

APPENDIX B: SUMMARY OF PUBLIC REPRESENTATIONS RELATING TO 20/4817/FUL

Table 1: Summary of Public Representations from Consultation 1 (16th October to 13th November 2020)

Please note this table provides a summary of the comments received throughout the public consultation process carried out by the LPA on this planning application (20/4817/FUL) and is not intended to be a full transcript of those comments. Where multiple comments address the same issue, make the same point or use the same text, these are not repeated. A short officer response is provided where warranted, however, these are not intended to be a comprehensive assessment of the issues and should be read in conjunction with the report presented to the Strategic Planning Committee where a full appraisal of material planning considerations and policy assessments relevant to the proposed development are set out.

Number of Representations Received:	162
Number of Objections:	162
Number of Support Comments:	0
Number of Other Representations:	0

Issue No.	Summary of Issue/Representations Received	Officer Response
PRINCIPLE OF DEVELOPMENT		
Principle of Development – General Comments		
1.	The current site is already a mess and adding concrete to it will only make matters worse. Barnet cannot add dirty sites to our community when they haven't done anything to alleviate the suffering from residents owing to the existing large waste management plant (PB) Donoghue which is causing serious detrimental impact to the lives of local residents from hundreds of large waste lorries travelling along residential roads and emitting chemical-laden particles into the local environment.	The wider RFF site is controlled by a Site Management Plan which has been approved by the LPA pursuant to Condition 28 of Planning Permission 17/5761/EIA (as amended by 19/3098/NMA). This sets out how the site shall be managed and controlled. Paragraph 2.15 of the approved Site Management Plan states that "All road traffic will have the loads checked and covered in accordance with Condition 25 and the HGV checked / cleaned to be highway safe." Paragraph 3.8 further explains the dust mitigation measures including ensuring that "all vehicles go through the wheel washing facilities with rumble grids to dislodge accumulated mud or dust prior to leaving the site".

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		<p>Conditions have been proposed in respect of this application for the concrete batching plant which require the site to comply with the wider Site Management Plan for the RFF site as well as specific management of the concrete batching process proposed on Plot 3.</p> <p>The application has been assessed on its own merits based on the information provided and is recommended for approval based on the conditions and controls required to mitigate any potential impacts. The processes carried out at PB Donoghue are therefore not relevant to the consideration of this application.</p>
2.	<p>Promises made before the aggregate hub opened regarding environmental issues have not been honoured, and the area is increasingly dusty and littered with waste from the site.</p>	<p>See response to Issue 1 above. The wider RFF site is controlled by a Site Management Plan which has been approved by the LPA pursuant to Condition 28 of Planning Permission 17/5761/EIA (as amended by 19/3098/NMA). The SMP is to be reviewed and updated on an annual basis. Following an event in November 2020 where material was transported onto the public highway from the site, DB Cargo, the operators of the RFF site, have introduced further checks and measures to ensure that all vehicles leaving the site are in an appropriate state and further measures within the site to manage transfer of debris.</p>
3.	<p>Concrete batching is entirely beyond the scope of the original proposal for a freight transfer facility. We were reassured that DB Cargo's operation only involves inert, non-toxic material being brought onto the site. Capital Concrete will bring toxic caustic materials and is a betrayal. This will compound the already overly industrial area.</p>	<p>The proposed concrete batching process and plant required for it are being proposed under a separate application. The proposal is therefore being considered on its own merits having regard to the development and activities consented under Planning Permission 17/5761/EIA (as amended by 19/3098/NMA). The proposed development seeks to take advantage, and operate within the confines, of this existing rail transfer facility through the importation of aggregates by rail which would be stored on site (as per the current planning permission) and fed into the batching plant to create concrete. Whilst the proposed development is not directly related to or facilitating the movement of traffic by rail, it is considered appropriate to locate such a facility at a site where there is direct access to the railway whereby the number of vehicle movements can be reduced by removing the need to transport aggregate to site by HGV. See paragraphs 8.1-8.12 of the Committee Report for assessment of the principle of development, and paragraphs 8.13-8.45 for an assessment of the potential impacts of the development in terms of visual impact, air quality and noise.</p>

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4.	Despite assurances to Railway Terraces residents that this would not happen, DB Cargo is allowing this application from Capital Concrete for a batching plant in one of the bays (Plots); thus, creating a precedent by introducing heavy industry to a mainly residential area. Bringing industrial processing into what we were told was a rail freight site. Previously there has only been light industry on this site.	The Planning system does not prevent applications for planning permission from being submitted. The LPA has a duty to consider each planning application submitted to it on a case-by-case basis based on the relevant material planning considerations pertinent to the proposed development and application site. Any future planning application (for industrial uses or otherwise) would similarly be considered on its own merits and in the context of any other planning permissions approved for the site.
5.	This application doesn't seem to include any proposal to also take the construction waste coming into the site, feed any concrete from it into crushers, and use that along with the aggregates to make more readymix.	Paragraph 5.5 of the committee report sets out the detail of the operation proposed in relation to the production of concrete from the raw materials that are delivered by rail and road. The application does not propose any concrete crushing processes, nor is there any concrete crushing permitted on the rest of the RFF site.
6.	Given the failure of the eco-barrier in July, this proposal should not be considered until the barrier is completely reinstated and fit for purpose, with no risk of further collapse and a maintenance programme in place.	See Paragraph 8.52 – 8.54 of the committee report. Draft Condition 2 set out in Appendix A of this report prevents the concrete batching operation commencing until the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site has been completely reinstated or replaced with an alternative acoustic barrier that achieves the necessary level of acoustic attenuation as required by planning permission 17/5761/EIA (as amended 19/3098/NMA).
7.	Concrete plants (including Capital Concrete Ltd's plant) on the Claremont Industrial Estate has blighted their surroundings for years, covering the area between Brent Terrace and Tilling Road with toxic dust and creating noise nuisance. This application follows demolition of the industrial estate to free up space for Brent Cross Town. Barnet is obligated to find a new site for Capital Concrete but re-locating the business to DB Cargo's site will simply transfer the problem...blighting residents' lives.	See Section 8 of the committee report. The principle of redevelopment of the land within and around the Claremont Way Industrial Estate for the purposes of the BXC regeneration has already been established under the S73 Permission. This application for the proposed concrete batching plant on Plot 3 of the RFF has been assessed on its own merits and taking into consideration relevant planning policies and material considerations and context of the site. This application does not propose a relocation of the existing plant located on Brent Terrace (North) but proposes the installation of modern plant and equipment fit for purpose. The application is subject to a number of conditions to control activities and mitigate any potential impacts, as well as the controls also imposed on planning permission 17/5761/EIA (as amended 19/3098/NMA) for the RFF.
8.	There is no evidence that alternative layouts have been explored by the Applicant, and they have not engaged with local residents about this; and how different orientations could have an impact on noise, visual and air quality amenity.	See paragraphs 6.14-6.15 of the committee report. The Applicant carried out pre-application engagement with the local community, community groups, Ward Councillors and other key stakeholders as is detailed within the submitted Planning Application and

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		<p>Supporting Statement (PDE Consulting, October 2020) and the feedback from this engagement was used to inform the design of the scheme. Furthermore, as a result of responses received following the LPA’s initial consultation on the application, the Applicant amended the scheme to reduce the maximum heights of the proposed plant with the tallest elements (cement silos and aggregate hopper) now proposed to be 15.0 metres above ground level.</p> <p>See Section 8 of the committee report for the full appraisal of air quality, noise and visual impacts.</p>
9.	<p>The existing RFF mitigation is not working: the eco-barrier has partly fallen down and must be credibly reconstructed in a way that will work before this application is considered; the site is currently not working at full capacity and yet the site management plan is inadequate; and there is mud all over the roads.</p>	<p>See response to Issue 6 above in relation to the draft condition proposed to prevent the concrete batching operation before the acoustic barrier is completely reinstated or replaced with a suitable alternative acoustic barrier. See response to Issue 1 above in relation to site management plan.</p>
10.	<p>We were confronted with a similar plant about 20 years ago and managed to put a stop to it. How can there possibly be another application?</p>	<p>The Planning system does not prevent applications for planning permission from being submitted and the LPA must assess each planning application on its own merits having regard to the relevant development plan policies in force at the time and based on the relevant material planning considerations pertinent to the proposed development and application site.</p>
Principle of Development – Location		
11.	<p>The key potential consequences of any concrete batching plant are dust emissions, odours, noise and environmentally damaging wastewater which means they should not be site within a local community that has a large volume of housing with thousands of new additional homes being considered.</p>	<p>See paragraphs 8.1-8.12 of the committee report for assessment of the principle of development, and paragraphs 8.13-8.45 for an assessment of the potential impacts of the development in terms of visual impact, air quality and noise.</p>
12.	<p>Concrete batching will bring toxic, caustic materials (cement) onto the site. This has no place in highly populated central, Zone 2, area of London. Heavy industry has no place in Cricklewood, a heavily populated area in a very congested Zone 2 of central London. Previously there has only been light industry and that’s when population/congestion was much lower.</p>	<p>See response to Issue 11 above. The proposed development is for the construction and operation of a concrete batching facility which is to be located within an existing and operational aggregate and construction waste rail transfer facility. See Section 8, paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.</p>

