

### INTRODUCTION

1. The purpose of this Technical Note (TN) is to respond to comments raised by Barnet Cycle Campaign (BCC) in respect of the proposed redevelopment of Pentavia Retail Park.
2. It is noted that this note seeks to respond to both comments made in regard of planning application 17/8102/FUL submitted on the 26 January 2018, and subsequent comments made following amendments to the proposed development.
3. In advance of specific responses made within this TN, it is pertinent to highlight that the National Planning Policy Framework (NPPF) states:

*“Planning obligations must only be sought where they meet all of the following tests:*

*(a) necessary to make the development acceptable in planning terms;*

*(b) directly related to the development; and*

*(c) fairly and reasonably related in scale and kind to the development.”*

4. As such, any commitments or contributions towards improvements to off-site cycle infrastructure need to be considered in the context whether they are required in planning terms, directly related to the development, and fairly and reasonable in scale and kind to the development’s specific impacts.
5. It is therefore important to consider the context of the developments demand for increased cycling within the wider area, and it’s own context when compared against other competing sustainable modes (i.e. walking and public transport).
6. The submitted Transport Assessment (TA) including a trip generation exercise that has been scoped and agreed with TfL that identifies the developments main mode trips. It identifies that only 3% of daily trips made are anticipated to be by cycling, whereas 33% of trips are made on-foot, and a further 32% by public transport modes who will also generate movements on-foot in order to access the services.
7. It is therefore appropriate to consider the appropriateness of off-site cycle infrastructure in the context of its balance and potential impacts to other more prevalent sustainable trips in order that any planning obligations can be demonstrated to meet the NPPF tests.



### 1. RESPONDING TO THE PLANNING BRIEF

1. As part of BCC's comments, reference is made to the to specific sections of the site planning brief which BCC have stated provides context for their objections. The following paragraphs summarise the relevant sentences of the planning brief and how the proposed development responds to these.

*"1.2 The objectives for the site are: improvements to existing transport infrastructure and creation of new pedestrian and cycle links to Mill Hill Town Centre, Colindale, Mill Hill Park, Copthall and local transport nodes"*

2. The proposal meets the objective of creating new cycle links between the A1 and Bunns Lane which currently do not exist. The proposal also allows for varied route choice and route choice characteristics in order to make the new connection, which widens the appeal of the cycling connection to a wider cohort of cyclists with varying degrees of experience and confidence.
3. Mill Hill Town Centre – New connections made to Bunns Lane (which currently do not exist other than via a very steep narrow / unsuitable connection on the north side of Bunns Lane), which facilitates the opening up of access to the Town Centre via Flower Lane.
4. Colindale – New 3.0m wide cycle connection to Bunns Lane adjacent the M1 / Rail Bridge facilitates access to the northern end of Grahame Park Way and associated cycle lane. This is a new and direct (as direct as possible given the site is bound by the M1 and Rail lines to the west) access towards Colindale. Direct access to the ramps associated with the M1 bridge at the southern end of the site can also be gained by cyclists via the new proposed path which would otherwise require circulation around the east side of the BP Petrol Station (and associated crossing movements with the on & off slip roads). This connects to Grahame Park Way via the rail underpass which is subject to improvements as identified as part of the proposals.
5. Mill Hill Park – As with Mill Hill Town Centre, the new cycle connections facilitate access to Flower Lane & Mill Hill Park by creation of a new cycle link between the Site / A1 and Bunns Lane.
6. Copthall – connection to Bunns Lane as described above. It is further noted that the developer has committed to make a meaningful contribution to an improvement scheme at the Bunns Lane / Page Street junction (currently configured as double min-roundabouts), and it is recommended that pedestrian and cyclists be at the forefront of any emerging changes to the junction.
7. Local Transport Nodes – new connections to Mill Hill Broadway Station created across the site as described above. Connections to Grahame Park way as described above facilitate improved connections to Colindale Station.



