



<b>To</b>	Examining Authority
<b>From</b>	Melvyn Dresner <b>Principal Technical Planner</b> <b>TfL Borough Planning</b>
<b>Our Ref</b>	TfL's response to the Examining Authority's First Questions
<b>LPA Ref</b>	Development Consent Order
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## **North London Heat and Power Project (NLHPP), Eco-Park, Edmonton**

Transport for London (TfL) has reviewed the Examining Authority's first written questions and requests for information issued on 2 March 2016 and the action points arising from the letter published on 4 March 2016 by the Examining Authority (AP Letter). This letter constitutes TfL's response to the questions which are relevant to its functions and interest in the site. TfL does not wish comment on the remainder of the questions at this stage.

**Q 5.3** TfL has commented on the Code of Construction Practice (CoCP) and has suggested refinements. TfL would seek to minimise peak hour traffic movements as far as practicable, encourage best practice for driver behaviour, ensure appropriate management of lorry movements and lorry routing, and encourage car sharing, walking, cycling and public transport use for construction workers. TfL accepts that the NLHPP aims to meet these objectives. TfL's input is to support strategic transport policy through promoting good practice guidance on Construction Logistics Plans, Travel Plans and Delivery and Servicing Plans and it is TfL's view that these should be applied to the NLHPP.

TfL agrees with point 12 of the AP Letter that the applicant should consider an overarching requirement to deal with the London Borough of Enfield's obligations to consult other bodies, e.g. TfL and the Environment Agency pursuant to Requirements 8 (stages of the authorised development), 10 (provision of landscaping), 12 (access and roads) and 16 (code of construction practice). TfL reiterates that consideration should be given to amend Requirement 16 to ensure that the CoCP applies to enabling works such as 'site clearance'. To this end TfL agrees with point 3 of the AP Letter which requests that consideration be given to include 'site clearance' in the definition of 'commence'. TfL confirms that to the extent the development affects TfL functions as a highway authority the measures proposed for environmental mitigation in the current draft CoCP are satisfactory.

**Q 6.5** This question is not directed at TfL, however, waste stream has been discussed in the context of the use of water freight. The processing of bottom ash is currently on site. As part of the current proposals this activity may move offsite, however, should this activity remain or a new facility for ash processing be provided on site then, due to the proposed lack of water freight in the NLHPP, the onward journey of bottom ash would be by road. Although TfL accepts that on site water freight facilities are not currently envisaged as part of the NLHPP, it is of the opinion that as the North London Waste Authority (NLWA) reviews its options it should review use of water freight for this and



other waste streams – this is a matter of encouraging best practice and is not something that TfL believes can be easily converted into a planning obligation or requirement.

**Q 6.7** TfL has reviewed these assumptions at an early stage and accepts the assumptions and conclusions in the latest Transport Assessment.

**Q 6.8** TfL has accepted these assumptions and the assessed effect. TfL relies on the local planning authority to confirm the status of planning proposals in the area and expects the local planning authority to take into account the changing nature of the area given that the site is within an area of substantial regeneration and there are likely to be a number of development proposals coming forward in the near future.

**Q 6.9** TfL agrees with the proposed mitigation in general. However, through or alongside the CoCP, TfL suggests that a Construction Logistics Plan and a Construction Workers Travel Plan are prepared.

**Q 6.10** TfL expects that the local highway authority would judge this aspect.

**Q 6.11** TfL supports the reduced provision of car parking. TfL expects the car parking that is provided to be in accordance with the London Plan and its provisions relating to disabled car parking, electric vehicle charging points etc. TfL would also expect to see that car sharing is promoted. TfL would support reducing car parking further as long as this could be done without overspill impacts on the local road network or the A406. TfL accepts that there is a need for car access for existing and future staff and visitors using the site.