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13.	Too close to protected terraces residential area. A mixing facility should not be located in a predominantly residential area. Extremely inappropriate and will be detrimental to the surrounding environment. Too close to residential housing on the Brent side of the Edgware Road. Dollis Hill is known to be a quiet and peaceful area and we want to keep it that way.	See paragraphs 8.1-8.12 of the committee report for assessment of the principle of development, paragraphs 8.13-8.45 for an assessment of the potential impacts of the development in terms of visual impact, air quality and noise, and paragraphs 8.46 - 8.51 for the assessment of the proposal in respect of heritage assets.
14.	The erection of a concrete batching facility will create more traffic and pollution in a predominantly residential area and where more homes are either in the planning process or shortly to be built. This is an industrial process and should not be positioned in a location where it would impact so many people's quality of life and health.	See response to Issue 13 above. See paragraphs 8.55 – 8.62 for an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site. Draft Condition 23 in Appendix A of this report ensures that when combined with HGV movements associated with the development approved under planning permission 17/5761/EIA (as amended), the maximum permitted number of Heavy Goods Vehicles (HGVs) movements (any vehicle over 3.5 tonnes unladen weight) utilising the site access off the A5 Edgware Road shall together not exceed 452 per day (226 in and 226 out) Mondays to Fridays and shall not exceed 264 per day (132 in, 132 out) on Saturdays.
15.	The area around the proposed plant is growing and developing as residential – heavy industry and housing is a poor mix. This type of development will further industrialise a residential area and expose a large number of residents to pollution, noise and traffic.	The proposed development is for the construction and operation of a concrete batching facility which is to be located within an existing and operational aggregate and construction waste rail transfer facility. See response to Issue 11 above and see paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highways impact.
16.	This proposal feels highly inappropriate for an area that has one of the largest populations in Barnet. Introduction of heavy industry into this part of NW2. The proposed location for such an industrial complex is wholly unsuitable as it would be close to residential dwellings.	See response to Issue 11 above.
17.	Too close to the Our Lady of Grace Infant School and will increase traffic and pollution.	See response to Issue 13 above in relation to an assessment of the potential impact on air quality and noise. See paragraphs 8.55 – 8.62 of the Committee Report an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV

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		<p>movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site.</p>
18.	<p>Cement is one of the most toxic products in the world and should never be processed in concrete production on an industrial scale close to residential communities.</p>	<p>See response to Issue 11 above. The proposed development is for the construction and operation of a concrete batching facility which is to be located within an existing and operational aggregate and construction waste rail transfer facility. See Section 8, paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.</p>
19.	<p>The rail line goes much further out than Cricklewood and there must be a less populated area than here to place these structures.</p>	<p>The proposed development seeks to take advantage, and operate within the confines, of this existing rail transfer facility through the importation of aggregates by rail which would be stored on site (as per the current planning permission) and fed into the batching plant to create concrete. It is considered appropriate to locate such a facility at a site where there is direct access to the railway whereby the number of vehicle movements can be reduced by removing the need to transport aggregate to site by HGV.</p>
AMENITY IMPACTS		
Amenity Impacts: Air Quality – General Comments		
20.	<p>The area will become more polluted, with children most affected by the project particularly those in the infant school.</p>	<p>See response to Issue 13 above in relation to an assessment of the potential impact on air quality and noise. The Applicant has assessed the potential impact of dust emissions (including wind-blown) at a number of receptors including (but not limited to) several residential properties within the Railway Terraces, Our Lady of Grace Infant and Nursery School, Claremont Primary School, residential properties at Fellows Square, Brent Terrace and Claremont Road, residential properties to the west of the A5 Edgware Road and commercial properties along the A5. Taking account of the pathway effectiveness from source to receptors (including direction of wind, distance from nearest dust source, wind speed and sensitivity of the various receptors), the Applicant has identified that that potential magnitude of effect from dust emissions would be between ‘Negligible Effect’ to ‘Slight Adverse Effect’ (i.e. low risk).</p>

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21.	Dust and air pollution (and noise) is not good for the wellbeing of children attending Our Lady of Grace Infant School – our friends and neighbours send their children there.	See response to Issue 20 above.
22.	The proposal will have a detrimental effect on the health and wellbeing of children in the school and neighbours in the area. I object in the middle of changing regulation that embraces and looks for less pollution from cars, factories and plant – schools and children will be placed in a disadvantaged health position.	See response to Issue 20 above. See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site.
23.	Children of Our Lady of Grace Infant School already suffer high air pollution and noise from traffic on the Edgware Road and the erection of such noisy and air polluting plant in close proximity to the school and living blocks is unacceptable. By building here, people living in Brent borough will be most affected.	See responses to Issue 20 and 22 above. The Council’s Environmental Health Officer has reviewed the Applicant’s noise impact assessment and is content that the proposed development would be unlikely to cause any significant impacts on nearby receptors as a result of the existing and proposed noise mitigation measures.
24.	Inevitable dust will be harmful to local residents. We have too much already with the new works, potential new blocks in B&Q car park and constant pollution from the A5.	See paragraphs 8.28 – 8.37 for a full assessment of air quality impact. The proposed development is for the construction and operation of a concrete batching facility which is to be located within an existing and operational aggregate and construction waste rail transfer facility. See Section 8, paragraph 8.33 of the committee report in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
25.	Have Barnet Council considered how this will affect future tenants of the proposed developments on the B&Q site and new flats being built at Brent Cross South?	The application has been assess in terms of air quality and noise impacts at the appropriate sensitive receptors relative to the site including (but not limited to) several residential properties within the Railway Terraces, Our Lady of Grace Infant and Nursery School, Claremont Primary School, residential properties at Fellows Square, Brent Terrace and Claremont Road, residential properties to the west of the A5 Edgware Road and commercial properties along the A5. It should be noted that the proposed redevelopment of the B&Q site remains subject to planning approval and is not, therefore, a committed scheme that can be taken into account when determining this planning application.

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26.	The planning for the rail freight facility should not be amended to include a site for concrete processing. The siting of this within a residential area will add to pollution this area is already subject to.	See response to Issue 20 above.
27.	Air quality and traffic already an issue because of Edgware Road, Cricklewood Lane and Claremont Road being particularly busy. Also concerned that Euro VI engines don't mean much on an already busy road, while introducing more heavy traffic.	See response to Issue 20 above. See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site.
28.	This corner of Cricklewood already has extremely polluted air from traffic and standing traffic and this is on record. This project would increase lorry movements and standing traffic.	See response to Issue 20 above. See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site.
29.	Air quality is so poor Brent have committed to making this a low traffic neighbourhood. How can it be suggested that more HGVs come to the area?	See response to Issue 20 above. See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site.
30.	The prevailing winds will bring its toxic pollution in our direction and beyond.	See paragraphs 8.24 - 8.37 of the committee report for an assessment of potential impact on air quality.
31.	The proposed positioning of the project would not only be problematic for residents of the B&Q site but would also (when westerly winds are prevailing) worsen air quality on Brent Terrace, the Golders Green Estate and two schools on Claremont Road. People standing on the platforms at Cricklewood and soon-to-	See paragraphs 8.24 - 8.37 of the committee report for an assessment of potential impact on air quality. See response to Issue 25 above in respect of the B&Q site.

