

APPENDIX B: SUMMARY OF PUBLIC REPRESENTATIONS RELATING TO 21/3936/FUL

Table 1: Summary of Public Representations

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:	85
Number of Objections:	85
Number of Support Comments:	0

Issue No.	Summary of Issue/Representations Received	Officer Response
PRINCIPLE OF DEVELOPMENT		
Principle of Development – General Comments		
1.	<p>Proposal is for Heavy Industry. It would introduce industrial manufacturing to the area bordered by residential homes.</p> <p>This is not nor ever has been a Heavy industrial site nor area.</p> <p>This is a residential area and we do not want to live next to an industrial site.</p> <p>The peace and tranquillity of our conservation area and community will be affected by this industry</p>	<p>See paragraphs 7.2-7.20 of the committee report in respect of the principle of development. “Heavy industry” is not a term defined within the Town and Country Planning Act 1990. The operation of a concrete batching plant falls within the B2 Use Class of the Town and Country Planning Use Classes Order, which is general industrial use and would be consistent with the character of the immediate surrounding uses of the site which include industrial B1 and B8 uses as well as retail and a bus garage and significant rail infrastructure. It would also accord with the established policy designation set out in Barnet’s Local Plan which identifies the site as suitable for B2 and B8 uses which is also reflected in the Section 73 Planning Permission for BXC which granted outline</p>

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		<p>permission for the construction of associated Industrial/Storage & Distribution (Classes B2 and B8) uses alongside the Rail Freight Facility. The Site is located within an urban area with a wide variety of built forms and land uses. Existing residential neighbourhoods are located further away from the site, over 200m in some cases, and beyond other existing industrial buildings and uses. The proposed concrete batching plant land use is therefore considered to be an appropriate land use for the site and would not be incongruous with its immediate surroundings.</p> <p>In respect of the nearest sensitive receptors, Officers are satisfied that the submitted information taken together with the mitigation measures and conditions either proposed by this Application or otherwise secured by the aggregate and construction waste rail transfer facility planning permission, demonstrate that the proposed development would not cause any significant adverse harm in respect of air quality, noise, the setting of the nearby Conservation Area, townscape and visual impacts and the water environment.</p>
2.	<p>Clause 5 of DB Cargo's Planning Permission specifies that 'no material other than aggregates and non-putrescible construction waste shall be imported to, stored at or exported from the site.' The reason stated was: 'To ensure that the proposed development does not prejudice the amenities of occupiers of adjoining residential properties. Now DB Cargo wants to forget that clause, introduce heavy manufacturing industry to Cricklewood and import, store and process toxic cement on the site, alongside our homes, opposite a school and in a community where thousands of new homes are proposed, in both Barnet and Brent.</p> <p>DB Cargo does not have permission to undertake or permit manufacturing processes on the land. DB do not currently have permits to process concrete on the site and their current processes do not involve toxic chemicals.</p>	<p>Planning Permission 17/5761/EIA (as amended) granted permission for the aggregate and non-putrescible (construction) waste rail transfer facility (the RFF site). It did not seek permission for batching of concrete, hence why CCL have submitted this application which seeks planning permission for that process and the plant and equipment associated with it. The application is supported by relevant air quality, noise, townscape and visual assessments and information to demonstrate that the proposed development would be acceptable in Planning terms when controlled by the conditions recommended in Appendix A of the committee report. Furthermore, an Environmental Permit for the operation at the site has been granted by the Council's Environmental Health Service in relation to the storage and use of cement which is regulated by the Environmental Permitting Regime.</p>

