors, despite community objections. At one recent planning committee meeting, 3 complicated BXC applications (including the reduction of the Templehoff Bridge from 4 to 3 lanes) were approved after just 20 mins in total at 10:15pm, with officers assuring the councillors that these applications had no problems attached to them.</li> </ul>

	<p>These meetings always appear to merely ‘rubber stamp’ what has been proposed, probably because the councillors haven’t read the copious documentation that accompanies each application and so haven’t understood even basic issues, let alone any nuances.</p> <ul style="list-style-type: none"> <li>- LB Barnet officers have now come from the private sector, i.e. Capita, and hence could be more easily captured by the private sector.</li> <li>- Finally, the governance arrangements for the joint venture between LB Barnet and Argent Related, or LB Barnet and DB Cargo, has not been placed in the public domain, so the community is unable to gauge whether LB Barnet are able to protect the interests of Barnet residents.</li> </ul>
<p><b>231.</b></p>	<p>I am concerned about the conflict of interests that exists with this application, given that the application appears to be a crucial part of the CPO3 process, the joint applicant is the LB of Barnet and planning committee is also the LB of Barnet. This unusual combination of factors gives rise to serious issues relating to procedural fairness.</p>