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	come Brent stations would also notice a difference; and residents of the forthcoming Brent Cross Town.	
32.	The idling cement lorries (which will have to keep their engines running in order to use their pumps) will add to air pollution for the surrounding area.	The proposed concrete batching facility would be operated within the vehicular movement limits imposed by planning permission 17/5761/EIA for the rail transfer facility. In order to ensure that traffic-related emissions associated with the proposed development are controlled, conditions are proposed restricting the number of daily HGV movements associated with the proposed concrete batching facility and ensuring all HGVs are Euro VI compliant as a minimum, to align with the relevant controls imposed on planning permission 17/5761/EIA.
33.	The plant itself would create more air pollution as well as impeding traffic on the A5 which will increase pollution in the area from cars and trucks stuck in traffic.	See response to Issue 20 above. See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site.
34.	The cement proposal would tower even higher than the existing barrier and no additional health safeguards are proposed.	See paragraphs 8.14 – 8.22 of the committee report for an assessment of landscape and visual impacts and paragraphs 8.46 – 8.51 for an assessment of impact on heritage assets. Only partial views of the tops of the proposed concrete batching plant would be visible from some positions within the Railway Terraces Conservation Area.
35.	This development will ruin the overall feel and safety of the area: the building is too high and there are inadequate plans for safely handling toxic, caustic materials at the site.	There is no evidence that the application would have any impact on the safety of the area. See paragraphs 8.14 – 8.22 of the committee report for an assessment of landscape and visual impacts and paragraphs 8.46 – 8.51 for an assessment of impact on heritage assets. See Section 8, paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
36.	If cement manufacture is allowed there will be an increase in pollution and dust but this will be toxic.	See response to Issue 35 above.

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Amenity Impacts: Air Quality - Health Risks		
37.	Concerned about the detrimental health effects of concrete manufacture. Detrimental effects on respiratory system (e.g. Asthma). One resident has noticed a deterioration in their breathing since DB Cargo took over the (wider) site and it would get worse with the introduction of a concrete batching plant.	See paragraphs 8.24 - 8.37 of the committee report for an assessment of potential impact on air quality.
38.	This plant will bring and add hazardous material onto the site by road, including cement, which will only add to the pollution and risk for respiratory conditions in nearby areas, including the school.	See paragraphs 8.24 - 8.37 of the committee report for an assessment of potential impact on air quality. See Section 8, paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
39.	There is already very poor air quality in the area, an increase in airborne particulates is dangerous to the health of residents.	See paragraphs 8.24 - 8.37 of the committee report for an assessment of potential impact on air quality.
40.	Concrete batching is a major source of particulates which can be damaging to the lungs. This (proposal) is not something you would expect to have in a residential area. Long term exposure to chemical fumes will induce a plethora of lung diseases.	The proposed development is for the construction and operation of a concrete batching facility which is to be located within an existing and operational aggregate and construction waste rail transfer facility. See paragraphs 8.24 - 8.37 of the committee report for an assessment of potential impact on air quality, and paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
Amenity Impacts: Air Quality – Assessment and Modelling		
41.	The air pollution modelling is up in the air with no real samples, just hypothetical models – the road pollution is already high and more over Covid-19 restrictions has seen a higher than usual level of vehicles (therefore pollution on the road).	See paragraph 8.31 of the committee report. The operator of the wider aggregate and construction waste rail transfer facility has carried out air quality (and noise) monitoring to measure levels of PM10s, NO2 and dust and ensure operations on site do not exceed the agreed thresholds relevant to those emissions. As approved through the discharge of Condition 32 attached to planning permission 17/5761/EIA, the extent of air quality monitoring consists of one dust gauge and PM10 monitor positioned in proximity to

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		<p>residential properties at Fellows Square to the north; a dust gauge and automated air quality monitoring station on the internal haul road relative to prevailing wind directions; a dust gauge at the southwest boundary of the site (adjacent to the southern elevation of the Eco-Barrier); and an automatic air quality monitoring station and dust gauge positioned at the nearest sensitive receptor within the Railway Terraces. Whilst the operator has experienced difficulties in erecting the off-site monitoring station and dust gauge on third party land (Officers continue to liaise with the operator on this matter), aggregate and construction waste transfer operations on Plots 1 and 2 of the facility have been measured since commencement and continue to be monitored. The results are published in a live format on a publicly accessible website and monthly reports are issued to the Council. No exceedance of Site Action Levels as set out in the approved Site Management Plan (Condition 28 of planning permission 17/5761/EIA) has been identified to date.</p> <p>Although the risk of dust and other emissions has been identified as 'low' by the Applicant, conditions are recommended to ensure that the proposed development does not cumulatively cause any exceedance of the abovementioned air quality Site Action Levels. Draft Condition 14 in Appendix A requires Supplementary Air Quality Monitoring to be undertaken prior to construction of the development, throughout the construction of the development and during the initial 3 months of the operational period of the development.</p>
42.	The air quality impact analysis is speculative, based on optimistic predictions and hypothetical modelling, not on proper readings/verified data from similar sites.	See response to Issue 41 above.
43.	The assessment appears too optimistic and not thought through. I find it hard to believe that a concrete plant will not in any way reduce air quality.	The transfer of aggregate from rail wagon to Plot storage bays is an operation already consented (and mitigated) through planning permission 17/5761/EIA). The Applicant has proposed mitigation measures to further reduce the risk of any dust-related impacts arising from the proposed development. In line with the mitigation measures previously secured in relation to the aggregate and construction waste rail transfer facility and as illustrated on drawing number 12153-WMS-ZZ-XX-DR-C-30402-S3-P8 (Dust Suppression Layout), this includes the installation of a dust suppression system consisting of 4no. automated sprinklers covering the majority of Plot 3 (including all stockpiling and

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		aggregate storage areas, the areas around the concrete batching plant, and the open yard areas). To further ensure compliance with the wider rail transfer facility, the Applicant also proposes to adopt measures set out within the approved Site Management Plan for the RFF site.
44.	Measures to limit air-borne particles are over optimistic. Pollution levels can only go up as a consequence of this development to the detriment of the local community.	See response to Issue 41 above.
45.	Dust modelling has been based on emissions from quarries, not on concrete batching facilities.	The transfer of aggregate from rail wagon to Plot storage bays is an operation already consented (and mitigated) through planning permission 17/5761/EIA). The activities associated with the production of concrete beyond the movement of the materials already permitted take place within a closed system. The transfer of cement is an entirely enclosed process and the cement silos would be completely sealed, standalone units. Furthermore, these silos are designed with in-built mechanisms to prevent blow-out occurring due to over-pressurisation. This includes pressure sensors, alarms, integrated shut-off valves, pressure relief valves, and reverse air jet filters. Such design measures are recommended as best practice. Nevertheless, in response to these concerns, the Applicant has proposed to undertake additional temporary on-site dust monitoring covering a period 3 months prior to construction, the construction period and 3 months post construction including operation of the concrete batching facility. This is secured by Draft Condition 14 in Appendix A of this report.
46.	There is no evidence that the current failing mitigation will protect us from toxic materials. Nor have we reassurances regarding noise and dust levels as the impact studies appear to be speculative.	See responses to Issue 41 and 45 above.
Amenity Impacts: Air Quality - Dust		
47.	We will experience dust doubly from PB Donoghue and from the (proposed) concrete batching by the prevailing winds from the west.	See paragraph 8.31 of the committee report. The operator of the wider aggregate and construction waste rail transfer facility has carried out air quality (and noise) monitoring to measure levels of PM10s, NO2 and dust and ensure operations on site do not exceed the agreed thresholds relevant to those emissions. As approved through the discharge of Condition 32 attached to planning permission 17/5761/EIA, the extent of air quality

