

Dear Chloe,

**17/5761/EIA**

**Use of railway land for the transportation of aggregates and non-putrescible waste (construction) by rail**

400 Cricklewood Railway Yard, Land At Rear Of 400 Edgware Road Edgware Road Cricklewood NW2 6ND London NW2 6ND

Thank you for consulting TfL on the above application; the aim of TfL response is to ensure that this development is successful in transport terms and in line with relevant London Plan policies. The following comments are made by Transport for London (TfL) officers on a 'without prejudice' basis only. You should not interpret them as indicating any subsequent Mayoral decision on the planning application.

It is stated that this facility is assumed to be constructed between November 2018 and August 2019 and will operational from August 2019. The facility is proposed to help meet London's need for aggregates and movement of construction waste. Therefore, TfL welcomes the provision of facility to support the construction logistics of the wider Brent Cross Regeneration area and other developments in London, removing lorry movements from the wider network.

TfL has oversight responsibility for the adjacent part of the Strategic Road Network – A5 Edgware Road network, whilst Barnet and Brent Councils are the highway authority. TfL is concerned that access to and from this site is safe for all users. Mayor's Transport Strategy seeks to reduce serious and fatal accidents to zero by 2040 (Vision Zero). TfL request a Road Safety Audit be undertaken in co-ordination with the local highway authorities and provided to TfL.

**Air quality**

TfL is also responsible for bus services that use this part of the A5. TfL has designated the A5 as Bus Low Emission Zone, see attached. This should be acknowledged. The Mayor of London has responded to Government's draft Air Quality Action Plan:

[https://www.london.gov.uk/sites/default/files/gla\\_response\\_to\\_defra\\_aq\\_plan\\_final\\_for\\_submission\\_15\\_june\\_2017.pdf](https://www.london.gov.uk/sites/default/files/gla_response_to_defra_aq_plan_final_for_submission_15_june_2017.pdf)

The Mayor of London has also published the Mayor's Transport Strategy and Environment Strategy. These includes measures to reduce emissions from road and rail transport such as Bus Low Emission Zone and Ultra Low Emission Zone. The proposal is to extend the zone to the A406 North Circular Road, so covering this site.

TfL request that the supplementary environmental report and transport report is updated to reflect these policies and the applicant should confirm how the development supports the Mayor's policy on air quality both locally and strategically.

**Healthy Streets approach**

TfL has also identified the A5 as corridor with increased potential cycling, see here <http://content.tfl.gov.uk/analysis-of-cycling-potential-2016.pdf> and <http://content.tfl.gov.uk/strategic-cycling-analysis.pdf>. The reports notes provision for cyclists and pedestrians on the A5 is poor. It notes the Cycle Level of Service (CLOS) is 37 out of 100 with the proposed access. Given the low numbers of employees (9) on site they don't propose to provide segregated cycle route on site.

Given this forms one part of a series of Brent Cross Cricklewood highway interventions on the A5, we need assurance this contributes to improving facilities for pedestrians and cyclists on the A5 as part of the regeneration. Also, for cyclists working on site, though low in number they do require a safe route into and off the site. We need assurance that will be provided.

**Summary**

TfL is supportive of the proposal as they will enable early delivery of the rail station and safeguard rail freight in accord with London Plan policy (Freight Policy 6.14), which is important to the future growth of London. The methodology to assess the impact of the proposals is acceptable. However, we require the following:

1. Road Safety Audit and designers' response for the modified access.
2. Air quality - Information on how this developments help reduce emissions.
3. Confirmation how this development contributes to improving pedestrian and cycle facilities along the A5 and to/form this facility for pedestrians and cyclists.

Following receipt of appropriate information related to bullets 1 to 3, TfL will be able to confirm our support for the scheme.

**Melvyn Dresner | Technical Principal Planner,  
Borough Planning (North)**

**TfL Planning, Transport for London**

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For more information on the work of the TfL Borough Planning team, including TfL's *Transport Assessment Best Practice Guidance*, *new Travel Planning Guidance* and pre-application advice please visit <http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>.

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