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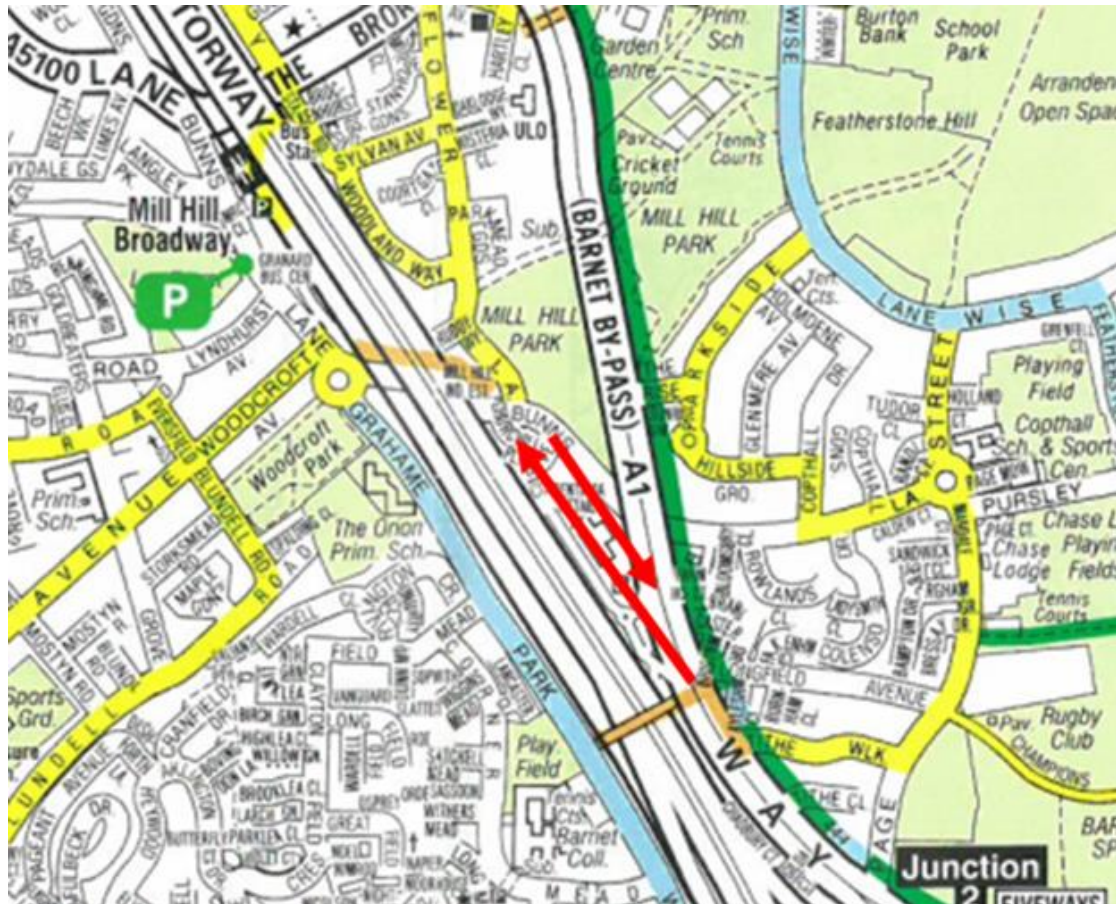
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8. At a high level view the proposed development can be seen to be creating a connection between existing cyclable routes that otherwise does not exist, stitching together two otherwise quite separate cyclable areas. This is illustrated in **Figure 1**.

**Figure 1: Creating New Cycle Links**



*“1.3 In order to deliver these objectives, the sustainable redevelopment of the Pentavia site presents a number of opportunities. These include: new pedestrian and cycle links that contribute to the re-integration of the site with Colindale and Mill Hill.”*

9. As described above, the proposed development proposes to significantly contribute to the re-integration of the site to the wider by establishing a number of varied routes and connections across the site and to Bunns Lane that currently do not exist. Further contributions are committed to being made to improve both the underpass of the A1 and M1 / railway on Bunns Lane, and the underpass to the south of the site linking to Grahame Park Way.



*“5.12 Due to the low PTAL rating combined with difficult pedestrian and cycling linkages any future development will need to both improve these access routes” with reference to Mill Hill Broadway and Grahame Park Way*

10. Improvements made towards connections to Mill Hill Broadway and Colindale have already been responded to above. It is noted that access to Bus routes 221 and 113 are proposed to be improved by bus stop relocations, as well as contributions to improve the services frequency of bus route 221.
11. The proposals to improve connectivity to public transport services has increased the sites PTAL from predominantly PTAL 1b, to a score of 3 in the northern area closest to Bunns Lane and predominantly 2 across the site. There is also no longer any part of the site that scores PTAL 1a.

