



North London Waste Plan
Main Modifications

Transport for London
City Planning
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Stratford
London E20 1JN

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09/12/2020

Dear Sir/Madam,

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the North London Waste Plan Main Modifications 2020.

We commented on the draft North London Waste Plan (NLWP) in a letter to you on 22nd March 2019. Further comments here supplement rather than replace or change the ones given in our previous letter.

There are predominantly 2 stages of waste servicing; waste management and waste collection, with the latter having direct impacts on London's highway network. TfL are dedicated to achieving logistical efficiency in waste management facilities in North London through a sound, sustainable waste plan as, in turn, it will result in more efficient waste collection, easing pressures on TfL's and local councils' highway network

Our previous response requested changes which have now been reflected in the proposed main modifications, which is most appreciated.

In summary, we previously raised these specific key concerns:

- **Paragraph 4.25: A replacement rail-based depot which considers the West London Orbital Vision**
- **Paragraph 8.15: Contributions to Crossrail 2 with consideration of the potential site Argall Avenue**
- **Section 9, Policy 2, Table 11: reconsideration of the site Brunswick Industrial park in Barnet, due to the poor access to Strategic Road Network**



- **Section 9, Policy 2, Table 12: The need to secure satisfactory replacement bus garage facilities for Temple Mills Lane should the site of the bus garage be required for waste management**
- **Section 9, Policy 3c: Wording change to include the impact on Opportunity area and transport infrastructure improvement**
- **Paragraph 9.40: Evidence of transport waste viability**
- **Paragraph 9.42: Commitment to the use of FORS and Direct Vision lorries in the NLWP**

TfL are content with the proposed modifications that address our previous concerns. However, some concerns do remain, these include:

- **Section 9, Policy 2, Table 11: reconsideration of the site Brunswick Industrial park in Barnet, due to the poor access to Strategic Road Network**
- **Section 9, Policy 2, Table 12: The need to secure satisfactory replacement bus garage facilities for Temple Mills Lane should the site of the bus garage be required for waste management**
- **Paragraph 9.442: Commitment to the use of FORS and Direct Vision lorries in the NLWP**

Section 9, Policy 2, Table 11

In our initial response, TfL expressed scepticism about the potential of the Brunswick Industrial Park site as a waste collection and management site. This is due to the site's location in a residential area with restricted access to the Strategic Road Network.

In the NLWP Main Modifications, this site is still included as the preferred option for waste management with priority given to waste facility types, A and E. We would therefore expect the final site allocation to include suitable mitigation to address the issues of access.

Section 9, Policy 2, Table 12

TfL expressed concerns about the potential loss of the bus garage facility on this site which is important in maintaining the local bus network. In these NLWP main modifications, Temple Mills Lane remains proposed as a potential future waste facility for types A, B and E. If this would impact on the bus garage operation it is essential that equivalent alternative bus garage facilities are secured within the local area in line with London Plan policy. One option previously identified may be the New Spitalfields market site, but TfL would require firm assurances that any alternative site would be made available before the existing bus garage had to close, to ensure continuity of operation. We therefore remind you that TfL will require confirmation of any replacement bus garage site's availability and feasibility in order for this policy to be implemented.



The site may also be required for train stabling. In principle TfL supports any future waste site being rail-served. However, as train stabling in the London area is very much at a premium this would need to take priority.

Paragraph 9.42

Although TfL welcomes the general approach of the NLWP in supporting the Vision Zero approach including use of Direct Vision vehicles, it is disappointing that there has not been an explicit commitment to the specific requirements of TfL's Vision Zero Action Plan as requested.

We trust that these comments are helpful and look forward to continuing our work together as you proceed towards adoption of the NLWP.

Kind regards,

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TfL Spatial Planning