



## **APPENDIX 7.2**

### GLA COMMENTS AND RESPONSES



**DOCUMENT 1**

**PENTAVIA, MILL HILL**

**GLA STAGE 1 REPORT – COMMENTS AND RESPONSES**

Para	Planning Issues	Positive / Information noted	Negative / Further work	Response
<b>Background</b>				
8	PTAL	<ul style="list-style-type: none"> <li>Part of the site nearest to Bunns Lane could achieve a moderate PTAL of 3 if the proposed direct pedestrian access to Bunns Lane is provided.</li> </ul>		<ul style="list-style-type: none"> <li>The layout and design of the site access arrangements has been completely revisited to provide a significantly more direct and coherent route between the site, the A1 and Bunns Lane.</li> </ul>
11	Case History	<ul style="list-style-type: none"> <li>Broadly supportive of the previous scheme, subject to addressing concerns relating to design and impact upon townscape views.</li> </ul>		
<b>Principle of Development</b>				
16, 62	Housing	<ul style="list-style-type: none"> <li>Supportive subject to addressing access issues and concerns about the DMR rent levels.</li> </ul>		<ul style="list-style-type: none"> <li>This is addressed in the affordable housing, design and transport sections of this schedule in addition to separate addendum reports.</li> </ul>
18, 62	Retail	<ul style="list-style-type: none"> <li>Support loss of out-of-centre retail and its replacement with small scale retail floorspace.</li> </ul>	<ul style="list-style-type: none"> <li>Non-residents – should locate the retail around the central entrance square</li> <li>Enhance access to the site to serve non-residents and residents.</li> </ul>	<ul style="list-style-type: none"> <li>The revised scheme now locates the majority of the retail and community uses around the edge of the central square to create a vibrant, active ground floor.</li> <li>The layout and design of the site access arrangements has been completely revisited to provide a significantly more direct and coherent route between the site, the A1 and Bunns Lane; in addition</li> </ul>

				to improvements to bus stop locations of the 221 and 113.
20	<b>Community uses</b>		<ul style="list-style-type: none"> <li>• Social infrastructure - should consider adding further small-scale uses to the site to enhance its community offer.</li> </ul>	<ul style="list-style-type: none"> <li>• The revised scheme now includes a second D1 unit which could possibly be utilised as a doctor's surgery.</li> </ul>
<b>Housing</b>				
22, 23, 62	<b>Build to Rent affordable housing - LLR</b>		<ul style="list-style-type: none"> <li>• All of the DMR units are proposed to be let at 80% of market rent; this fails to accord with the LP.</li> <li>• Currently, do not qualify for the Fast Track route for BTR schemes, as the rent levels do not meet the requirements set out in paragraph 4.13.6 of the draft LP</li> </ul>	<ul style="list-style-type: none"> <li>• The Affordable Housing proposals (35%) have been enhanced to ensure 30% of the Affordable Housing is provided as London Living Rent. Whilst this has a significant financial impact, and the scheme is already overproviding Affordable Housing, it has been possible to partially offset this through a series of design efficiency improvements that have added 111 extra bedrooms and 7 new units.</li> <li>• The remaining 70% of the Affordable Housing will be maintained as Discounted Market Rent (DMR) to be made available with rents (including all service charges) that equate to no more than 80% of Open Market Rent (OMR).</li> </ul>
25, 26, 62	<b>Build to Rent affordable housing – Requirements as conditions and s106.</b>	<ul style="list-style-type: none"> <li>• Units must be held in a covenant for a period of 15 years – secured within the s106.</li> <li>• A Clawback mechanism must be included in the s106.</li> <li>• A management plan must be secured.</li> <li>• An early implementation review must be secured</li> <li>• A near end review mechanism must also be secured.</li> </ul>	<ul style="list-style-type: none"> <li>• Require confirmation that Meadow will retain and manage all units.</li> </ul>	<ul style="list-style-type: none"> <li>• We confirm that each block will be retained for rental and kept in single ownership.</li> </ul>