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3.	Barnet council is more interested in the money they will make from it rather than the wellbeing of residents.	The planning application has been submitted by Capital Concrete London Ltd. The Local Planning Authority has a statutory duty to assess and determine planning applications. The London Borough of Barnet will not make money from the operation of the site.
4.	<p>Cricklewood is not an industrial area and is being redeveloped at an incredible rate to have more residential units and a new town centre, this would put it a step back.</p> <p>The new Town Centre and modern buildings are going to make Cricklewood more desirable to many people, a Concrete plant just doesn't fit in to say the least and will ruin the area and cause more pollution from all the heavy vehicles making the low traffic schemes being implemented a joke</p>	The application has been assessed on its merits, taking into consideration all relevant material considerations including an assessment of residential amenity and townscape and visual impact. The proposal is considered to be compliant with relevant planning policies and found to be acceptable. In respect of the nearest sensitive receptors, Officers are satisfied that the submitted information taken together with the mitigation measures and conditions either proposed by this Application or otherwise secured by the aggregate and construction waste rail transfer facility planning permission, demonstrate that the proposed development would not cause any significant adverse harm in respect of air quality, noise, the setting of the nearby Conservation Area, townscape and visual impacts and the water environment.
5.	There are plenty of other concrete plants nearby already.	<p>See paragraphs 7.75-7.79 of the committee report. The Applicant has provided information to show the area covered by deliveries from the former Brent Terrace concrete batching plant, which closed earlier in 2021. The concrete which would have been supplied from the Brent Terrace site into the Barnet market area is currently being supplied from plants at Wembley, Neasden, and Edmonton with 50% of this supplied by the Applicant and 50% by other companies. This is resulting in HGVs having to drive additional distance to serve this demand.</p> <p>The proposed concrete batching plant seeks to take advantage of, and operate within the confines of, the existing RFF where aggregates are able to be imported by rail and fed into the batching plant to create concrete. If consented the proposed development would remove approximately 17,106 HGV road miles per month from local roads, which equates to 205,275 HGV road miles per year. The proposal will enable the local demand for concrete to be met with fewer road HGV miles and lower emissions and congestion.</p>

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Principle of Development – Location		
6.	<p>Not appropriate for this area of Cricklewood. Inappropriate next to a conservation area, so close to the Cricklewood terraces. This is a residential conservation area which will be impacted by having an unprecedented industrial unit next to it.</p> <p>The arrival of an industrial concrete batching site will make things worse by ruining the air quality, increasing the noise and causing severe disruptions to the traffic.</p> <p>The area is growing and developing as residential. It is not appropriate to slap a concrete batching plant in the middle of it. If granted it would bring toxic substances to a site which is fast being surrounded by even more residential units.</p> <p>Cricklewood is predominantly a residential area and this will be increasingly the case with the current applications to construct very large numbers of flats</p> <p>Cricklewood is not an area for heavy industry such as Concreting Batching Plant.</p> <p>This is a residential area, with primary schools in close proximity.</p> <p>The introduction of heavy industry into this part of NW2 is unprecedented and not ideal being so close to an infants school. Previously there has been light industry only on this site and manufacturing/retail/ light industry in the surrounding area.</p>	<p>See response to Item 1 and Item 5 above.</p> <p>Refer to paragraphs 7.2-7.20 of the committee report in respect of the principle of development, paragraphs 7.43-7.56 of the committee report in respect of air quality assessment.</p>

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AMENITY IMPACTS		
Amenity Impacts: Air Quality – General Comments		
7.	<p>The air quality will decline further when this concrete batching plant is placed. This is unacceptable as levels of pollution in the general London area are already above WHO recommended levels, and Barnet is already one of the four councils where air pollution is most extreme in London, causing deaths.</p>	<p>Refer to paragraphs 7.43-7.56 of the committee report in respect of air quality assessment. 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> <p>It is noted that impact on air quality was not a reason for refusal for the previous application which was found to be acceptable in respect of the assessment and mitigation measures proposed for the concrete batching facility.</p>
8.	<p>This is pushing the boundaries of legality and with all the clean air promises by the government, council, mayor etc, this is going in completely the opposite way.</p> <p>It is a major objective of the mayor's office to improve air quality.</p>	<p>Improving air quality is a key priority for London and this application will contribute to reducing air pollution by reducing the number of HGV trips. This application will enable concrete to be manufactured on Plot 3 of the RFF site utilising the aggregate that is already permitted to be imported by rail to the RFF. Moving goods and material by rail is significantly less polluting and more sustainable than by road. Rail freight produces 76% less CO2 and 90% lower particulate emissions than the equivalent road journey. If consented the proposed development would remove approximately 17,106 HGV road miles per month from local roads, which equates to 205,275 HGV road miles per year. The proposal will enable the local demand for concrete to be met</p>