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		<p>monitoring consists of one dust gauge and PM10 monitor positioned in proximity to residential properties at Fellows Square to the north; a dust gauge and automated air quality monitoring station on the internal haul road relative to prevailing wind directions; a dust gauge at the southwest boundary of the site (adjacent to the southern elevation of the Eco-Barrier); and an automatic air quality monitoring station and dust gauge positioned at the nearest sensitive receptor within the Railway Terraces. Whilst the operator has experienced difficulties in erecting the off-site monitoring station and dust gauge on third party land (Officers continue to liaise with the operator on this matter), aggregate and construction waste transfer operations on Plots 1 and 2 of the facility have been measured since commencement and continue to be monitored. The results are published in a live format on a publicly accessible website and monthly reports are issued to the Council. No exceedance of Site Action Levels as set out in the approved Site Management Plan (Condition 28 of planning permission 17/5761/EIA) has been identified to date.</p> <p>Although the risk of dust and other emissions has been identified as 'low' by the Applicant, conditions are recommended to ensure that the proposed development does not cumulatively cause any exceedance of the abovementioned air quality Site Action Levels. Draft Condition 14 in Appendix A requires Supplementary Air Quality Monitoring to be undertaken prior to construction of the development, throughout the construction of the development and during the initial 3 months of the operational period of the development.</p>
48.	<p>Will any aggregates for cement be stored on the site and will they be covered or allowed to blow in the wind and create further pollution? There needs to be clarity as to whether or not any aggregates will be stockpiled and, if so, then the same conditions should apply to those stockpiles (i.e. as contained in conditions for the wider site).</p>	<p>The transfer of aggregate from rail wagon to Plot storage bays is an operation already consented (and mitigated) through planning permission 17/5761/EIA). The aggregate materials will be stored in open bays within the plot and will be subject to the same site management controls. This includes the installation of a dust suppression system consisting of 4no. automated sprinklers covering the majority of Plot 3 including all stockpiling and aggregate storage areas the areas around the concrete batching plant, and the open yard areas. See Draft Condition 6 (aggregate stockpiles), Condition 7 (maximum amount of aggregate to be stored on site), Condition 8 (maximum stockpile height), and Condition 10 (Site Management Plan).</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
49.	We do not want concrete dust wafting across the Terraces. The eco-barrier is now falling down and ineffective. No planning permission or usage variation by Capital Concrete to use the DB Cargo site should be allowed until the eco-barrier is re-established and time-tested for an agreed year or two.	See response to Issue 45 above. See Paragraph 8.52 – 8.54 of the committee report in relation to the replacement of the Eco-Barrier. Draft Condition 2 set out in Appendix A of this report prevents the concrete batching operation commencing until the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site has been completely reinstated or replaced with an alternative acoustic barrier that achieves the necessary level of acoustic attenuation as required by planning permission 17/5761/EIA (as amended 19/3098/NMA).
Amenity Impacts: Lighting		
50.	Inadequate explanation of the lighting systems that will be in place (height, direction of beam, hours of use and lux level information) to enable residents and the planning committee to understand what impact on visual amenity the proposed lighting will have.	See paragraph 8.38 of the Committee Report. The proposed development includes the erection of 8no. new lighting columns within Plot 3. These would be in addition to the external lighting previously consented under planning permission 17/5761/EIA. The proposed light new lighting columns would stand at a height of 8 metres above ground level (the same as the light columns consented) and the light fittings would be the same as those previously approved for the aggregate and construction waste rail transfer facility – Tamlite Stadia LED lighting – and the submitted plan referred to above demonstrates that all lighting would face inward from Plot 3’s boundaries. Draft Condition 9 in Appendix A limits the lights to only be on during operational hours.
Amenity Impacts: Noise		
51.	Concrete batching will generate a lot of noise, only increasing the already unacceptable noise from DB Cargo’s site.	See paragraphs 8.39 – 8.45 of the Committee Report for an assessment of the potential impact of noise. The Applicant has prepared and submitted a Noise Impact Assessment which considers the likely noise impacts of the proposed development on Plot 3 in view of the existing noise emissions (and mitigation) associated with the wider aggregate and construction waste rail transfer facility. Utilising the background levels established by the aggregate and construction waste rail transfer facility and noise data obtained from an existing operational concrete batching facility (at Silvertown), the Applicant has modelled predicted noise levels from the proposed development at the nearest residential receptors at Fellows Square and within the Railway Terraces. This includes consideration of the mitigating effects provided by both the existing acoustic mitigation measures associated with the aggregate and construction waste rail transfer facility, in addition to the Applicant’s

Issue No.	Summary of Issue/Representations Received	Officer Response
		proposed mitigation which includes a 3-metre high acoustic barrier positioned around part of the concrete batching plant.
52.	The noise generated by the facility will be significant and there has been inadequate mitigation of this in the proposed plans.	See response to Issue 51 above.
53.	The batching of concrete and increased activity on site will add to noise levels affecting local houses. A sound barrier provided for the existing site was blown over by the wind – the poor construction is an indication of how seriously the occupier takes this aspect of their impact on the local community.	See response to Issue 51 above. Draft Condition 2 set out in Appendix A of this report prevents the concrete batching operation commencing until the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site has been completely reinstated or replaced with an alternative acoustic barrier that achieves the necessary level of acoustic attenuation as required by planning permission 17/5761/EIA (as amended 19/3098/NMA).
54.	The 3-metre noise barrier that can be seen in drawings as being sited around the development is insufficient to block noise from aggregates being propelled up a conveyor belt to hoppers, which are higher than the barrier.	See response to Issue 51 above.
55.	This would bring noisy, heavy industry to the urban Conservation Area neighbourhood, adding to the noise from DB Cargo’s operation.	See response to Issue 51 above.
56.	The volume of noise from DB Cargo’s operation is already too high.	The development of the RFF approved through planning permission 17/5761/EIA includes a requirement for noise monitoring. On-site monitoring has been in place since March 2020 and off-site mobile noise monitoring at the sensitive receptors agreed through the conditions to the RFF planning permission has also been undertaken. Noise measurement work has been carried out when a train was being loaded on Plot 2 (Wednesday 26 August 2020) and further measurements in September 2020 in addition to that which is otherwise required by the Planning Permission. These noise surveys confirm that the levels of noise measured from the activity on the RFF site (note that this only comprises Plots 1 and 2 and this stage) are well within the threshold specified in Condition 29 of Planning Permission 17/5761/EIA.

Issue No.	Summary of Issue/Representations Received	Officer Response
57.	Extra noise from aggregates feeding into the mixer and the mixing itself. This introduces a new and different noise to those we (residents of the Railway Terraces) already hear.	The transfer of aggregate from rail wagon to Plot storage bays is an operation already consented (and mitigated) through planning permission 17/5761/EIA). See paragraphs 8.39 – 8.45 of the Committee Report for an assessment of the potential impact of noise from the proposed development (including the transfer of aggregates from storage bays to the loading hopper).
58.	The noise report does not consider the cumulative impact of the plant operating and the activities already taking place on site.	The submitted Noise Impact Assessment does consider the likely noise impacts of the proposed development on Plot 3 in view of the existing noise emissions (and mitigation) associated with the wider aggregate and construction waste rail transfer facility.
59.	The noise created from the processing plant machinery, pumps, conveyors and idling lorries' will be a significant issue so close to many homes. Noise from such facilities cannot be reduced at source and so the facility should not be permitted or at the very least the entire plot with all operations fully enclosed in an acoustically clad building.	See response to Issue 51 above. The concrete batching plant is proposed to be enclosed by cladding and therefore a covered structure was deemed not to be required due to the design proposed which already encloses the plant. In essence, the plant is already enclosed. Draft condition 13 requires a further noise assessment in respect of any plant related to the Laboratory Unit including details of where the equipment will be placed and details of silencers to be fitted, and other sound insulation measures to reduce any noise impacts.
VISUAL IMPACTS		
60.	The silo is too high and the proposal itself is out of keeping with the area.	See Paragraphs 8.46 - 8.51 of the Committee Report. As a result of responses received following the LPA's initial consultation exercise, the Applicant amended the scheme to reduce the maximum heights of the proposed plant with the tallest elements (cement silos and aggregate hopper) now proposed to be 15.0 metres above ground level. The Applicant has produced photomontages as part of their Landscape and Visual Impact Assessment to demonstrate how this development might be viewed from various receptors. Given the presence of the existing Eco-Barrier (or any replacement of it that may be agreed), only the tops of the silos and mixer tower would be partially visible from some positions within the Railway Terraces Conservation Area. These views are at a distance of some 280m from the site.

Issue No.	Summary of Issue/Representations Received	Officer Response
61.	The height of the proposed facility is just under 17 metres tall. This will fundamentally affect and blight the nature of the skyline in the surrounding area.	See response to Issue 60 above. The Applicant amended the scheme to reduce the maximum heights of the proposed plant with the tallest elements (cement silos and aggregate hopper) now proposed to be 15.0 metres above ground level.
62.	The silos would be visible from the streets.	The Applicant has produced photomontages as part of their Landscape and Visual Impact Assessment to demonstrate how this development might be viewed from various receptors. Given the presence of the existing Eco-Barrier (or any replacement of it that may be agreed), only the tops of the silos and mixer tower would be partially visible from some positions within the Railway Terraces Conservation Area to the south. These views are at a distance of some 280m from the site. The silos would be visible in views from the A5 Edgware Road between the existing buildings of Access Storage and Lidl Supermarket and in the context of the canopy structure over Plot 4 of the RFF site. In this existing urban/warehouse context the visual impact is considered to be acceptable.
63.	It is a 17-metre high concrete batching plant about 200 metres from where people live. Some of those people are in multi-storey residence who will look at the concrete plant all day every day.	See response to Issue 60 above.
64.	The proposed silos would be visible above the existing eco-barrier which incidentally was damaged in July and has yet to be repaired. Intrusion of inappropriate structures which should be relegated to sparsely populated area behind special landscaping.	The Applicant has produced photomontages as part of their Landscape and Visual Impact Assessment to demonstrate how this development might be viewed from various receptors. Given the presence of the existing Eco-Barrier (or any replacement of it that may be agreed), only the tops of the silos and mixer tower would be partially visible from some positions within the Railway Terraces Conservation Area. These views are at a distance of some 280m from the site. Daft Condition 2 set out in Appendix A of this report prevents the concrete batching operation commencing until the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site has been completely reinstated or replaced with an alternative acoustic barrier.
65.	Some projected lines of sight images within the application are not indicative of the true impact – taken with deciduous trees in leaf (i.e. in the summer period) occluding some of the view.	The Applicant provided an update to Viewpoint C in the photomontage to show the proposal in winter without leaves on the trees. Given the presence of the existing Eco-Barrier (or any replacement of it that may be agreed), only the tops of the silos and mixer tower would be partially visible from some positions within the Railway Terraces Conservation Area. These views are at a distance of some 280m from the site.