29	<b>Housing Mix – Key worker homes</b>		<ul style="list-style-type: none"> <li>• Is market rent homes for key workers a suitable means of addressing local need? Should explore converting the key worker units to DMR units.</li> </ul>	<ul style="list-style-type: none"> <li>• 100% of the Affordable Housing will be prioritised for Key Workers who already live or work in the Borough but cannot afford to buy or rent good quality housing.</li> <li>• 15% Private Rent will be prioritised to Key Workers who already live or work in the Borough.</li> </ul>
30	<b>Housing Mix – Family Housing</b>	<ul style="list-style-type: none"> <li>• The site is not considered appropriate for family housing.</li> <li>• 1 and 2 beds considered acceptable.</li> </ul>		
32	<b>Children’s play space</b>	<ul style="list-style-type: none"> <li>• Playspace should be secured by a condition</li> </ul>	<ul style="list-style-type: none"> <li>• Underproviding by 5 sqm.</li> <li>• Provide further details of the play spaces to ensure that they are ‘buffered’ from the internal road.</li> </ul>	<ul style="list-style-type: none"> <li>• As a result of the new scheme, the number of proposed children has increased from 63 to 78 which comprises a playspace policy compliant position of 780 sqm.</li> <li>• The new proposals provide 1,880 sqm of play space which is substantially over providing on this.</li> <li>• For the playspace calculation, we have used the GLA methodology in line with our previous ES report.</li> <li>• The area adjacent to the internal road is mounded and planted. This will provide a good buffer between lawn area and the road.</li> </ul>
<b>Urban Design</b>				
34, 35	<b>Layout - buildings</b>	<ul style="list-style-type: none"> <li>• The layout principles of positioning the blocks around the periphery of the site, with a central landscaped area, is supported.</li> <li>• The layout addresses the edges of the site and provides enclosure.</li> </ul>	<ul style="list-style-type: none"> <li>• Consider locating the majority of the retail and community uses around the edge of the central square to create a sense of place.</li> </ul>	<ul style="list-style-type: none"> <li>• The revised scheme now locates the majority of the retail and community uses around the edge of the central square to create a vibrant, active ground floor.</li> <li>• The relocation of these uses to the central square also promotes natural surveillance in respect to the new</li> </ul>

		<ul style="list-style-type: none"> <li>The form and massing has significantly improved from the previous scheme and addresses previous concerns regarding massing and impact on views.</li> </ul>		pedestrian entrances into the site either side of Block K.
36	<b>Layout – car parking areas; servicing road</b>	<ul style="list-style-type: none"> <li>Part-podium level for car parking is welcomed.</li> </ul>	<ul style="list-style-type: none"> <li>Inactive servicing frontage and servicing road along the M1 edge.</li> <li>Servicing road along M1 should be closed off from pedestrians/public access to ensure residents security.</li> <li>Service road should be landscaped.</li> </ul>	<ul style="list-style-type: none"> <li>New landscaping is now proposed along the servicing frontage.</li> <li>The service road is proposed to be closed off via an electric gate with fob access.</li> </ul>
38, 39, 43, 62	<b>Bunns Lane pedestrian access and route into the site from Block K</b>		<ul style="list-style-type: none"> <li>Significant concern with the pedestrian route from Bunns Lane and its entrance into the site to the rear of block K for the following reasons: <ul style="list-style-type: none"> <li>Is there sufficient space to accommodate the number of pedestrians and cyclists moving to and from the site?</li> <li>the route's legibility (e.g. can easy can it be read);</li> <li>the real and perceived safety as there is no passive surveillance onto this route.</li> </ul> </li> <li>Pedestrian entrance to the development from the rear of block K is hidden and is not differentiated architecturally.</li> <li>Entry sequence into the site towards block K must be reconsidered to ensure clear sightlines into the main public square (risks creating a gated community) – possibly achieved by pulling back the eastern edge of</li> </ul>	<ul style="list-style-type: none"> <li>The entry sequence from Bunns Lane now includes a more legible and welcoming route into the site via a landscape terrace which has a grand ramp and step connection through to an opening on either side of Block K into the central square.</li> <li>The landscape design has utilised the level changes to its advantage along the A1 to create a suitable noise buffer for the scheme but also provide an accessible route towards a relocated bus stop.</li> <li>The new terrace link from Bunns Lane will be DDA compliant and also provide a clear cycling route from Bunn's Lane along the Woodland edge and A1. The revised scheme also provides cycle link from the most northern point of the site to increase connectivity.</li> <li>The landscape changes and new pedestrian routes significantly enhance access along the perimeter road on the A1 to nearby bus stops for the scheme and to Bunn's Lane.</li> </ul>