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		with fewer road HGV miles and lower emissions and congestion, thereby contributing towards the objectives to improve air quality.
9.	The air quality monitoring in the vicinity of the Railway Cottages has been haphazard overall and has never recorded accurately this extremely important environmental factor.	The operator of the wider RFF 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 to be positioned at the nearest sensitive receptor within the Railway Terraces. Whilst DB Cargo has experienced difficulties in erecting the off-site monitoring station and dust gauge on third party land, aggregate and construction waste transfer operations on Plots 1 and 2 of the facility have been measured since commencement of the RFF operation 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.
Amenity Impacts: Air Quality – Dust and Health Risks		
10.	<p>A permanent concrete batching plant would represent an utterly unacceptable risk from carcinogenic cementitious dust, collected and carried by a totally uncontrollable wind, all day and night, every day of the year.</p> <p>The current operations involve only non-toxic material. Concrete batching will bring toxic, caustic materials (cement) within a stones throw of people's homes.</p>	<p>Refer to paragraphs 7.43-7.56 of the committee report in respect of air quality assessment.</p> <p>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</p>

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	<p>Putting vulnerable residents at risk of breathing in toxic concrete dust and fumes.</p> <p>Cement dust in a resident area would be catastrophic.</p> <p>Cement dust is toxic and will cause the air quality to deteriorate. Concrete batching involves toxic materials and is a hazard to the local community. There is a fundamental issue with the importation (for the first time) of toxic chemicals to the site for the purpose of the manufacture.</p> <p>These batching plants release toxic dust into the atmosphere, which spread far and wide, despite attempts to limit this with 'dust suppression sprinklers'.</p> <p>Concrete batching will bring toxic, caustic materials (cement) onto the site. Breathing in toxic dust.</p> <p>This concrete batching plant, if erected, would release harmful pollutants into the air that these infants would then have to breathe.</p> <p>The facility will mean that hazardous materials are IMPORTED by road onto the site for the first time with the added risks of pollution and contamination (cement is needed to make concrete and is currently not delivered to the site. The building waste that currently is imported by road is non-putrescible non-hazardous waste that is graded off-site before being imported).</p> <p>Toxic materials will be processed on the site giving rise to pollution and impact on air quality.</p> <p>The planners clearly couldn't care less about the health and well being of local residents.</p>	<p>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). 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-S8-P11 (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 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.</p> <p>In respect of the delivery and storage of cement, this will be delivered to the site by tanker and pumped pneumatically into the cement silos which are completely sealed. The silos and tanker are fitted with a negative pressure system which prevents cement dust escaping. Furthermore, the 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 concerns from residents, 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.</p> <p>The proposed concrete batching facility would be subject to an Environmental Permit in line with the Environmental Permitting Regulations 2016 and, in accordance with paragraph 183 of the NPPF,</p>

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		<p>the planning system should not seek to duplicate or control processes or emissions subject to separate pollution control regimes. The Council's Environmental Health Officer has confirmed that a Part B Environmental Permit has been granted to the Applicant for the proposed site. The Environmental Health Officer has confirmed that as part of the Part B Permit the operation would be monitored including inspections twice a year and review of dust mitigation measures.</p>
Amenity Impacts: Air Quality – Assessment and Modelling		
<p>11.</p>	<p>All of the projected air quality tests have clearly not been carried out properly, are quite obviously 'cooked' to give the planners the results they want. Where is the data from actual sites?</p> <p>The air pollution modelling has not been based on samples taken at an analogous site but on purely hypothetical models. And given the close proximity of the site to our school, it could have a detrimental impact on the children.</p> <p>The air quality analysis is based on assumptions and inadequate data analysis and has been verified by the organisation which was the original source of the problems/oversights/inadquacies.</p> <p>The air quality modelling in the application does not use information from sites which are operating as concrete batching facilities, so are not valid comparisons. Air quality objectives are not up to date or based on modern air quality standards.</p>	<p>The Applicant provided a technical response note from GL Hearn to address the comments about the robustness of the air quality modelling. This confirmed that the dust assessment follows the IAQM's Mineral Dust Guidance, which is considered suitable for the activities on site for a concrete batching plant and is approved by the IAQM for such use. The details of this assessment allow for the size of dust particle to be considered, i.e. whether it is smaller such as sand or gravel or larger such as materials from quarries. It is, therefore, considered that the onsite materials and their potential dust emissions have been considered appropriately in the dust risk assessment, which in turn, recommends suitable mitigation.</p> <p>The latest National Air Quality Objectives (NAQOs) are those based on standards introduced in 2005 and 2010. There has been no update to the NAQOs in the meantime. Whilst it is recognised that these targets have not been achieved nationally, it is common practice to utilise the latest NAQOs in air quality assessments.</p> <p>It is considered that all reports, including GL Hearn's air quality report is robust enough to provide a representative assessment to recommend suitable mitigation. This can be considered through DB Cargo's application and the mitigation recommended to reduce dust and air quality impacts. The ongoing monitoring being undertaken by DB Cargo shows no dust concerns, therefore, the recommended mitigation is shown to be robust.</p>

