

B&Q Broadway Retail Park, Cricklewood Lane,  
Cricklewood, NW2 1ES

## **PROOF OF EVIDENCE (TRANSPORT)**

by Richard Fitter, IEng, FCILT, FICE, FIHE

**APP/3/A**

Planning application Ref: 20/3564/OUT

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## SUMMARY

- i. My evidence considers the effect of the Proposed Development on local transport, with particular regard to sustainable travel, effects on the road network and highway safety, and the amount of parking to be provided.
- ii. The Application is in outline only with all matters reserved except for access. The matters of layout and landscaping would therefore be determined as part of any reserved matters or full planning applications.
- iii. The Application Site is very well placed to promote sustainable travel choices. The Application Site has a current PTAL rating of 5 at the front of the site and 4 at the rear; however, the Proposed Development will introduce new direct pedestrian and cycle routes through the site, thereby reducing the distance to the bus stops on Cricklewood Lane and to Cricklewood Station. This will have the effect of increasing the access level at the rear of the Application Site. An audit of existing sustainable transport infrastructure shows that the Application Site is very well located to promote walking and cycling as the preferred modes of travel for shorter journeys.
- iv. The Application was supported by a Transport Assessment and a three-part Transport Implementation Strategy. Following consultation responses from The Council's Transport Team and TfL, a revised Transport Assessment was submitted in March 2021 including an Active Travel Assessment; and a further Traffic Impact Assessment (TN5) was submitted in May 2021.
- v. On the basis of the information submitted in support of the Application, The Council as local highway authority raised no objection to the Proposed Development subject to conditions and obligations. The Council did, however, provide the following putative reason for refusal on 8th November 2022:

***"Members direct officers that they would have been minded to refuse the application and that officers should give evidence to the Planning Inquiry resisting the scheme, due to the fact that the proposed development and parameters sought, by virtue of an excess in height, scale and massing would result in a discordant and visually obtrusive development that would demonstrably fail to respect the local context, to the detriment of the character of the area, and the setting of the adjacent Railway Terrace Conservation Area, and would therefore not constitute a sustainable development and would be contrary to the Local Plan."***



- vi. The reference to sustainable development appears to relate exclusively to the scale of buildings and local context, character of the area and Conservation area; however, my evidence addresses any allegation that the Proposed Development would not constitute sustainable development in terms of means of access and transportation.
- vii. TfL as strategic transport authority raised no objection to the Proposed Development subject to conditions and obligations. LB Camden and LB Brent as neighbouring highway authorities raised no objections on transport grounds.
- viii. I have demonstrated that the Proposed Development would result in a significant net reduction in vehicle trips compared to the existing retail use and would therefore have a positive effect on local highway conditions.
- ix. I have demonstrated that the Proposed Development would deliver an appropriate level of car parking in line with the London Plan 2021, and that the proposed level of parking would both meet the needs of the development and cause no harm to the surrounding highway network.
- x. The Proposed Development would deliver a package of transport improvements. The improvements would comprise management procedures to control and regulate the movement of people and goods to and from the site, contributions and obligations to enhance the surrounding transport network and to promote sustainable transport choices, and physical measures to improve the local highway conditions.
- xi. In accordance with the terms of the National Planning Policy Framework, the Application should not be refused on highways or transport grounds. The Proposed Development would accord with the development plan and there are no material transport considerations which outweigh the presumption in favour of granting planning permission.