			<p>block K to form a legible and welcoming route.</p> <ul style="list-style-type: none"> <li>• Serious concerns that the site's limited accessibility will impact quality of life for residents.</li> </ul>	
40	<b>Zone of green space between the backs of blocks and the A1</b>		<ul style="list-style-type: none"> <li>• The zone of green is at risk of being under-utilised which could cause security issues for residents.</li> <li>• Introducing direct access to cores and individual front doors to ground floor would help to activate this edge.</li> </ul>	<ul style="list-style-type: none"> <li>• The revised scheme now provides direct access to residential lobbies of Blocks K, H, F, D, M from new pedestrian routes in the green zone along the A1 and from Bunns Lane which helps to activate this space and also provide passive surveillance.</li> </ul>
41	<b>Entrance into the site from the A1 slip road</b>		<ul style="list-style-type: none"> <li>• Design of entrance into the site from the A1 slip road should be revised to extend the 'Mill Hill Walk' route to meet the pedestrian access route.</li> <li>• Reduction in the amount of surface car parking near block A should be explored to create an 'entry square' and a more pedestrian-friendly space.</li> </ul>	<ul style="list-style-type: none"> <li>• The revised scheme now includes a smaller convenience store and a new small concierge to the southern entrance of the site from the A1.</li> <li>• The design of the entrance area now provides a landscaped arrival square with shared surfaces for the occasional car access and limited surface car parking. This creates a more pedestrian-friendly space and a clearer entrance sequence to Mill Hill Walk.</li> </ul>
42	<b>Residential quality – cores and desire lines</b>	<ul style="list-style-type: none"> <li>• East/west aspect of the majority of units is welcomed.</li> </ul>	<ul style="list-style-type: none"> <li>• The legibility of each block is questioned - tucked away and unlikely to be visible for pedestrians approaching the site.</li> <li>• Should reconsider the location of the residential entrances and ensure that they are fully aligned with the desire lines running into and across the site.</li> </ul>	<ul style="list-style-type: none"> <li>• The location of the ground floor entrances have been strengthened by the new landscape routes proposed which follow the desire lines running into and across the site.</li> </ul>
43	<b>Public Realm</b>	<ul style="list-style-type: none"> <li>• Green open spaces along Mill Hill Walk is welcomed.</li> </ul>	<ul style="list-style-type: none"> <li>• Risk that the full extent of the open space across the site will not be fully utilised.</li> </ul>	<ul style="list-style-type: none"> <li>• The landscape spaces internally are divided up into a series of pocket parks suitable to serve its neighbouring blocks for residents to enjoy and a large central</li> </ul>

			<ul style="list-style-type: none"> <li>Should confirm the rationale behind sizing of the public realm and consider pulling blocks further into the site to enhance residential quality.</li> </ul>	<p>space which allows for sunlight to permeate and prevents a feeling of overlooking which often precludes the enjoyment and usability of public space.</p> <ul style="list-style-type: none"> <li>A significant landscape buffer has also been created adjacent to Watford Way.</li> <li>The landscape strategy across the scheme forms the whole focus of the development helping to define its sense of place and belonging. Its size has been established to allow for meaningful amenity in terms of physical recreation, visual and mental well-being.</li> <li>The blocks remain in situ as originally submitted to ensure that adequate separation distances remain between blocks and that there is no potential daylight, sunlight and overshadowing impacts.</li> </ul>
45, 46	<b>Density</b>		<ul style="list-style-type: none"> <li>Proposed density exceeds guidance within the LP and threshold for increased scrutiny in the draft LP.</li> <li>Addressing issues of site access arrangements is critical to its success (proposed density has not been sufficiently justified).</li> <li>A management plan must be provided.</li> </ul>	<ul style="list-style-type: none"> <li>The layout and design of the site access arrangements has been completely revisited to provide a significantly more direct and coherent route between the site, the A1 and Bunns Lane; in addition to improvements to bus stop locations of the 221 and 113.</li> <li>The Management Plan is currently being drafted.</li> </ul>
48	<b>Inclusive design</b>	<ul style="list-style-type: none"> <li>Wheelchair dwellings – number, sizes and distribution is supported.</li> <li>Should be secured by condition.</li> </ul>		
49	<b>Fire Safety</b>	<ul style="list-style-type: none"> <li>LPA should secure an informative requiring the submission of a fire statement.</li> </ul>		
<b>Energy</b>				

50, 62	<b>Energy Hierarchy</b>	<ul style="list-style-type: none"> <li>• Broadly followed the energy hierarchy.</li> <li>• Provides sufficient information to assess the 'be green' part.</li> </ul>	<ul style="list-style-type: none"> <li>• 'be lean' – should provide legible BRUKL sheets; the area weighted average for actual and national cooling demands for each non-domestic building; and further overheating analysis.</li> <li>• 'be clean' - provide legible BRUKL sheets and a drawing showing the route of the heat network linking all buildings on the site, including confirmation that all apartments and non-domestic units will be connected.</li> </ul>	<ul style="list-style-type: none"> <li>• Chapman BDSP will be providing a separate Energy and Sustainability addendum report in the formal Barnet amendment submission and will address these comments.</li> </ul>
51	<b>Carbon Emissions</b>	<ul style="list-style-type: none"> <li>• Non-domestic elements reduce carbon emissions by 36%. This exceeds the current LP targets. Should be mindful of draft London Plan which requires non-domestic to be zero-carbon by 2019.</li> <li>• Any shortfall in carbon savings should be offset through financial contributions to the Council's carbon offset funds.</li> </ul>	<ul style="list-style-type: none"> <li>• Domestic elements reduce carbon emissions by 48%. Investigate whether further reductions can be achieved to meet the zero-carbon target for residential.</li> </ul>	<ul style="list-style-type: none"> <li>• Chapman BDSP will be providing a separate Energy and Sustainability addendum report in the formal Barnet amendment submission and will address these comments.</li> </ul>
<b>Noise</b>				
52, 62	<b>Protection of residential amenity</b>	<ul style="list-style-type: none"> <li>• A number of design mitigation measures have been included.</li> <li>• Must be secured by a condition.</li> </ul>		
<b>Air Quality</b>				
53, 62	<b>Air Quality</b>	<ul style="list-style-type: none"> <li>• Scheme layout is expected to improve air quality within the central series of courtyards.</li> <li>• Air quality mitigation must be secured by condition.</li> </ul>	<ul style="list-style-type: none"> <li>• Perimeter blocks – result in localised worsening of air quality on the outside of the site.</li> <li>• When exploring alternative pedestrian access arrangements – must also have regard to limiting exposure to poor levels of air quality.</li> </ul>	<ul style="list-style-type: none"> <li>• A significant landscape buffer has also been created adjacent to Watford Way which will help limit exposure to poor levels of air quality.</li> </ul>
<b>Transport</b>				