Issue No.	Summary of Issue/Representations Received	Officer Response
66.	Parts of the proposed plant would remain visible from parts of the Railway Terraces and a number of bedrooms at the northern end of Midland Terrace and Dorchester Court, which would look directly at the silos. Being able to see a large industrial plant like this from our homes, gardens and streets would have a significant impact on our amenity.	See Paragraphs 8.46 - 8.51 of the Committee Report. As a result of responses received following the LPA's initial consultation exercise, the Applicant amended the scheme to reduce the maximum heights of the proposed plant with the tallest elements (cement silos and aggregate hopper) now proposed to be 15.0 metres above ground level. The Applicant has produced photomontages as part of their Landscape and Visual Impact Assessment to demonstrate how this development might be viewed from various receptors. Given the presence of the existing Eco-Barrier (or any replacement of it that may be agreed), only the tops of the silos and mixer tower would be partially visible from some positions within the Railway Terraces Conservation Area. These views are at a distance of some 280m from the site. The views of the site from properties at the northern end of the Railway Terraces would be blocked by the Eco-Barrier.
67.	The application treats the Matalan site as retail only. A multi-storey residential complex will occupy the site (subject to planning permission) and their visual amenity will be grossly affected by the proposed development.	The proposed redevelopment of the Matalan site remains subject to planning approval and is therefore not a committed scheme that can be taken into account when determining this planning application. However, it is noted that the Matalan site is some 200m away from the proposed concrete batching plant and the line of sight would be across the existing Access Self Storage warehouse building which is at an elevated level relative to the Matalan site.
68.	The outlook from people's homes and amenity spaces will be affected. Being at all visible from homes and gardens will harm people's enjoyment of their personal amenity spaces but also from the common gardens and outdoor amenity spaces unique to this Conservation area.	See response to Issue 66 above.
URBAN DESIGN AND HERITAGE		
69.	The creation of such a site would be a radical and unwarranted departure from the area's heritage.	See Paragraphs 8.46 - 8.51 of the Committee Report for an assessment of potential impact on heritage assets.
70.	The visual impact of a structure as high and overbearing as the concrete batching plant, which will be visible over the already collapsing 'eco-barrier', will affect the character of the Cricklewood Railway Terraces Conservation Area.	See response to Issue 60 above.

Issue No.	Summary of Issue/Representations Received	Officer Response
71.	The Conservation Area would be blighted by overshadowing causing loss of light, privacy and visual impairment from development on two sides from the Matalan site opposite the Railway Terraces and high-rise flats on the Co-Op site in Cricklewood Lane. This proposal would add a third side to our surroundings to decimate our environment.	The proposed redevelopment of the Matalan site and B&Q site in Cricklewood Lane remains subject to planning approval. This application is assessing the merit and impact of the proposed concrete batching plant. See response to Issue 59 above in relation to assessment of visual impact of the proposed development.
72.	The build is unsightly and will be noisy, spoiling a currently quiet and private Conservation Area. The proposal would ruin the current idyllic setting.	See Paragraphs 8.46 - 8.51 of the Committee Report for an assessment of potential impact on heritage assets. The Conservation Area's significance is directly attributable to the railway heritage of Cricklewood. It has not been uncharacteristic for land within the vicinity of this heritage asset to accommodate industrial type uses. It is considered that the proposed development would not result in any substantial harm to the setting of the Conservation Area.
73.	The plant processer would visually impact on the setting of the Conservation Area, the Railway Terraces.	See response to Issue 60 above.
LAND CONTAMINATION		
74.	The facility will mean that hazardous materials are imported by road onto the site with the added risks of pollution and contamination (the building waste that is currently imported by road is non-putrescible, non-hazardous waste that is graded off-site before being imported).	The proposed development is for the construction and operation of a concrete batching facility which is to be located within an existing and operational aggregate and construction waste rail transfer facility. See paragraphs 8.24 - 8.37 of the committee report for an assessment of potential impact on air quality, and paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
75.	The concrete plant will require cement to be imported to the site, this means a highly caustic and toxic substance would be brought onto the site with all the risks of contamination to air and water that come with it.	See response to Issue 74 above.
76.	Worried about the potentially caustic/toxic nature of any dust that is produced by this facility and the impact on the soil/air we grow our food in at the nearby allotment within the Railway Terraces.	See response to Issue 74 above.

Issue No.	Summary of Issue/Representations Received	Officer Response
77.	Inadequate exploration of the impact of cement/concrete wash off entering the water system on site and the surrounding area.	The application for the wider site was accompanied by a drainage strategy produced by AECOM for each of the plots within the RFF, including Plot 3. This drainage strategy was accepted by Thames Water and the infrastructure to support each of the Plots has already been constructed and is in place. The application currently being considered is also accompanied by a Drainage Strategy which states that the proposed development will simply be connecting to the existing consented onsite drainage and complimenting/enhancing the existing scheme with the provision of an additional Geocellular crate system to meet the current climate change requirements for the site during the 1 in 100 year storm event. The application also proposes a rainwater harvesting system to provide some of the water requirements for the concrete batching plant process. The wedge pit is used to collect yard surface water runoff and for truck mixers to wash out into at the end of the day. Any settled solids are transferred to the drying bays and the collected water will be recycled for use within the concrete batching plant. Water taken from the wedge pit for use in the concrete plant is used in the recycled water storage tanks.
PUBLIC ENGAGEMENT		
78.	The consultation process has been patchy and consultation period too short for a significant development.	See paragraphs 6.14-6.15 of the committee report. The Applicant carried out pre-application engagement with the local community, community groups, Ward Councillors and other key stakeholders as is detailed within the submitted Planning Application and Supporting Statement (PDE Consulting, October 2020) and the feedback from this engagement was used to inform the design of the scheme. In accordance with the relevant Regulations (Town and Country Planning (Development Management Procedure) Order 2010 (as amended) and Town and Country Planning (Mayor of London) Order 2008), the Local Planning Authority conducted a public consultation on the initial application and a further round of consultation following the receipt of additional information seeking to amend the proposal.
79.	Inadequate consultation with the wider community. The Applicant has not sent notification letters to all households and many people have no idea what is proposed.	See response to Issue 78 above.

Issue No.	Summary of Issue/Representations Received	Officer Response
80.	Brief Council consultation amid all the disruption of Covid-19.	The consultation has been in accordance with the relevant Regulations (Town and Country Planning (Development Management Procedure) Order 2010 (as amended)).
ENVIRONMENT		
81.	The environmental assessment has treated the sensitivity of the site currently occupied by Matalan as retail (and so therefore not particularly sensitive site). The area is in fact going to be redeveloped as flats (height of development to be confirmed) and so the assessment has a gap in it.	The relevant nearest sensitive receptors have been considered in the assessment of potential impacts of the proposed development. The proposed redevelopment of the Matalan site remains subject to planning approval and is therefore not a committed scheme that can be taken into account when determining this planning application.
82.	The proposal is not justifiable and will have a direct and negative environmental impact on its immediate neighbours, local roads and the wider area.	See paragraphs 8.1-8.12 of the committee report for assessment of the principle of development, and paragraphs 8.13-8.45 for an assessment of the potential impacts of the development in terms of visual impact, air quality and noise. See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highways impact.
83.	The cement industry is one of the three primary producers in the UK of carbon dioxide, a major greenhouse gas, I don't see anything in the proposals to mitigate this.	The proposed development is for the batching of concrete, using cement as an additive, it is not for the production or manufacture of cement which is recognised as a producer of carbon dioxide.
84.	While I note the intended concrete batching plant is considered not to exceed the environmental impacts arising from the aggregate transfer operations already granted permission, I am concerned the baseline data is no longer appropriate. Implementation of the ULEZ and banning of Euro IV buses may have significantly reduced emissions from the A5, therefore the magnitude of the impact may not be accurate. Plus, the Covid-19 pandemic will have further altered the local baseline air quality, with reduced public transport usage and increased home working has increased the sensitivity of local residential receptors to impacts from the proposed development during daytime hours of operation.	The planning application is accompanied by an air quality assessment which considers the impact of the proposed development. The baseline for this assessment has been informed by ongoing and continuous air quality monitoring carried out by both the London Borough of Barnet and London Borough of Brent. The Council's Environmental Health Officer has reviewed the planning application and has not raised any concerns about the basis upon which the Applicant's assessment has been carried out. See paragraphs 8.24-8.37 which considers the proposed development in respect of air quality.