## 1.0 PERSONAL QUALIFICATIONS AND SCOPE OF EVIDENCE

### 1.1 Personal Qualifications

- 1.1.1 My name is Richard Fitter. I am an Incorporated Engineer, registered with the Engineering Council. I am a Chartered Fellow of the Institution of Logistics and Transportation, a Fellow of the Institution of Civil Engineers and a Fellow of the Institute of Highway Engineers.
- 1.1.2 I was co-opted as a Member of the Council of the Institute of Highway Engineers and chaired their national debate on competing requirements of the Manual for Streets and the Design Manual for Roads and Bridges.
- 1.1.3 I am a Director of Entran Ltd and have 34 years' experience in traffic engineering and transport planning in both the public and private sectors. I have extensive experience of assessing the transport implications of a range of developments including mixed-use and residential developments across London and throughout the UK.
- 1.1.4 Entran were appointed by Montreaux Cricklewood Developments Ltd (the "Applicant") in February 2019 to provide transport consultancy services in support of the outline planning application with reference 20/3564/OUT (the "Application") for the redevelopment of land at B&Q Broadway Retail Park, Cricklewood, Lane Barnet NW2 1ES (the "Application Site"). I was the project Director for Entran throughout the pre-application and planning application process.
- 1.1.5 I have visited the Application Site on a number of occasions, and I am familiar with its layout as well as the surrounding transport network.
- 1.1.6 I have prepared this proof of evidence in accordance with the guidance of my professional institutions, and I confirm that the opinions expressed are my true and professional opinions.
- 1.1.7 In preparing this proof of evidence I have adhered to the RTPI Code of Conduct and prepared evidence consistent with the rules and guidance to Part 35 of the Civil Procedure Rules and which govern the work of expert witnesses. The required affirmation concluding this evidence sets out my understanding of those duties. This includes confirmation that I am not paid under any contingency or success fee arrangements.



## 1.2 Scope of Evidence

1.2.1 I have been instructed by Montreaux Cricklewood Developments Ltd to provide this proof of evidence in response to the Secretary of State's decision to call in the Application for the redevelopment of land at B&Q Broadway Retail Park, Cricklewood, Lane Barnet NW2 1ES.

1.2.2 The current use of the Application Site is retail (Use Class E). The Application is for outline planning permission (including means of access with all other matters reserved) for the demolition of existing buildings and the comprehensive phased redevelopment of the Application Site for a mix of uses including up to 1049 residential units (Use Class C3), and up to 1,200 sqm of flexible commercial and community floorspace (Use Classes A3/B1/D1 and D2) in buildings ranging from 3 to 18 storeys along with car and cycle parking, landscaping and associated works (the "Proposed Development").

1.2.3 Transport was not one of the issues cited in the call-in letter (CDC.02) which stated as follows:

***"On the information so far available to the Secretary of State, the matters which he particularly wishes to be informed about for the purposes of his consideration of the application are the design, scale and massing of the proposal and any other matters the Inspector considers relevant."***

1.2.4 However, following the Case Management Conference on 30<sup>th</sup> November 2022, the Inspector issued a Case Management Summary Note (CDC.03) which included a section entitled 'Main Considerations'. There are two main considerations; the first relates to the historic environment and character and appearance, the second is:

***"The effect of the proposed development on local transport, with particular regard to sustainable travel, effects on the road network and highway safety, and the amount of parking to be provided."***

1.2.5 This proof of evidence addresses the second, transport-related, area of consideration only.





## 2.0 POLICY CONTEXT

### 2.1 National Planning Policy Framework (2021)

2.1.1 Section 9 of the National Planning Policy Framework (the “Framework”) is entitled ‘Promoting sustainable transport’ and includes a sub-section entitled ‘Considering development proposals.’

2.1.2 Paragraph 105 states that:

***“Significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.”***

2.1.3 The Application Site is in a highly sustainable location immediately adjacent to Cricklewood Station. The existing PTAL<sup>1</sup> level is 5 (Very Good) at the front of the Application Site and 4 (Good) at the rear of the Application site, on a scale of 0 (worst) to 6b (best). The Proposed Development will provide a new, more direct pedestrian route to the bus stops on Cricklewood Lane and to Cricklewood Station, thereby increasing the access level at the rear of the Application Site. The revised Transport Assessment demonstrates that the Application Site is very well located to reduce the need to travel, promote sustainable travel choices and reduce reliance on the private car.