54, 62	<b>Bunns Lane Access</b>		<ul style="list-style-type: none"> <li>• Key concern – access to and from Mill Hill via Bunns Lane.</li> <li>• Pedestrian route is convoluted and does not benefit from passive surveillance or legibility (e.g. how easy is it to read).</li> <li>• Further information required on the access into the site.</li> </ul>	<ul style="list-style-type: none"> <li>• The layout and design of this area has been completely revisited to provide a significantly more direct and coherent route between the site, the A1 and Bunns Lane.</li> <li>• The connection will be further strengthened by improvements to bus stop locations of the 221 and 113, and supplemented by signage to be detailed as part of the application submission.</li> </ul>
55	<b>Cycle Parking Provision</b>	<ul style="list-style-type: none"> <li>• Residential cycle parking accords with LP.</li> </ul>	<ul style="list-style-type: none"> <li>• Retail and commercial cycle parking not in compliance with LP (require 7 spaces for staff and 42 spaces for visitors)</li> <li>• Confirm that cycle spaces are appropriately distributed throughout the development cores and must provide details on access to the long stay spaces.</li> </ul>	<ul style="list-style-type: none"> <li>• It is recognised that allocation of the retail and commercial space now proposed has changed by comparison to that which was submitted and commented upon. However, the intention of the submitted scheme was and will continue to be to provide cycle parking in accordance with the London Plan.</li> <li>• A check has been carried out which indicates the correct level of cycle parking was previously proposed (11 staff and 36 visitor), as such we would request that the GLA confirm their application of the standards such that a revised scheme can account for this accordingly.</li> </ul>
56	<b>Car Parking Spaces</b>	<ul style="list-style-type: none"> <li>• Ratio of 0.69 per residential unit complies with the LP.</li> </ul>	<ul style="list-style-type: none"> <li>• Should explore opportunities to reduce car parking spaces.</li> </ul>	<ul style="list-style-type: none"> <li>• Whilst the applicant would be willing to reduce residential parking quantum, it is recognised that LBB are not supportive of a lower car parking provision. As such, and at this time it is not proposed to amend the residential car parking provision.</li> </ul>
57, 62	<b>Requirements to be secured by conditions</b>	<p>To be secured by a condition:</p> <ul style="list-style-type: none"> <li>• Delivery and Servicing Plan;</li> </ul>		

		<ul style="list-style-type: none"> <li>• Construction Logistics Plan;</li> <li>• Construction Traffic Management Plan.</li> <li>• Full Travel Plan</li> </ul>		
58, 62	<b>Financial Contribution</b>	<ul style="list-style-type: none"> <li>• A financial contribution of £95k per annum for 5 years (a total of £475k) to add a return journey on this route would be required.</li> <li>• Contribution must be secured within the S106 agreement.</li> </ul>	<ul style="list-style-type: none"> <li>• Route 221 would not be able to accommodate the extra passengers as a result of the proposed development during peak hours.</li> </ul>	<ul style="list-style-type: none"> <li>• The increased frequency of Route 221 is proposed to be further supplemented by a relocation / rationalisation of bus stop location. An improved location for the northbound 113 bus stop on the A1 is also proposed.</li> </ul>

# PENTAVIA, MILL HILL

## TECHNICAL NOTE: TFL SCOPING (POST CALL IN)

CLIENT: MEADOW RESIDENTIAL

DATE: DECEMBER 2018

### PURPOSE OF TECHNICAL NOTE

- i. The purpose of this Technical Note (TN) is to inform the scope of any required amendments to the Transport Assessment (TA) submitted in June 2018 relating to Pentavia Retail Park, Mill Hill. As such this TN broadly follows the structure of the TA, and indicates proposals for revisions to its contents.
- ii. This TN has been prepared following initial scoping discussions with TfL held on 5<sup>th</sup> December 2018.
- iii. For reference, the submitted TA is will be attached by way of link to the e-mail issue of this note.

### 1. INTRODUCTION

- i. With the exception of the proposed development description, and additional information relating to consultation that will be occurring post June 2018, it is not anticipated that there is any requirement to update other parts of the TA Introduction.