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Amenity Impacts: Noise		
12.	<p>There will definitely be a negative impact on the area, including noise pollution and an increase in the already poor air quality.</p> <p>The plant will generate a lot of noise - additional to the already very loud freight trains which pass through the area.</p> <p>Concrete batching will generate a lot of noise (constantly), adding to the noise from DB Cargo's operation. With the recent adoption of working from home this will severely impact residents work life as well as home life. The increase in noise would have a detrimental impact on the surroundings.</p> <p>This will also be a noisy operation which will be audible from the Railway Cottages.</p> <p>Noise and dust from the transfer of aggregate from the rail freight train to the proposed site.</p>	<p>See paragraphs 7.58-7.68 of the committee report in respect of assessment of noise impact.</p> <p>The Council's Environmental Health Officer 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. This includes the proposed 3-metre high acoustic barrier to be erected along the southern boundary of Plot 3 and the Acoustic barrier at the southern end of the RFF site. The replacement Acoustic barrier at the RFF site as approved under application 21/3828/NMA, achieves the required noise mitigation levels specified in the planning permission for the RFF. The technical performance of the replacement barrier has been factored into the Applicant's assessments as part this planning application for the proposed concrete batching plant and it forms part of the package of mitigation measures in respect of noise, landscape impact and visual amenity. For this reason, the full installation of the whole of the replacement structure will be required prior to the commencement of any concrete batching plant operations.</p> <p>The noise model used to predict noise levels generated by Capital Concrete is based on measurements carried out at the Silvertown site also run by Capital Concrete which was suggested as a good reference for comparable machinery and noise levels. GL Hearn have confirmed that the measured noise levels which have subsequently been used as inputs into the model have been compared to measurements obtained at other concrete batching plant sites by other acousticians and they were very similar. It is therefore assumed that the noise sources used for the assessment are adequate.</p>
13.	<p>DBCargo have not fulfilled their current obligation to repair their acoustic barrier. No timescales for the replacement of the barrier.</p>	<p>See paragraphs 7.21-7.23 of the committee report in respect of the replacement Acoustic barrier.</p>

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	<p>This application should not even be considered by Barnet council until the eco-barrier has been fully reinstated and trees and shrubs established in front of it.</p> <p>Until this barrier is fully established and can protect our quality of life we cannot be subjected to more dirt and dust from the site.</p>	<p>Draft condition 2 in Appendix A of the committee report requires the acoustic barrier positioned along the southwest boundary of the Cricklewood Railway Yard site to have been completely reinstated or replaced with an alternative acoustic barrier approved by the LPA, before the proposed concrete batching operation can commence.</p>
14.	<p>Proposals for a concrete batching plant have not taken account of the pending planning permission on the Matalan site or the wider site allocation; there is no recognition in any of the application supporting documents of these significant developments. Specifically, the air quality assessment, noise impact assessment, dust assessment and visual analysis fail to recognise these important developments. Therefore, the applicant has failed to demonstrate that the proposal will not have a detrimental impact on, inter alia, residential amenity.</p>	<p>The Applicant submitted a technical note prepared by GL Hearn (20 October 2021) which responded to the comments raised by the Developer of the Matalan site. They compared their assessment to the baseline noise levels reported in the noise impact assessment submitted by Ziser London (the Developer for the Matalan site) for their own planning application. The predicted noise levels due to Capital Concrete's operations are estimated to be 44 dB at the top floor (assumed 22.5 metres above ground level) and 34 dB at ground floor. These levels are predicted at the façade closest to Capital Concrete's development. The area is already subject to a mix of commercial and industrial activity, with distant noise from rail and evident dominant influence of road traffic noise. Both these levels are considerably lower than ambient noise levels, and lower than background noise levels at these positions. Therefore no adverse effects are expected at these locations in respect of the Matalan development, especially considering that the building has already allowed for noise mitigation to be embedded into the façade fabric.</p>
VISUAL IMPACTS		
15.	<p>The proposed development would cause harm to the setting of the adjacent Cricklewood Railway Terraces Conservation Area and would not preserve or enhance the character and appearance of that Conservation Area.</p> <p>The new heritage assessment claims that the building will have no impact upon us. This is inaccurate and untrue as the site will be visible from the terraces</p>	<p>Refer to paragraphs 7.25-7.42 of this report for the assessment of visual impact.</p> <p>Officers are satisfied that the amendments made to the proposed configuration of the concrete batching plant, moving it further away from the Railway Terraces Conservation Area, combined with the reduction in height of the tallest elements and the presence of the Acoustic Barrier on the southern boundary of the RFF site, mean the</p>