2.1.4 Paragraph 107 states that when setting local parking standards, policies should take into account:

- (a) the accessibility of the development;
- (b) the type, mix and use of development;
- (c) the availability of and opportunities for public transport;
- (d) local car ownership levels; and
- (e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles

2.1.5 Paragraph 110 states when considering development proposals, it should be ensured that:

***“a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location”***

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<sup>1</sup> Public Transport Access Level (TfL)



The Planning Application was supported by a Transport Assessment ("TA") (CDA.19) and Framework Travel Plan ("FTP") (CDA.12) dated July 2020 and a revised TA dated March 2021 (CDA.25), prepared in accordance with the Planning Practice Guidance entitled *"Travel Plans, transport assessments and statements in decision taking"* (2014) published by the Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities ("DLUHC")). The revised TA (CDA.25) assessed the accessibility of the site by sustainable modes of travel and included measures to promote sustainable travel to and from the Application Site, which measures would be secured by a planning condition and/or section 106 obligation.

2.1.6 Paragraph 110 also states that development proposals should ensure:

***"b) safe and suitable access can be achieved for all users"***

2.1.7 All matters, including layout, are reserved as part of the Application, except access. Means of access from the public highway (and accesses from Depot Approach) will be determined as part of this application but internal routes for pedestrians and cyclists are illustrative and will be determined as part of layout and landscaping reserved matters applications. The revised Transport Assessment demonstrates that safe and suitable means of access can be provided for pedestrians, cyclists and drivers in accordance with paragraph 110 of the Framework.

2.1.8 Paragraph 110 further provides that development proposals should ensure:

***"d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree"***

2.1.9 Paragraph 110 d) of the Framework is very important when considering the effects of development on the local transport network. All development by its very nature will have some form of effect on the transport network. It does not follow that those effects will always be adverse. Furthermore, if the development is found to cause adverse effects, then mitigation measures to be delivered by the development will often negate these effects and indeed may result in an overall improvement in local transport conditions. Importantly, paragraph 110 d) states that those mitigation measures should be cost effective. It also states that adverse effects should be mitigated 'to an acceptable degree'. This clearly requires a level of professional judgement by the local planning and highway authorities as some level of residual effects may still be considered acceptable when judged against the benefits delivered by the proposed development.



2.1.10 Paragraph 111 states that:

***“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”***

2.1.11 Paragraph 111 demonstrates that national planning policy does not consider it appropriate that developments should plan for or achieve ‘nil detriment’ traffic conditions. In principle, some increase in delay and congestion is acceptable up to a point where the results become severe. As with paragraph 110, paragraph 111 also acknowledges that some level of effect on safety or highway capacity may still be acceptable. Again, it is necessary for a competent and suitably qualified person to assess whether any impacts on highway safety would be acceptable or unacceptable, and also whether the residual impacts on the transport network (after mitigation) would be severe. However, it does not take a qualified traffic engineer to understand that a net reduction in traffic generation and the closure of a vehicle access onto an ‘A’ class road would result in an overall improvement in highway conditions, and that additional walking, cycling and public transport journeys, when distributed across the transport network would not necessarily be considered ‘severe’. The revised Transport Assessment (CDA.25) demonstrates that the Proposed Development would result in a significant net reduction in traffic and the closure of an existing access onto an ‘A’ class road; it also demonstrates that the net increase in walking cycling and public transport use would not have a severe effect on the transport network.

2.1.12 The Proposed Development would meet the requirements of Paragraph 112 by giving priority to pedestrians and cyclists and facilitating access to high quality public transport. The Proposed Development would also address the needs of people with disabilities and reduced mobility and, as demonstrated in the Healthy Streets assessment within the revised Transport Assessment, create a place that is safe, secure and attractive. The Proposed Development would also allow for the efficient servicing and access for emergency vehicles; and provide charging points for ultra-low emission vehicles in convenient locations.

2.1.13 Paragraph 126 refers to the need for good design to be a key aspect of sustainable development, creating better places in which to live and work and making development acceptable to communities. With regard to matters of highway and transportation, this paragraph is relevant to the illustrative layout, means of access, and the proposed off-site improvements for pedestrians, cyclists and public transport passengers.