### 2. POLICY CONTEXT

- i. It is proposed that the Policy Context section of the TA will be updated with reference to the following:
  1. National Planning Policy Framework 2018; and
  2. The draft New London Plan (August 2018).
- ii. It should be noted that amendments to the proposed development are proposed to demonstrate its compliance with the draft New London Plan (for example cycle parking standards). However, it is noted that the draft New London Plan has not been adopted, and none of the policies tested, it therefore holds limited weight in decision making.
- iii. The draft New London Plan must be considered by a formal Examination in Public (EiP). Copies of all representations about the London Plan were submitted to the panel on 16 July 2018 along with a summary of the main issues raised. The Panel had regard to these and consulted with the Mayor before preparing a draft list of matters and participants that was published for consultation on Wednesday 12 September, not later than 12 weeks before the opening of the EiP. The Panel considered all representations about the draft list of matters and participants made within 28 days, and consulted the Mayor, before finalising the list of matters and participants. The final list was published on Tuesday 13 November 2018. The EiP will commence on Tuesday 15 January 2019.

### 3. EXISTING HIGHWAY NETWORK

- i. It is not proposed to update any content relating to the description of the existing highway network.



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### 4. EXISTING HIGHWAY NETWORK CONDITIONS

#### Parking Assessment

- i. An overnight parking beat survey was undertaken on two weekdays, Tuesday 20th and Wednesday 21st September 2016, to understand the level of existing parking demand generated by residents within the area surrounding the site. A site inventory was undertaken and single parking beat was undertaken on each night.
- ii. Full details of the survey are contained within the appended TA. However, the table below summarises capacity, occupancy and residual capacity identified in the area.

	20 <sup>th</sup> September 2016	21 <sup>st</sup> September 2016	Average
Capacity	673		
Occupancy	188	186	187
Residual Capacity	485	487	486
% Residual Capacity	72.1%	72.4%	72.2%

- iii. As discussed with TfL during the meeting held on the 5<sup>th</sup> December 2018, it is not believed that parking off-site would be of attraction to residents of the development given the sites specific context (inclusive of its own size) and access to streets where parking might reasonably be available. It is also recognised that the site will be 50% Build to Rent, and therefore a high proportion of potential residents will choose to rent elsewhere should the parking amenity not suit their needs (i.e. where parking off-site is not a realistic option).
- iv. We do not propose to undertake a further parking beat survey, and or update the information relation to Parking Assessment within the TA.

#### PERS Assessment

- v. A Pedestrian Environment Review System (PERS) audit was undertaken on Wednesday 17th August 2016 to understand pedestrian environmental conditions in the area. The following streets were included in the audit:
  3. Watling Ave/ Woodcroft Ave;
  4. Bunns Lane;
  5. Station Road;
  6. Woodland Way; and



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7. Flower Lane.
- vi. The PERS audit was extended on Tuesday 6th September 2016 to further understand pedestrian environmental conditions in the area. The following streets were included in the extension of the audit:
  8. Bunns Lane;
  9. Watford Way / Tithe Walk; and
  10. Grahame Park / Pentavia Retail Park access.
- vii. It is not proposed to update the PERS audit within the TA.

### *Personal Injury Accident Data*

- viii. Personal injury accident data for the three-year period ending February 2016 has been obtained from TfL for the roads in the vicinity of the site, and is assessed within the TA.
- ix. It is not proposed to update the personal injury accident data within the TA.

## 5. EXISTING HIGHWAY NETWORK OPERATION

### *Existing Highway Network Observations*

- i. A site walk-around was undertaken on 22<sup>nd</sup> June 2016 with Mervyn Bartlett (LBB) and Lloyd Bush (Velocity Transport Planning), to observe the existing network conditions surrounding the site.
- ii. It is not proposed to undertake a revised observation of activity and / or update this Section of the TA.

### *Traffic Surveys*

- iii. Traffic surveys were undertaken in the week commencing 16<sup>th</sup> June 2016. The surveys consisted of Manual Classified Counts (MCC), queue length surveys, and Automatic Traffic Counts (ATC).
- iv. It should be noted that the queue length surveys were undertaken on the same date as the MCC's to facilitate validation and calibration of a baseline highway capacity assessment. The ATC's recorded data for a longer period time to allow validation that the MCC and queuing data was representative of typical conditions and therefore fit for purpose.
- v. It is not proposed to update the baseline traffic flows recorded and reported within the TA, and or undertake further traffic surveys to validate the existing baseline information.



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### 6. EXISTING HIGHWAY CAPACITY ASSESSMENT

- i. It is not proposed to update either the baseline junction capacity assessment which utilised the traffic survey information described above.
- ii. It is also not proposed to update the baseline footway capacity assessment (Pedestrian Comfort Level (PCL)).
- iii. It is proposed to include for a baseline Healthy Streets Assessment for the section of Bunns Lane between its underpass with the A1 and its junction with Flower Lane. This will enable a comparison to be made to proposed development scenario within the impact assessment section of the TA.

