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Dear Sir / Madam,

**RE: North London Waste Plan Main Modifications**

Thank you for providing the opportunity to comment on the North London Waste Plan Main Modifications.

Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL CD have engaged through the Local Plan preparation process and submitted representations on the Proposed Submission North London Waste Plan Regulation 19 (January 2019).

TfL CD has raised issues in previous representations submitted as part of the Regulation 19 consultations. It is not clear from consultation statements and the various background documents how the points TfL CD have raised have been considered, and the key ongoing point of contention is set out below.

**MM5, MM52, MM79 and MMI 15**

Transport for London own the freehold to the Temple Mills Lane Bus Depot site, which is designated as a Locally Significant Industrial Site and is an active bus depot. The Intend to Publish London Plan Policy T3 states that development plans and decisions should seek to safeguard existing land and buildings used for transport-related support functions to ensure sufficient provision of transport infrastructure to serve London's needs. Relevant parts of the policy are underlined in the extract below:



*B Development Plans and development decisions should ensure the provision of sufficient and suitably located land for the development of the current and expanded public and active transport system to serve London's needs, including by:*

*1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)*

*2) identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing*

*3) safeguarding London's walking and cycling networks*

*C Development Plans should appropriately safeguard the schemes outlined in Table 10.1. Development proposals should provide adequate protection for and/or suitable mitigation to allow the relevant schemes outlined in Table 10.1 to come forward. Those that do not, or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused.*

*...*

*E Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.*

The National Planning Policy Framework 2019 paragraph 102 and 104 require that plan-making and policies identify and pursue opportunities to promote public transport use and provide for the infrastructure and wider development required to support public transport operation, expansion and contribution to the wider economy.



TfL is required by the Mayor of London to ensure all buses are zero emission by 2037 which requires the reconfiguration of depots to provide for hydrogen and electric fuelling. TfL are progressing a number of schemes across London which will see the redevelopment of a bus depot with residential above in line with the Intend to Publish London Plan Policy E7, with the residential providing the funding to enable TfL to upgrade the bus depots. Electric fuelling will take up more space than is currently taken up for diesel fuelling and the Mayor has also set out objectives to increase bus services by 40% by 2041 which also pushes up space requirements, some of which can be addressed through more efficient layouts but ultimately will still require some expansion of current facilities.

The site is also located within both the Lower Lea Valley and Olympic Legacy Opportunity Areas. The Olympic Legacy Opportunity Area targets 39,000 homes and 65,000 jobs, and this site could contribute to this target.

TfL CD are concerned that the allocation may constrain future potential redevelopment of the site which could facilitate improved public transport and sustainability objectives, and the provision of homes and jobs to support wider area objectives and growth.

We therefore reiterate our request that the designation of Temple Mills Bus Depot is removed from the DNLWP, to support the future development potential of the site and ensure the most effective use of land.

## **Concluding Remarks**

If you need any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.

Yours faithfully,

Chris Ridout

**Assistant Planner, Transport for London Commercial Development**