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	<p>Despite the fact that it has been reduced in height and reorientated, the development remains too high and will be visible, both above and to the sides of the replacement eco-barrier.</p> <p>The revised plans make minimal difference to the height of the cement silos (a mere 50cm), so these buildings will still be visible from the Railway Terraces Conservation Area.</p> <p>The site will be clearly visible from the terraces. The building will have a great visual impact on the terraces.</p> <p>The building is still too high with the hopper still 15 m tall and some of the buildings will be seen above and to the side of the eco-barrier.</p> <p>This application has been altered very little from the one already rejected. The proposed structures would still be visible by the surrounding residential areas.</p>	<p>proposal will not have a direct visible impact on the character or setting of the Railway Terraces Conservation Area.</p>
CONTAMINATION		
16.	<p>Water suppression system would contaminate the land in the form of wedge pits. The run off from dust suppression could easily contaminate the surrounding land.</p>	<p>Paragraph 3.29 of the Supporting Statement submitted with the application confirms that the water used to clean the drums of the mixer lorries is not discharged into the water system and the surrounding area. The dirty water is discharged into purpose-built settlement or wedge pits. Periodically, these pits will be emptied, and any sediment is either fed back into the plant or taken off Site with it being recycled where possible.</p>
PUBLIC ENGAGEMENT		
17.	<p>The consultation process has been patchy and the consultation period too short for a significant development such as this.</p>	<p>The application has undergone the statutory consultation period in accordance with Article 15 of the Development Management Procedure Order (2015) (as amended). Furthermore, the application</p>

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		and related documents have been available to view for over 5 months since registration and notification. The Applicant undertook a pre-application consultation exercise prior to the submission of the original application and engaged with many interested parties and considered the comments raised, which resulted in significant changes being made to the design of the plant to try and address the concerns raised by interested parties.
TRANSPORT		
Transport – Safety		
18.	The increase of HGV traffic on the A5, could make it more unsafe for our children. Especially as we encourage them to walk and cycle to school.	Refer to paragraphs 7.75-7.85 of the committee report with respect of transport impact. The proposal will not lead to an increase in HGV trips compared to the planning permission already in place for the RFF site which is limited to a maximum of 452 HGV movements per day (i.e. 226 in, 226 out) Mondays to Fridays, which governs all HGV movements arriving and departing from Plots 1-4 including the application site. The proposed trips resulting from the concrete batching plant amount to 25% of that overall limitation. The application proposes to operate within the confines of this wider site limit and, as such, the proposed development would not generate any additional HGV trips on the highway network.
19.	Inconsiderate drivers of large vehicles turning into the site from the A5 and paying little regard for pedestrians. This would increase if this proposal went ahead.	See response to Item 18 above. The proposal does not result in additional HGV movements compared to the
Transport – Traffic and Congestion		
20.	There would be an increase in road traffic due to the all of the activity that would be involved with transporting materials to and from the concrete batching plant. This increase in road traffic would also mean an increase in air pollution.	Refer to paragraphs 7.75-7.85 of the committee report with respect of transport impact. The proposal will not lead to an increase in HGV trips compared to the planning permission already in place for the RFF site which is limited

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	<p>Inevitably such an industrial site would give rise to a huge increase of HGV traffic on the already crowded A5.</p> <p>More lorries, more cars, more noise in an already very congested area.</p> <p>It will still bring additional traffic in the main roads and the surrounding areas. The existing roads in Cricklewood are not capable of holding the additional traffic and already the current traffic creates congestion on a daily basis causing misery and extreme inconvenience to the residents and the businesses.</p> <p>Too many vehicles using already over crowded A5; Potholes caused by so many trucks. Noise; Dirt and dust from the site. Apart from the busy A5 the area is a quiet residential area.</p>	<p>to a maximum of 452 HGV movements per day (i.e. 226 in, 226 out) Mondays to Fridays, which governs all HGV movements arriving and departing from Plots 1-4 including the application site. The proposed trips resulting from the concrete batching plant amount to 25% of that overall limitation. The application proposes to operate within the confines of this wider site limit and, as such, the proposed development would not generate any additional HGV trips on the highway network.</p>