Issue No.	Summary of Issue/Representations Received	Officer Response
TRANSPORT		
Transport – General Comments		
85.	The existing rail freight operations have led to dirt and dust being tracked onto the A5 and adjoining pavement. This is not being managed properly and the site is not yet fully operational – the problem will be exacerbated when the site is fully operational and toxic material will be spread across the road.	See response to Issue 1 above. The wider RFF site is controlled by a Site Management Plan which has been approved by the LPA pursuant to Condition 28 of Planning Permission 17/5761/EIA (as amended by 19/3098/NMA). The SMP is to be reviewed and updated on an annual basis. Following an event in November 2020 where material was transported onto the public highway from the site, DB Cargo, the operators of the RFF site, have introduced further checks and measures to ensure that all vehicles leaving the site are in an appropriate state and further measures within the site to manage transfer of debris.
86.	The use of existing facilities has led to mud and dirt being tracked in/out of the facility. The inability to contain the egress of waste is concerning in the context of concrete/cement also being handled on site.	See response to Issue 1 above. The wider RFF site is controlled by a Site Management Plan which has been approved by the LPA pursuant to Condition 28 of Planning Permission 17/5761/EIA (as amended by 19/3098/NMA). The SMP is to be reviewed and updated on an annual basis. Following an event in November 2020 where material was transported onto the public highway from the site, DB Cargo, the operators of the RFF site, have introduced further checks and measures to ensure that all vehicles leaving the site are in an appropriate state and further measures within the site to manage transfer of debris.
87.	Mitigation for the current aggregate site has been breached in respect of a break down in wash down of vehicles. I have seen dirt and dust on the pavement and on the Edgware Road coming from the (RFF) site. I am concerned about DB Cargo’s ability to monitor Capital Concrete’s vehicles bringing ‘rubble’ to the site and to turn away any that do not reach European emission standards.	<p>Conditions imposed on planning permission 17/5671/EIA (as amended by 19/3098/NMA) for the aggregate and non-putrescible construction waste rail transfer facility include controls to ensure HGVs utilise the wheel washing facilities to prevent mud being tracked onto the public highway. The LPA have received complaints that wheel washing has not been effective and have reminded the Applicant of their obligations. It is understood that additional road sweepers had been deployed in response to that complaint.</p> <p>In the event that planning permission is granted for the proposed development, the LPA are able to ensure the imposition of similar conditions and controls to ensure the public highway remains free of mud and debris. Those conditions and obligations would be enforceable by the LPA in their own right in addition to any commercial arrangements between DB Cargo and the Applicant. However, to clarify, the proposed development does not involve the importation of ‘rubble’ by road. The aggregates imported to the site by rail would be used in the proposed concrete batching process to create cement. Furthermore,</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
		the Applicant has stated that all HGVs would be Euro VI compliant as a minimum. Vehicle emissions along the Edgware Road are likely to be further reduced following introduction of the Ultra-Low Emission Zone (ULEZ).
88.	How will traffic access and leave the site? It's a residential area.	Draft Condition 22 in Appendix A will limit Vehicular ingress and egress to/from the site shall be via the existing access off the A5 Edgware Road only. It also restricts HGV traffic travelling between the site and A406 North Circular Road to only use the A5 Edgware Road and shall not use Dollis Hill Lane, Humber Road or Oxgate Lane or any other residential streets in the area, unless a specific address requires a concrete product delivery.
Transport – Safety		
89.	It will not be safe for children to pass this area due to the big lorries.	See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highway capacity and safety. TfL and the Highways Authority have been consulted on the application and are satisfied with the proposals.
90.	The Council needs to consider the effect of increased large vehicles on the A5 on cyclists. Use of cycles as a safe mode of transport in urban areas should be encouraged instead of making it more difficult for them.	See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highway capacity and safety. TfL and the Highways Authority have been consulted on the application and are satisfied with the proposals.
Transport – Traffic Increase and Congestion		
91.	The importation of cement by road will increase road traffic with even more HGV vehicles – this will increase the risk of accidents at the same time as encouraging children to walk and cycle to school.	See paragraphs 5.6 – 5.10 of the Committee Report for information on the amount of aggregate and cement required and paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highway capacity and safety. The aggregate required for the production of concrete will be imported by rail under the already consented rail freight facility. To produce the proposed volume of concrete (100,000m3 per annum) the Applicant states that 36,000 tonnes of cement per annum would be required to be imported to the Site via purpose-specific 30-tonne tankers The proposed total number of HGV movements would fall within the limits already controlled by Condition 17 of planning permission 17/5671/EIA, which allows up to 452 HGV movements per day (226 in, 226 out) Monday to Friday and up to 264 HGV movements (132 in, 132 out) on Saturdays. The proposed average of 113 HGV movements per day for the concrete batching facility equates to 25% of the wider site's permitted total.

Issue No.	Summary of Issue/Representations Received	Officer Response
92.	Concerns about additional traffic on the A5 next to Lidl where cars waiting to enter the tiny car park already regularly block the bus lane.	See paragraphs 8.55 – 8.62 of the Committee Report for an assessment of highway capacity and safety. The proposed total number of HGV movements would fall within the limits already controlled by Condition 17 of planning permission 17/5671/EIA, which allows up to 452 HGV movements per day (226 in, 226 out) Monday to Friday and up to 264 HGV movements (132 in, 132 out) on Saturdays. The proposed average of 113 HGV movements per day for the concrete batching facility equates to 25% of the wider site’s permitted total.
93.	More large vehicles turning onto an already congested carriageway resulting in increased pollution caused by perpetual traffic jams. The road widening at Cricklewood Lane will not relieve the extra traffic from the site. Lorries currently leaving the site push their way out on the carriage way and this behaviour will increase if this proposal goes ahead.	See response to Issue 91 above.
94.	This proposal will add to congestion at a time we should be encouraging cycling and walking.	See response to Issue 91 above.
OTHER COMMENTS		
General Comments		
95.	What was the cause of the collapse of the EcoBarrier? Was it a combination of rain, train-track vibrations and faulty eco-design?	DB Cargo have employed external specialist consultants to assess the damaged EcoBarrier and are in discussions with the original manufacturer. In the meantime, the site has been made safe following a period of vibration monitoring and movement monitoring. An exclusion zone is in place around the remaining structure.

Table 2: Summary of Public Representations from Consultation 2 (30th December 2020 to 25th January 2020)

Please note this table provides a summary of new issues raised in relation to the application proposals through the comments received throughout the second public consultation process carried out by the LPA on this planning application (20/4817/FUL) and is not intended to be a full transcript of those comments. Where representations raise the same issues and comments as the first round of consultation, these are not repeated. Where multiple comments address the same issue or make the same point these are not repeated. A short officer response is provided where warranted, however, these are not intended to be a comprehensive assessment of the issues and should be read in conjunction with the report presented to the Strategic Planning Committee where a full appraisal of material planning considerations and policy assessments relevant to the proposed development are set out.

Number Representations Received:	48
Number of Objections:	48
Number of Support Comments:	0
Number of Other Representations:	0

Issue No.	Summary of Issue/Representations Received	Officer Response
PRINCIPLE OF DEVELOPMENT		
Principle of Development – General Comments		
1.	There are plans to put up new residential buildings all over the area, which has already been and will continue to be a huge disruption to us, but this is at odds with that. Railway Terraces are under siege surrounded by applications for planning developments on every side.	The application has been assess in terms of air quality and noise impacts at the appropriate sensitive receptors relative to the site including (but not limited to) several residential properties within the Railway Terraces, Our Lady of Grace Infant and Nursery School, Claremont Primary School, residential properties at Fellows Square, Brent Terrace and Claremont Road, residential properties to the west of the A5 Edgware Road and commercial properties along the A5. It should be noted that the proposed redevelopment of the B&Q site remain subject to planning approval and are not, therefore, committed schemes that can be taken into account when determining this planning application.
2.	If all the planning applications for residential development in this area go ahead, the population will increase hugely. It can't be wise to allow Capital Concrete to create a site of heavy industry in the middle of a high density residential area.	See response to Issue 1 above.