*“6.6 The introduction of residential land uses would be subject to demonstrating the ability to provide suitable accessibility for future residents through the creation of new and improved vehicular and transport connections, alongside improvements to cycling and pedestrian access and choice”*

12. The site is bound by the M1 Motorway, Bunns Lane, and the A1 from which vehicle access and egress is undertaken. The possibility of providing a secondary access and egress (or only one of the aforementioned) was explored through consultation with LBB and local residents, and was met with significant resistance. Given no other additional access and egress options for vehicles exist, it is proposed to be maintained via the A1 only. Given the quantity of vehicle traffic expected to be generated by the proposed residential use in the context of the existing sites permitted use (a daily net reduction) and current traffic flows on the A1 it was considered inappropriate to consider a more significant design intervention on the A1 (i.e. new all-movement signalised junction).

*“7.15 A full Transport Assessment (TA) will therefore be required to examine the impact of the proposed development and how such impacts will be mitigated. It will therefore need to include a detailed assessment of any new link road/s. The impact of the development on the local road network, as assessed in the TA, should include, and not be restricted to the following junctions:*

- i. A41 / Page Street / Hall Lane / A1 / A41 Great North Way (Fiveways Corner);*
- ii. A1 / A41 / The Broadway (Mill Hill Circus);*
- iii. Bunns Lane / Grahame Park Way;*
- iv. Page Street / Pursley Road / Bunns Lane;*
- v. Both ends of Flower Lane; and*
- vi. Bunns Lane / Hale Lane / The Broadway.”*

13. All the aforementioned junctions are assessed as part of the TA.



### 2. OBJECTIONS

*"The Site Plan shows paths that appear to be too narrow. Such paths should be at least 2.5m if shared, and preferably 3m and segregated"*

1. The design team has taken onboard the comment raised by BCC, and has reviewed the cycle routes and opportunities to improve and vary the cycle experience across the site further.
2. There remains a route through the central part of the site from north to south which is in excess of 3m wide. The route is treated as a shared space with vehicle activity in the central area limited to servicing and emergency vehicles. It is anticipated that this may be used by less experienced cyclists and /or those who are not looking to make expedient headway and instead enjoy the activity of the development / commercial uses on route.
3. Plans have now been amended to widen the existing shared cycle footpath on the A1 adjacent the site, with the developer offering up land for adoption by TfL in order to facilitate the works. This will increase the width to 2.5m.
4. The widened footpath on the A1 connects to the proposed ramp to Bunns Lane. The design of which has been reviewed to increase the width of the ramp to 2.5m.
5. A new proposed shared route has also been added to the plans. It runs from north to south immediately adjacent the M1 and the proposed developments access road. This route is generally flatter, with less changes in vertical alignment by comparison to the other routes available. It is also the shortest route should cyclists from north to south, and is likely to be more appealing for cyclists who are keen to make headway.
6. **Figure 2** below indicates the cycle connections that can be made across the sites, identifying three route choices.

**Figure 2: Site wide cycle connections**





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*“Cars use a 2-way street along the west side, which provides 3 entrances to underground car parking. The cycle parking is also underground, and it is not clear from the plans submitted that cyclists have separate access. BCC objects to any development proposal that does not segregate bicycles and cars at the entrances and exits to the underground parking.”*

*“It is unclear from the plans whether there are steep gradients expected to enter or exit the underground parking. BCC objects to any access to the underground parking that prevents disabled and elderly cyclists from using their bicycles. This includes lack of provision of step free access to the surface.”*

7. The access points to the car park are of sufficient width to allow the safe interaction of cycles and vehicles and or the inclusion of demarcation of a separate cycle entrance. The widths vary from 6.5m to 7.2m, with level access afforded on the most southerly ramp (which can be accessed from all cycle storage locations). The steepest ramp is at the most northerly access and is 1:13 for a distance of 6m.