### 7. EXISTING SITE ACCESSIBILITY

- i. No updates are proposed to be undertaken to the Existing Site Accessibility Section of the TA.

### 8. EXISTING SITE OPERATION

#### *Existing Site Use*

- i. It is not proposed to update the description of the existing site, this remains valid.

#### *Extant Use Trip Generation*

- ii. In order to calculate the likely number of vehicle trips that could be generated by the site if it were fully occupied, the TRICS and TRAVL databases were interrogated for comparable sites. The sites that have been selected for the combined assessment of non-food retail (Retail Park) and restaurant use were agreed with LBB.
- iii. As discussed at the meeting with TfL on the 5<sup>th</sup> December 2018, a number of the comparable sites which LBB requested be used recorded surveys some years ago. The two tables overleaf summarise the sites and resultant extant use trip rates applied in the TA.



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Extant Restaurant (664sqm)					
Site No	Site Ref	Survey Date	Location	PTAL	GFA
1	257	04/06/1999	Merton	3	150
2	1048	28/02/2012	Richmond Upon Thames	3	120
3	BN-06-C-01	25/06/2014	Barnet	2	274
4	HD-06-C-01	07/01/2016	Ruislip	1b	850
Extant Retail Park (9,053sqm)					
Site No	Site Ref	Survey Date	Location	PTAL	GFA
1	266	10/12/1999	Waltham Forest	1	8990

Restaurant						
Peak Periods	Arrivals	Departures	Total	Arrivals	Departures	Total
	Trip Rate			Trip Generation		
Morning Peak (08:00-09:00)	0.000	0.118	0.118	0	1	1
Evening Peak (17:00-18:00)	2.400	1.089	3.489	16	7	23
Retail Park						
Peak Periods	Arrivals	Departures	Total	Arrivals	Departures	Total
	Trip Rate			Trip Generation		
Morning Peak (08:00-09:00)	0.534	0.133	0.667	48	12	60
Evening Peak (17:00-18:00)	0.601	0.690	1.290	54	62	116



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- iv. The trip rates applied to the extant use of the site were discussed at the meeting with TfL 5<sup>th</sup> December 2018, and it is understood that there will be no requirement to update or amend these or this section of the TA.

### 9. FUTURE HIGHWAY CAPACITY ASSESSMENT

#### Assessment Years

- i. The most recent submission of the TA stated:

*“Construction of the proposed development is estimated to complete and the full occupation of the site be available in 2022. It is noted that it was originally anticipated that occupation of the site could take place from 2021, and it has been agreed with LBB that this TA would assess two future year scenarios; the Opening Year 2021 and Future Year 2026 (five years post construction). On the basis that the assessment considers a Future Year of 2026 it has not been deemed necessary to amend the opening year assessment”*

- ii. On the basis of the above, it is proposed to maintain the same method of assessment; inclusive of Opening Year 2021 and Future Year 2026.

#### Future Base Traffic

- iii. No changes are proposed to the growth rates applied within the TA for Opening and Future Years.
- iv. It is proposed that any new committed development that has been permitted since the original submission of the TA will be reviewed. Where applicable the traffic flows generated by any new committed development will be summarised within this section of the TA.

#### Future Baseline Traffic Assignment

- v. No changes are proposed to the assignment of future baseline traffic, albeit it is recognised the quantum of traffic assigned may differ should new committed development traffic flows be identified.

#### Future Baseline Capacity Assessment

- vi. Updates to the junction capacity assessments for the future baseline scenarios will only occur should additional new committed development traffic be identified.

### 10. PROPOSED DEVELOPMENT

- i. It is proposed to update this section of the TA with updates to the development schedule and description of residential accommodation.





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- ii. As discussed at the meeting held with TfL on 5<sup>th</sup> December 2018, it is proposed to increase the number of residential units from 724 to 843 (approx. the scheme is still subject to design development but has been assumed to achieve 843 for the purposes of this TN). It is proposed that some of the units will remain as Build to Rent, with others offered for sale.
- iii. The revised unit types both in terms of tenure and mix will be fully described within the update to the TA. For context, the proposed unit sizes for the amended scheme at the current time are given in the table below.

Unit Type	No. Units
1 bed (2 person)	284
2 bed (3 person)	92
2 bed (4 person)	332
3 bed (5 person)	23
3 bed (6 person)	112
<b>Total</b>	<b>843</b>

- iv. It is not proposed to amend any of the other uses proposed on-site.

### 11. DEVELOPMENT ACCESS STRATEGY

- i. It is not proposed to update or amend the Development Access Strategy Section of the TA. No material changes to description of the strategy within this Section are proposed.

### 12. DEVELOPMENT PARKING STRATEGY

- i. Proposed changes to parking were discussed at the meeting with TfL 5<sup>th</sup> December 2018. It is proposed to lower the provision of residential car parking from a total of 545 spaces to a total of 366 spaces.
- ii. In accordance with the draft New London Plan, it will now be proposed that all 20% of all car parking spaces will have active charging facilities, with all remaining now proposed to have passive provision.
- iii. In accordance with the draft New London Plan, it will now be proposed that 3% of parking spaces will initially be allocated for disabled users. A further 7% will remain as oversized parking spaces such that they can be converted to disabled parking should demand require.