2.1.14 Paragraph 130 refers to the quality and visual attractiveness of the development and ensuring that it is sympathetic to the local character and setting. With regard to highways and transport, paragraph 130 f) states that developments should:

***“f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”***

2.1.15 Clearly, means of access to the development, as well as the internal layout, will contribute to creating a safe place. Furthermore, a good level of provision for pedestrians, cyclists and those with mobility impairments, will ensure that the development is accessible for all, and will promote sustainable and healthy travel choices. The revised TA (March 2021) (CDA.25) included an Active Travel Zone assessment, which incorporated a Healthy Streets appraisal of the internal (illustrative) routes and the overall improvements to Depot Approach and Cricklewood Lane that would be delivered by the Proposed Development. The Healthy Streets appraisal demonstrated that the Proposed Development would comply with paragraph 130 of the Framework.

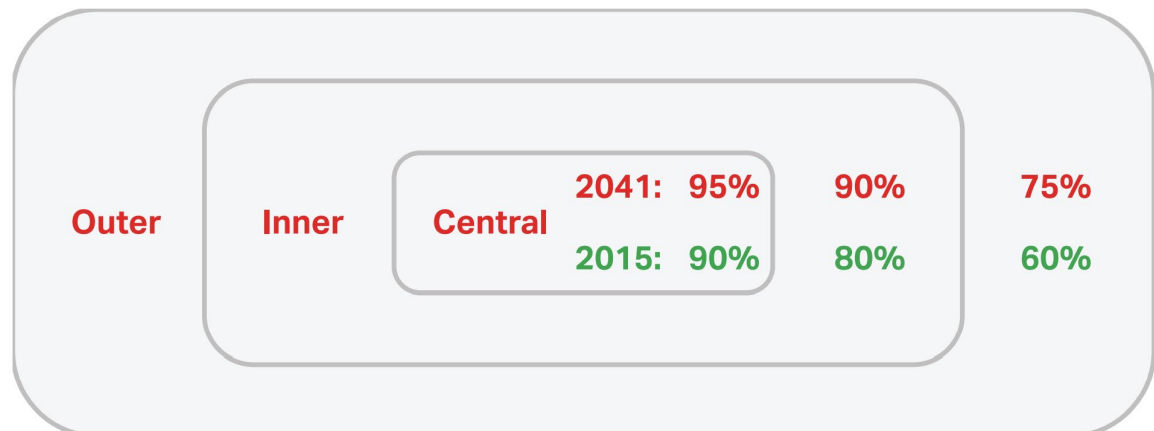
## **2.2 London Plan (2021) (CDE.02)**

2.2.1 Section 10 of the London Plan 2021 (‘LP2021’) is entitled ‘Transport’ and includes Policy T1 ‘Strategic approach to transport’; Policy T2 ‘Healthy Streets’; Policy T4 ‘Assessing and mitigating transport impacts’; Policy T5 ‘Cycling’; Policy T6 ‘Car Parking’, and Policy T7 ‘Deliveries, servicing and construction’, all of which are directly relevant to the Proposed Development and the transport-related matters for consideration.

2.2.2 Policy T1 states that development proposals should facilitate the Mayor’s target of 80% of all trips in London to be made on foot, cycle or public transport by 2041. Figure 10.1 of the London Plan is replicated below:



**Figure 2.1 – Change in mode shares within central, inner and outer London expected to be required for a city-wide shift from 63 to 80 per cent share for walking, cycling and public transport. (London Plan Figure 10.1)**



- 2.2.3 This shows that the expectation for Outer London is for new development to facilitate a mode shift from 60 to 75% sustainable modes of travel.
- 2.2.4 The Framework Travel Plan, appended to the revised Transport Assessment (CDA.25) set targets for five years after occupation of the Proposed Development, seeking to achieve a mode shift from 66% to 78% walking, cycling and public transport for the residential uses and a mode shift from 84% to 90% walking, cycling and public transport for non-residential uses. In both cases, the targets exceed those of Policy T1.
- 2.2.5 Policy T1 also states that all development should make the most effective use of land. This is further reflected in the maximum car parking standards set out in Policy T6 as discussed below. Policy T1 goes on to state that all development should ensure that any impacts on London's transport networks are mitigated.
- 2.2.6 Policy T2 (Healthy Streets) states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. The Proposed Development would provide new pedestrian and cycling infrastructure within the Application Site which the Healthy Streets assessment in the revised Transport Assessment (CDA.25) demonstrates would be safe, attractive and convenient; it would also provide transport improvements beyond the Application Site boundaries to facilitate walking and cycling in the local area.
- 2.2.7 Policy T2 states that development proposals should demonstrate how they deliver and support the ten Healthy Streets Indicators.