Issue No.	Summary of Issue/Representations Received	Officer Response
3.	The plans only show commercial properties and don't show homes less than 100m away.	The application has been fully assessed with regard to the nearest sensitive receptors including residential properties in the Railway Terraces.
4.	Proposal to import and store cement to use in concrete manufacture is contrary to the conditions of DB Cargo's planning permission which only permits aggregates and non-putrescible waste.	The proposed concrete batching process and plant required for it are being proposed under a separate application to the planning consent for the RFF site. The proposal is therefore being considered on its own merits having regard to the development and activities consented under Planning Permission 17/5761/EIA (as amended by 19/3098/NMA). The proposed development seeks to take advantage, and operate within the confines, of this existing rail transfer facility through the importation of aggregates by rail which would be stored on site (as per the current planning permission) and fed into the batching plant to create concrete. Whilst the proposed development is not directly related to or facilitating the movement of traffic by rail, it is considered appropriate to locate such a facility at a site where there is direct access to the railway whereby the number of vehicle movements can be reduced by removing the need to transport aggregate to site by HGV. See paragraphs 8.1-8.12 of the Committee Report for assessment of the principle of development, and paragraphs 8.13-8.45 for an assessment of the potential impacts of the development in terms of visual impact, air quality and noise.
5.	The experience so far of DB Cargo's facility has been one of mucky roads and many heavy vehicle movements, it is currently operating well below capacity. The wear and tear on the A5 is visible and the pavements along with street furniture are covered in mud and aggregate.	<p>The wider RFF site is controlled by a Site Management Plan which has been approved by the LPA pursuant to Condition 28 of Planning Permission 17/5761/EIA (as amended by 19/3098/NMA). This sets out how the site shall be managed and controlled. Paragraph 2.15 of the approved Site Management Plan states that "All road traffic will have the loads checked and covered in accordance with Condition 25 and the HGV checked / cleaned to be highway safe." Paragraph 3.8 further explains the dust mitigation measures including ensuring that "all vehicles go through the wheel washing facilities with rumble grids to dislodge accumulated mud or dust prior to leaving the site".</p> <p>Conditions have been proposed in respect of this application for the concrete batching plant which require the site to comply with the wider Site Management Plan for the RFF site as well as specific management of the concrete batching process proposed on Plot 3.</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
Principle of Development – Location		
6.	Appreciate that the concrete product is needed, but there has to be a better site which would provide a less detrimental affect on the area it sits in.	The proposed development seeks to take advantage, and operate within the confines, of this existing rail transfer facility through the importation of aggregates by rail which would be stored on site (as per the current planning permission) and fed into the batching plant to create concrete. It is considered appropriate to locate such a facility at a site where there is direct access to the railway whereby the number of vehicle movements can be reduced by removing the need to transport aggregate to site by HGV. See paragraphs 8.1-8.12 of the Committee Report for assessment of the principle of development.
7.	Concrete batching plant should not be located next to residential homes. Doesn't matter if the silos have been reduced in height, or any other amendments to the plans that are made.	See paragraphs 8.1-8.12 of the committee report for assessment of the principle of development, and paragraphs 8.13-8.45 for an assessment of the potential impacts of the development in terms of visual impact, air quality and noise
8.	Unsuitable site and would have a detrimental impact on people's lives. Will bring toxic materials to the site.	See Section 8, paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
9.	There are plenty of other railheads outside London which would make more sense.	The Applicant currently operates the concrete batching facility located off Brent Terrace (North) which serves a market and demand for concrete products covering Wembley and Cricklewood, Finchley, Golders Green, Kilburn, Muswell Hill, Islington, Edgware, Harrow, Old Oak Common, Acton and Paddington. The Brent Terrace (North) site is subject to a Compulsory Purchase Order as the land is required to deliver the BXC regeneration scheme. The proposed development for a new concrete batching facility would seek to serve the same market area. Furthermore, the Application Site would utilise the existing rail connection which would (by comparison to the Brent Terrace facility) result in a reduction of HGV movements on the local highway network as aggregate would be imported by rail, instead of by road.

Issue No.	Summary of Issue/Representations Received	Officer Response
10.	Reducing height of silos and tower proposals in no way mitigates this is a heavy, dirty industrial site proposal.	See paragraphs 8.1-8.12 of the committee report for assessment of the principle of development, and paragraphs 8.13-8.45 for an assessment of the potential impacts of the development in terms of visual impact, air quality and noise.
AMENITY IMPACTS		
Amenity Impacts: Air Quality – General Comments		
11.	The application will have a negative effect on the area I live.	Section 8 of the Committee Report sets out how the application has been assessed in terms of potential impacts on air quality, noise, landscape and visual impact, transport and vehicle movements.
12.	The applicants have not provided any hard data about what an installation like this produces in terms of air pollution when functioning normally. The concrete plant will spread very toxic dust over our residential area.	<p>See paragraph 8.31 of the committee report. The operator of the wider aggregate and construction waste rail transfer facility has carried out air quality (and noise) monitoring to measure levels of PM10s, NO2 and dust and ensure operations on site do not exceed the agreed thresholds relevant to those emissions. As approved through the discharge of Condition 32 attached to planning permission 17/5761/EIA, the extent of air quality monitoring consists of one dust gauge and PM10 monitor positioned in proximity to residential properties at Fellows Square to the north; a dust gauge and automated air quality monitoring station on the internal haul road relative to prevailing wind directions; a dust gauge at the southwest boundary of the site (adjacent to the southern elevation of the Eco-Barrier); and an automatic air quality monitoring station and dust gauge positioned at the nearest sensitive receptor within the Railway Terraces. Whilst the operator has experienced difficulties in erecting the off-site monitoring station and dust gauge on third party land (Officers continue to liaise with the operator on this matter), aggregate and construction waste transfer operations on Plots 1 and 2 of the facility have been measured since commencement and continue to be monitored. The results are published in a live format on a publicly accessible website and monthly reports are issued to the Council. No exceedance of Site Action Levels as set out in the approved Site Management Plan (Condition 28 of planning permission 17/5761/EIA) has been identified to date.</p> <p>Although the risk of dust and other emissions has been identified as 'low' by the Applicant, conditions are recommended to ensure that the proposed development does</p>

Issue No.	Summary of Issue/Representations Received	Officer Response
		not cumulatively cause any exceedance of the abovementioned air quality Site Action Levels. Draft Condition 14 in Appendix A requires Supplementary Air Quality Monitoring to be undertaken prior to construction of the development, throughout the construction of the development and during the initial 3 months of the operational period of the development.
Amenity Impacts: Air Quality - Health Risks		
13.	The applicants, in their responses, have not addressed the concern in relation CONSEQUENCES of a leak of toxic chemicals, only assured us that they will continue to monitor so that they can act swiftly IF there is an exceedance of emissions. That is not good enough when the proposed plant is so close to an established residential community.	As set out in the submitted Surface Water Drainage Strategy and Ground Condition Desk Top Survey, the proposed development does not represent any significant pollution risk and the development would connect into the existing drainage infrastructure (complemented with an additional attenuation tank) which has previously been agreed by Thames Water. It is also noted that the Environment Agency have not raised any objections the proposed development. Furthermore, if consented, the proposed development would also require an Environmental Permit which would be issued and monitored by the Local Authority. See Section 8 of the report which assesses the impact of the proposed development, including in relation to contamination and flood risk and drainage.
14.	Importation of toxic chemicals to this site for the first time. Atmospheric pollution caused by cement dust would endanger health of the residents. Concrete batching will bring toxic, caustic materials (cement) onto a previously un contaminated site.	Prior to the operation of the rail freight facility the site was occupied by a number of units including scaffold storage, car breakers, car repair merchants who sub-let the site from Eurostorage. Prior to this, the site has historically formed part of Network Rail’s operational railway land. Some of these historic uses lead to contamination of the land. Section 8 of the Committee Report sets out how the application has been assessed in terms of potential impacts on air quality, noise, landscape and visual impact, transport and vehicle movements. Paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
15.	There are several schools nearby (Our Lady of Grace, At.Agnes, Claremont, Child's Hill, Whitefield, Mora) all of whom will clearly be affected by the inevitable air pollution and noise.	See response to Issue 12 above.