*“The Travel Assessment (TA) requested in paragraph 7.15 of the planning brief has been provided as an accompanying document set to the Environmental Statement (ES), dated 30/11/2017. Both the ES and TA were performed against the MTS as set out in 2010. This strategy is currently being superseded by a new one, which was published in draft form in June 2017.*

*The new strategy places liveable neighbourhoods at the heart of any development and consequently would result in significant changes to the cycling and walking priorities of Pentavia Park. We recommend that the entire site is assessed against the Mayor’s Healthy Streets criteria, which outline 10 points to achieve better liveable neighbourhoods.*

*Given the proximity of this application to the new strategy being approved, we believe it would be prudent to revisit the TA under the context of the new strategy.”*

8. The comment relates to previous material produced. The scope of the revised TA and supplementary assessments has been discussed and agreed with TfL. As part of this process a Healthy Streets Check against indicators has been undertaken for both on-site proposals and at the Bunns Lane site frontage. An Active Travel Zone (ATZ) assessment has also been undertaken by request from TfL, and subsequent to their release of new guidance on this assessment in February 2019.

*“Given the explicit aims of the planning brief to improve cycling links, we believe that the inclusion of cycling within car figures (paragraph 7.7.10 of the TA) is not prudent. We also believe that the claim made in paragraph 7.7.34 accepts the low safety level for cyclists and is evidence of a failure to adhere to the planning brief. This is critical when it is noted that 34.4% of car trips are under 5km (paragraph 14.2.4 of the TA), which could be made by bicycle in less than 20 minutes.”*

9. It is unclear what information is referred to, as having checked back in previous reports paragraph numbers referenced do not exist. All trip generation information within multi-modal assessments include cycling as a separate mode in both old and new documents.



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*“We acknowledge that there is now cycle access to Bunns Lane, and hence point 3 of our original response is no longer pertinent.*

*However, we note that the new proposed path will place cyclists at the western end of Bunns Lane, which presents problems for cyclists wishing to go east on the road. This would mean cyclists having to cross the road to take the outlined route. There is no crossing west of the Flower Lane Junction, and one should be included near where cyclists would egress, preferably Toucan. Without this crossing, we object to the new proposals”*

10. The primary function of the cycle link further west was to provide access to Bunns Lanes with the onward journey in that direction (i.e. continuing on Bunns Lane, access to Grahame Park Way etc), whereas those wishing to access Flower Lane for Mill Hill Broadway would seek to use the new link adjacent the main pedestrian access to Bunns Lane. Both encourage left turn movements and therefore would not require a crossing to cater for the predominant demand. This was considered preferential given the significant resident and officer concerns about the operation / congestion on Bunns Lane when discussing the scheme.
11. As identified within the introduction of this TN, it is important to consider whether the request for a Toucan crossing facility would meet the three tests of planning obligations defined by NPPF. It is considered that it would fail in regard of all three tests.
12. Notwithstanding the above, it has been agreed with TfL that it would be appropriate for improvements to be made in the vicinity of the M1 / Rail bridge on Bunns Lane, particularly in regard of improving the route through the underpass for pedestrians and cyclists. It has been agreed that the development will make a final contribution towards works (to be investigated / designed in conjunction with LBB) to improve this section of highway. The details relating to this contribution will be secured via a Section 106 Agreement.



*"We note that, under the London Cycling Design Standards (LCDS), a CLoS is not required at various stages, however it is recommended to be performed against the existing and planned layouts. The CLoS undertaken by the authors of the 2016 application's TA (Robert West) was against the current layout only, and we recommend that a CLoS is performed against the plans."*

13. Further to discussions with TfL, the CLoS assessment has not been updated, but has been replaced by an assessment of the site based on the Healthy Streets Checklist.

*"We also note that the LCDS recommends the involvement of stakeholders in assessing cycling infrastructure "at a meaningful time". BCC (and by affiliation LCC) would be considered such a stakeholder, and we note the lack of consultation by the developers during the design phases."*

14. It is regrettable that BCC feel they have not had the opportunity to contribute to the design development of the scheme from a cycle infrastructure perspective, however, significant public engagement has been undertaken in relation to this development that have offered the opportunity for BCC to engage with the design team should they have deemed it of significant importance. Specific consultations and meetings have been held with various interested local interest groups where they have expressed a desire to engage. Regardless, we are hopeful that the response and design changes made as part of reviewing BCC's comments will help in addressing the objections raised.