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- iv. To support the reduction in car parking spaces proposed, a further method of management will be added to the Car Park Management Plan (CPMP) which will enable unused disabled parking to be leased to non-disabled residents should demand require / permit. However, a minimum residual capacity of three disabled parking spaces must always be maintained and non-disabled residents re-allocated standard parking spaces when they become available.
- v. As discussed with TfL at the meeting 5<sup>th</sup> December 2018, it is proposed that visitor car parking will be reduced from 41 to 10 car parking spaces. The remaining spaces will be future proofed for expansion of resident parking should demand require. The potential increase would provide a total of 397 resident car parking spaces (approx.).
- vi. A review will be undertaken of the information previously provided within the TA in regard of Census 2011 car ownership data. Where applicable the information may be amended, updated or omitted. It is recognised that whilst useful, the car ownership information is from 2011 and only really indicates historic ownership trends without reflecting upon current and future trends.
- vii. It is proposed to revise the cycle parking provision proposed across the site in accordance with the draft New London Plan policy. Space required to facilitate the additional cycle parking will be found in the reduction of car parking.
- viii. This Section of the TA will be updated to reflect the changes described above.

### 13. DEVELOPMENT TRIP GENERATION

#### *Residential Use – Vehicle Trips*

- i. As discussed in the meeting with TfL 5<sup>th</sup> December 2018, there is a potential disconnect between the impact of the proposed reduction in car parking and the trips that could be generated based on the methodology within the TA.
- ii. Trip rates extracted from the TRICS database have been applied on a per unit basis. Application the same per unit trip rate to an increased quantum of units as proposed will indicate a higher number of vehicle trips occurring despite the proposed reduction in car parking (approx. 180 spaces).
- iii. In order to ensure that the proposed amendments to the scheme are reasonably reflected within the trip generation assessment and assessment of air and noise etc, some preliminary sensitivity testing has been undertaken to determine an appropriate approach. This includes a review of all previously used / agreed trip rates throughout the development of the scheme in the planning process.
- iv. The table overleaf summarises historic trip rate information and resultant vehicle movements presented at those times.



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- v. In September 2016 trip rates based on comparable sites were agreed with LBB. In January 2017, the sites agreed with LBB were further supplemented with additional sites via agreement with TfL. In November 2017, the comparable sites and resultant trip rates were fully revised to meet TfL Guidance. The sites and trip rates agreed in November 2017 remained applicable in the June 2018 planning submission.

Date	Proposed Development			Ratio	Applied Trip Rates			Predicted Movements		
	Units	Parking Spaces	Ratio		AM	PM	Daily	AM	PM	Daily
Sep 2016	695	479	0.69	0.96	0.274	0.264	2.940	190	183	2043
Jan 2017	685	343	0.50	0.63	0.183	0.211	2.365	125	145	1620
Nov 2017	717	500	0.70	0.65	0.164	0.231	1.679	118	166	1204
Jun 2018	724	545	0.75	0.65	0.164	0.231	1.680	119	167	1216

- vi. Four methods have been considered in regard of updating the TA based on the new proposal. These are described below:
1. Application of the January 2017 trip rates (on the basis these were applied to a proposal with 0.5 spaces per unit);
  2. Application of new trip rates extracted from the TRICS database for flats (note these are categorised as privately owned flats) within Greater London in the past 3 years, and within PTAL 2/3. This indicated three sites:
    - a. BT-03-C-01 / 01 – Park Royal (Discounted due to parking ratio of 0.8 spaces per unit);
    - b. HO-03-C-04 – Hounslow (0.7 spaces per dwelling); and
    - c. HV-03-C-02 / 01 – Romford (0.5 spaces per dwelling).
  3. Application of trip rates from TRICS site HV-03-C-02/01 only; and
  4. Application of a proportional decrease in trip rate in accordance with the proportional decrease in car parking i.e. based on the June 2018 per unit trip rates there is a per parking space trip rate inherent within the information which can be used.
- vii. The table below shows the resultant trips based on each of the above scenarios.



