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Barnet Council
Planning Services
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London
N20 0EJ

Our Ref: **2017/7074/P**

Your Ref:
Please ask for: **Ben Farrant**
Telephone: 020 7974

5 January 2018

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - Objection

Address:

Cricklewood Railway Yard

**Land R/O 400 Edgware Road
NW2 6ND**

Proposal:

Observations on Barnet Application ref: 17/5761/EIA for 'Use of railway land for the transportation of aggregates and non-putrescible waste (construction) by rail including dismantling and removal of lighting tower; levelling of site and provision of landscape bund; 2no. open stockpile areas each containing 10 storage bins and 2no. partially enclosed stockpile areas each containing 10 storage bins; acoustic and perimeter fencing; CCTV, security hut, welfare hut, a weighbridge, 2 no. wheel wash facilities, dust suppression system, drainage, parking for HGVs and cars, traverser road, replacement rail track sidings, continued use of existing building for staff and welfare facilities; and other infrastructure and ancillary works including alterations to the existing access to Edgware Road and provision of new landscaping. (Part Retrospective)'

Drawing Nos: N/A

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises objection for the following reason(s):



Reason(s) for Objection

The current proposal has been reviewed by Camden Council's Programme Manager for the North London Waste Plan (NLWP). The NLWP is being drawn up by seven boroughs - Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest to identify sufficient land for facilities to manage North London's waste for the next 15 years. There is currently a rail based aggregates depot with related concrete batching plants at the back of the Kings Cross development in Camden.

Whilst not being central to the NLWP, removing inert construction waste by rail could assist in the management of waste in North London. Though construction waste is increasingly processed and/or re-used on site, a lot of excavation waste in north London is difficult to re-use; this is exported and used as capping for landfill sites. There are only a limited number of landfill sites in London and so sites outside the city are used: having a rail based facility to take such waste out of London to rail based landfill or other processing sites would therefore be beneficial in principle. Similarly the supply of aggregates to enable construction in London is a key strategic issue, as there are only a limited number of quarries in the very west and very east of the city. The incoming aggregates would support construction expected as part of the residential and employment growth in London and the wider south east. Given the above, the proposal is therefore considered to be acceptable in principle; however there are amenity concerns, on the grounds of which Camden Borough Council must object to the application.

There is an acknowledged dust and air quality issue in the reports accompanying the application with some mitigation proposed. Revisions have been received to enclose two of the plots, but the others remain open, including the one for the storage of construction waste prior to removal. Therefore the facility is not totally enclosed, contrary to Policy SI8 D 4 (Waste capacity and net waste self-sufficiency) of the emerging London Plan which states "where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed". This emerging London Plan policy is similar to policy contained within the emerging NLWP. Camden's Environmental Health team similarly raises objection to the application on air quality and dust pollution grounds, where this would cause harm to nearby residents, and the air quality is already poor and part of an air quality management plan. An estimated 800 daily lorry movements are proposed at the site (a similar number to the construction of HS2 at Euston at peak operation), meaning there would be a significant impact on increasing Nox levels in this area. This cumulative impact on an already noisy area with poor air quality both in terms of particulates and Nox could result in significant harm to residential amenities.

Following a review by the Council's Environmental Health team, objection is further raised in relation to the potential impact of noise, vibration, and light pollution both during construction and operation, as well as a lack of information submitted with regards to pest proofing, contaminated land assessment, and a Construction

Management Plan.

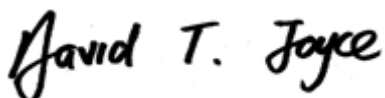
Due to the close proximity of the operational railway site, construction works may have to be completed during possession periods (between midnight to 5am and at bank holidays) which would increase the noise disturbance to nearby residents. Similarly the acoustic assessments are of concern with the proposed operation at night for loading and unloading spoil and waste onto trains and lorries, which is likely to result in undue harm to the residential amenities of nearby residents. Whilst mitigating acoustic fencing and bunds are proposed, the existing residential units would overlook the proposed commercial site and would not therefore be acoustically protected. The vibration impact from trains and lorries running at sensitive times, such as night, and loading operations is also of key concern.

Given the above assessment, Camden Borough Council vehemently objects to the application; however should Barnet Planning Officers be minded to recommend approval of the scheme, the following is advised:

- The site should be fully enclosed to mitigate air quality, dust and noise impacts in accordance with Policy SI8 D 4 of the draft London Plan and emerging NLWP
- The number of vehicles daily permitted at the site should be limited
- Vehicles should have only the most modern engines to limit pollution control
- Vehicles should conform to Transport for London's 'Direct Vision Standards' to improve road safety
- A Construction Management Plan would be required
- More information would be required with regards to light pollution during construction and operation
- Pest proofing control of the site is required
- Information should be submitted with regards to Contaminated Land Assessments

On the basis of the submitted information, the development is therefore considered objectionable. It is requested that the application is refused unless the above concerns can be adequately addressed.

Yours faithfully



David Joyce
Director of Regeneration and Planning