*"Bunns Lane would benefit from a 1.5m segregated cycle track as it is currently heavily laden with traffic and pedestrians during rush hour times. This could reasonably be achieved without removing excessive pavement space and would improve the walking environment by preventing cars from parking on the pavement."*

15. Given the significant resistance by LBB and local residents for alterations to Bunns Lane that might further increase congestion, any such interventions have not been considered. We would again refer back to the level of cycling expected to be generated by comparison to those on-foot or utilising the 221 bus service who would likely be negatively impacted. Such intervention would not justifiably be balanced in the context of other sustainable transport demands and would not meet the tests of the NPPF for planning obligations.

*"The plans make no significant alterations to the current method of entering or exiting the site beyond the single new shared path. Entry and exit will be achieved by using the slip roads to the A41/A1 to the south of the site. "*

16. The proposal includes a new route to the west of the existing BP petrol station which facilitate entry and exit movements to the south which do not require any crossing of the slip roads.

*"In order to exit the site and travel south by bicycle, a person will be forced to dismount, reverse the direction and cross both slip roads. The alternative is to proceed to Mill Hill Circus and return on the south bound side."*





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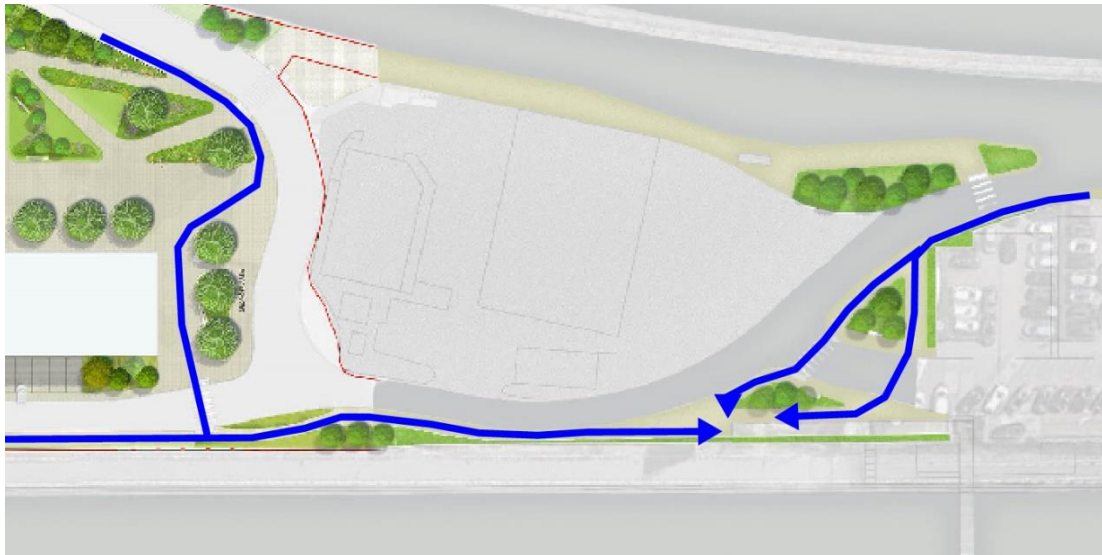
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17. As previously stated, cyclists wishing to exit the site to the south can do so without the requirement to cross either the entry or exit slip road due to the provision of a new shared route to the west of the BP petrol filling station.

*“Exiting and entering the site towards Grahame Park Way means crossing a bridge. No provision in the plans has been made for access to this bridge from the slip roads. Riders are presented with either crossing the slip road near a blind bend or exiting the entire site to the north and returning, crossing both slip roads. Additionally, access to the bridge is via the trade entrance to a car dealership.”*

18. In conjunction with the provision of the new shared route to the west of the BP petrol filling station, the revised plans have sought to improve the access arrangements at the base of the ramp. **Figure 3** indicates the proposed connections achievable by cycle.

**Figure 3: Cycle connection to the south**



*“We welcome the new proposal for funding changes to the tunnel under the train line. We would like to see it go further and be ring fenced solely for this purpose.”*

19. Funding for the proposed improvements to Grahame Park Way underpass will be secured for the specific purpose within the Section 106 Agreement.