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16.	Reducing the height of the proposal does not alter the fact that this planning application is for a proposed change of use of the site from transfer of materials to manufacture of a toxic, hazardous and environmentally damaging material.	The application is being assessed on its own merits. Section 8 of the Committee Report sets out how the application has been assessed in terms of potential impacts on air quality, noise, landscape and visual impact, transport and vehicle movements.
Amenity Impacts: Air Quality - Dust		
17.	We thought there was some monitoring system in place at the moment to monitor the air quality but no one has reported back to us with the results.	The operator of the aggregate and construction waste rail transfer facility (DB Cargo (UK) Ltd) have established a website which continually publishes air quality and noise monitoring levels at the site (https://uk.dbcargo.com/rail-uk-en/Our-Company/sustainability/Noise-data). DB Cargo (UK) Ltd are also required to produce monthly monitoring reports for review by the Council's Environmental Health Officer. The latest report was issued to the LPA at the beginning of January 2021 and, to date, no exceedances of the agreed thresholds have been reported.
18.	The facility proposal is open (not enclosed) and toxic carcinogenic dust will be distributed to the many residential homes and primary school that surround this site. Dust suppression systems currently on site clearly don't work as frequently dusts blows from the site to our windows and the site access road is regularly covered in dust.	The proposed development is for the construction and operation of a concrete batching facility which is to be located within an existing and operational aggregate and construction waste rail transfer facility. See Section 8, paragraph 8.33 in relation to the process for delivery, transfer and storage of cement which is an entirely enclosed process. Paragraph 8.34 sets out the separate Environmental Permitting process which is also required in relation to the handling of cement.
Amenity Impacts: Noise		
19.	It is undeniable that concrete batching will generate a lot of noise. Will add even more noise to DB Cargo's noise pollution.	See paragraphs 8.39 – 8.45 of the Committee Report for an assessment of the potential impact of noise. The Applicant has prepared and submitted a Noise Impact Assessment which considers the likely noise impacts of the proposed development on Plot 3 in view of the existing noise emissions (and mitigation) associated with the wider aggregate and construction waste rail transfer facility. Utilising the background levels established by the aggregate and construction waste rail transfer facility and noise data obtained from an existing operational concrete batching facility (at Silvertown), the Applicant has modelled predicted noise levels from the proposed development at the nearest residential receptors at Fellows Square and within the Railway Terraces. This includes consideration of the

Issue No.	Summary of Issue/Representations Received	Officer Response
		mitigating effects provided by both the existing acoustic mitigation measures associated with the aggregate and construction waste rail transfer facility, in addition to the Applicant's proposed mitigation which includes a 3-metre high acoustic barrier positioned around part of the concrete batching plant.
Amenity Impacts: Lighting		
20.	The lighting on the plot now shown on the proposed plans risks creating more light pollution towards our windows in the Railway Terrace cottages.	See paragraph 8.38 of the Committee Report. The proposed development includes the erection of 8no. new lighting columns within Plot 3. These would be in addition to the external lighting previously consented under planning permission 17/5761/EIA. The proposed light new lighting columns would stand at a height of 8 metres above ground level (the same as the light columns consented) and the light fittings would be the same as those previously approved for the aggregate and construction waste rail transfer facility – Tamlite Stadia LED lighting – and the submitted plan referred to above demonstrates that all lighting would face inward from Plot 3's boundaries. Draft Condition 9 in Appendix A limits the lights to only be on during operational hours.
VISUAL IMPACT / URBAN DESIGN AND HERITAGE		
21.	The Railway Terraces are a unique conservation area in London - worth protecting and preserving for the community and future generations.	See Paragraphs 8.46 - 8.51 of the Committee Report for an assessment of potential impact on heritage assets. The Conservation Area's significance is directly attributable to the railway heritage of Cricklewood. It has not been uncharacteristic for land within the vicinity of this heritage asset to accommodate industrial type uses.
22.	Remind you that the planning committee only agreed to the original Rail Freight Facility, after councillors insisted on mitigating the visual impact by means of the very high Eco Barrier. This eco barrier is faulty and failing, even fallen down in places, and its future repair is far from certain. Even if repaired, it is still not high enough to hide the view of the proposed concrete plant from my bedroom window. If it can be seen in direct view, noise and dust will inevitably trouble us too.	See Paragraph 8.52 – 8.54 of the committee report. Draft Condition 2 set out in Appendix A of this report prevents the concrete batching operation commencing until the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site has been completely reinstated or replaced with an alternative acoustic barrier that achieves the necessary level of acoustic attenuation as required by planning permission 17/5761/EIA (as amended 19/3098/NMA).

Issue No.	Summary of Issue/Representations Received	Officer Response
23.	The reduction in height on the revised plans still leaves it too tall to be successfully shielded. Whilst the reduction is an improvement, it remains far too high for an ugly industrial plant on elevated ground so close to a residential community such as the railway terraces.	See Paragraphs 8.46 - 8.51 of the Committee Report for an assessment of potential impact on heritage assets. The Conservation Area's significance is directly attributable to the railway heritage of Cricklewood. It has not been uncharacteristic for land within the vicinity of this heritage asset to accommodate industrial type uses. It is considered that the proposed development would not result in any substantial harm to the setting of the Conservation Area.
24.	We have not been told what is going to replace the eco-barrier. The application should not be considered at all until the size, quality and appearance of the replacement ecobarrier has been finalised.	See Paragraph 8.52 – 8.54 of the committee report in relation to the status of the Eco-Barrier. Draft Condition 2 set out in Appendix A of this report prevents the concrete batching operation commencing until the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site has been completely reinstated or replaced with an alternative acoustic barrier that achieves the necessary level of acoustic attenuation as required by planning permission 17/5761/EIA (as amended 19/3098/NMA). DB Cargo have been in contact with the Railway Terraces RA to keep them updated on progress with the review of the collapsed wall and will be sharing their plans for the replacement barrier with them in the coming weeks.
25.	Barnet Council should make sure this is repaired or replaced before any application for a concrete batching plant is considered. How can you be confident you can mitigate the risk of this plant when mitigations failed in the original application?	See Paragraph 8.52 – 8.54 of the committee report. Draft Condition 2 set out in Appendix A of this report prevents the concrete batching operation commencing until the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site has been completely reinstated or replaced with an alternative acoustic barrier that achieves the necessary level of acoustic attenuation as required by planning permission 17/5761/EIA (as amended 19/3098/NMA).
26.	Will add visual pollution to a skyline that is already full of visual pollution.	See Paragraphs 8.46 - 8.51 of the Committee Report for an assessment of potential impact on heritage assets. The Conservation Area's significance is directly attributable to the railway heritage of Cricklewood. It has not been uncharacteristic for land within the vicinity of this heritage asset to accommodate industrial type uses. It is considered that the proposed development would not result in any substantial harm to the setting of the Conservation Area.

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TRANSPORT		
Transport – Traffic Increase and Congestion		
28.	Traffic already at bursting point on the A5. With increase in movement already from DB Cargo the road is already congested. There would be an increase of large vehicles onto Edgware Road.	See response to Issue 13 above. See paragraphs 8.55 – 8.62 for an assessment of highways impact. It should be noted that the number of HGV movements from the proposed concrete batching plant will be capped within the overall limit of HGV movements controlled by planning permission 17/5761/EIA (as amended 19/3098/NMA). i.e. the proposal will not result in an increase in HGV movements above those already consented at the RFF site. Draft Condition 23 in Appendix A of this report ensures that when combined with HGV movements associated with the development approved under planning permission 17/5761/EIA (as amended), the maximum permitted number of Heavy Goods Vehicles (HGVs) movements (any vehicle over 3.5 tonnes unladen weight) utilising the site access off the A5 Edgware Road shall together not exceed 452 per day (226 in and 226 out) Mondays to Fridays and shall not exceed 264 per day (132 in, 132 out) on Saturdays.
OTHER COMMENTS		
29.	If this application were to be approved, the original permission for the entire site would be void based on its conditions set by Barnet at the time.	This is a separate application from the planning permission for the wider RFF site. The development proposals have been considered in conjunction with the development approved under 17/5761/EIA (as amended 19/3098/NMA) and this application is capable of being determined.
30.	I would like to know what percentage of planning applications have been approved in Cricklewood compared to the rest of Barnet?? It must be far higher than other areas.	This is not a relevant consideration in the determination of this application.