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Scenario	Proposed Development			Ratio	Applied Trip Rates			Predicted Movements		
	Units	Parking Spaces	Ratio		AM	PM	Daily	AM	PM	Daily
1	843	366	0.43	0.63	0.183	0.211	2.365	154	178	1994
2				0.60	0.128	0.195	1.734	108	164	1462
3				0.5	0.127	0.149	1.352	107	126	1140
4				0.43	0.095	0.133	0.969	80	112	817

- viii. The above demonstrates that reverting to the trip rates previously used when proposing a parking ratio of 0.5 spaces per unit will indicate a higher level of vehicle trips than the current TA.
- ix. The first run of a new assessment, looking for London flats with PTAL 2/3 within the past 3 years identified two sites of parking ratio 0.5 and 0.7. The daily trip rate is also greater than that within the current TA, and will therefore indicate more vehicle trips.
- x. Using the single site which had a parking ratio of 0.5 spaces per unit does result in some reduction in daily vehicle trips. However, the method which demonstrates a reduction in vehicle trips which would be considered appropriate given the loss of approx. 179 parking spaces is the application of a proportional reduction to the previous trip rates in respect of the reduction in parking (i.e.  $(0.43/0.75) \times \text{previous trip rate}$ ).
- xi. It is therefore proposed to update this Section of the TA on the basis of scenario 4 described above.

### *Non-Residential Use – Vehicle Trips*

- xii. As discussed at the meeting with TfL on the 5<sup>th</sup> December 2018, a number of the comparable sites which LBB requested be used recorded surveys some years ago.
- xiii. The trip rates applied to the proposed non-residential uses were discussed at the meeting with TfL 5<sup>th</sup> December 2018, and it is understood that there will be no requirement to update or amend these or this section of the TA.

### *Identification of New Network Trips*

- xiv. It is not proposed to amend the methodology adopted within the TA to identify new vehicle trips to the network. It is anticipated that changes to the total development new vehicle trips may result from adjustments made to the residential vehicle trip generation as described within this TN.

### *Multi-Modal Trip Generation*

- xv. The multi-modal trip generation assessment is proposed to be updated by application of the trip rates within the TA to the new number of residential units.



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### 14. DEVELOPMENT TRIP ASSIGNMENT

- xvi. It is proposed that this Section of the TA will be updated based on any revision to trip numbers. The methodology of assignment will remain as presented within the TA.

### 15. DEVELOPMENT HIGHWAY CAPACITY

#### *Junction Capacity Assessment*

- xvii. As discussed with TfL 5<sup>th</sup> December 2018, the proposed reduction in car parking will result in a reduction of vehicle trips by comparison to the junction capacity assessment undertaken within the TA. It is therefore not proposed to amend the information within the TA given that it assess a worse case than expected.

#### *Footway Capacity Assessment*

- xviii. It is proposed to update the footway capacity assessment subject to changes in trip generation and assignment.

### 16. JUNCTION IMPACT ASSESSMENT

- i. On the basis that the junction capacity assessment is not proposed to be update (given it is robust in assessing a higher number of vehicle trips than anticipated), the junction impact assessment will remain as current within the TA, with references added in regard of the assessment being robust.

### 17. SITE ACCESSIBILITY IMPACT ASSESSMENT

- i. Where applicable it is proposed that this Section of the TA will be updated based on the revised trip generation.
- ii. It is proposed to include a Healthy Streets Assessment for the section of Bunns Lane between its underpass with the A1 and its junction with Flower Lane following the implementation of the proposed development. This will enable a comparison to be made to baseline scenario.
- iii. Discrete Healthy Streets Assessments will be made for various areas of the site (i.e. adjacent A1, southern entrance etc) and included within this Section of the TA.



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### 18. PARKING IMPACT ASSESSMENT

- i. Minor amendments are proposed to update this Section of the TA in regard of parking numbers. However, it is not anticipated that significant update will be required.

### MITIGATION STRATEGY

- i. It is not proposed to update the mitigation section within the TA.



## Lloyd Bush

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**From:** Dresner Melvyn (ST) <Melvyn.Dresner@tfl.gov.uk>  
**Sent:** 04 January 2019 14:53  
**To:** Lloyd Bush  
**Cc:** 'neil.wells@quod.com'; 'lgoldberg@meadowres.com'; Andrew.Russell@london.gov.uk  
**Subject:** RE: Pentavia - Mill Hill

Hi Lloyd,

My comments:

### General observations

Will you be issuing a new TA or addendum to the existing document?

### Policy Context

Also reference MTS and Action Plans.

### Existing Highway Network conditions

TfL suggested a Healthy Streets Designers Check for Bunns Lane Frontage (base and future), which you accept.

For other pedestrian and cycle routes a broader check against Healthy Streets indicators would be sufficient.

### Future highway capacity assessment

TfL hasn't suggested modelling needs updating. However, you need to review with local highway authority any changes related to committed development and decide if mode updates are necessary.

### Development parking strategy

TfL welcomes the emerging approach to parking. You need to provide evidence to counter local concerns about lower parking.

### Development trip generation

Updating trip generation taking account lower parking ratios is reasonable. The methodology is accepted by TfL.

### Mitigation Strategy

As planning authority, the Mayor will need to consider local representations and objections. I would like to make sure the mitigation strategy covers any transport concerns they raise.

It would be helpful to see draft conditions/ s106 obligations related to these aspects.

**Melvyn Dresner | Technical Principal Planner,  
Spatial Planning (North), City Planning  
Transport for London (TfL)**

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