**Figure 2.2 – The Ten Healthy Streets Indicators (London Plan Figure 10.2)**



Source: Lucy Saunders

- 2.2.8 The revised Transport Assessment (CDA.25) includes a Healthy Streets assessment which demonstrates that the internal routes would be of a high quality and that the Proposed Development would improve the Healthy Streets score on Cricklewood Lane.
- 2.2.9 By removing an existing vehicle access onto Cricklewood Lane and providing new direct, attractive and convenient pedestrian and cycle routes, the Proposed Development would reduce the dominance of vehicles and be permeable by foot and cycle to connect to local walking and cycle networks as well as public transport, in accordance with Policy T2.
- 2.2.10 Policy T3 is entitled 'Transport capacity, connectivity and safeguarding' and sets out requirements for Development Plans and development proposals to safeguard land for strategic public transport and active travel infrastructure. No part of the Application Site is



safeguarded in the Local Plan (CDF.03), or Emerging Local Plan (CDF.01) for strategic transport improvements; however, the Proposed Development does safeguard a parcel of land to the south of the railway line so as not to preclude future southern access into Cricklewood Station, and would deliver pedestrian and cycle routes through the Application Site together with enhancements to Cricklewood Green to the benefit of pedestrians and cyclists. This is covered in greater detail in Section 3 of this Proof of Evidence.

2.2.11 Policy T4(c) states:

***“Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified”***

2.2.12 It is an important consideration that mitigation, or measures to promote sustainable travel choices, may be delivered directly or by means of financial contributions agreed with the relevant planning and highway authorities.

2.2.13 Policy T5 sets out requirements for cycling including supporting the delivery of a London-wide network of cycle routes, and the provision of appropriate levels of cycle parking. The Proposed Development will provide a new route for cyclists between Depot Approach and Cricklewood Lane, and will provide short and long-stay cycle parking in accordance with the London Plan Table 10.2 and the London Cycle Design Standards (CDE.17).

2.2.14 Policy T6 sets out maximum parking standards for proposed developments in London. Proposed developments which exceed these maximum standards would be contrary to the London Plan. Policy T6 (A and B) states:

***“Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity”***; and

***“Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy”***

2.2.15 The section of the Application Site that fronts onto Cricklewood Lane has a PTAL rating of 5 (on a scale of 0 to 6b where 6b is the highest) whereas the ‘rear’ portion of the Application Site has a PTAL rating of 4. It is important to recognise that this information is taken from the TfL WebCAT site which shows PTAL ratings in 100m squares. Needless to say, the



accessibility of the Application Site does not adhere to the rectilinear form of these indicative squares, but it is reasonable to conclude that the PTAL score is 5 at the front of the Site and 4 at the rear. Importantly, the lower PTAL rating at the north-western end of the Site is influenced by the walking distance to Cricklewood Station via Depot Approach. This walking distance would reduce if public access was formally allowed through the Proposed Development. This would increase the Access Index on which the PTAL score is based, at the rear of the Application Site.

2.2.16 The London Plan policies T6 and T6.1 and Table 10.3 state that developments in PTAL 5 locations, anywhere in London, should be car free with the exception of disabled persons parking. For Inner London PTAL 2 areas and Outer London Opportunity Areas, the maximum permissible parking would be 0.5 spaces per dwelling.

2.2.17 Policy T6.1 states that residential developments delivering ten or more dwellings must ensure designated disabled parking bays for a minimum of 3% of dwellings and demonstrate how an additional 7% could be provided in future upon request as soon as existing provision is insufficient.

2.2.18 The Illustrative Masterplan (CDA.78) demonstrated that 105 accessible car parking spaces could be accommodated within the Proposed Development, representing one space for every 10 dwellings in accordance with Policy T6.1.

2.2.19 Policy T6 part K states that:

***“Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6 .1 Residential parking) must only do so for parts of London that are PTAL0-1”***

2.2.20 It is clear from this statement that Boroughs are expected to adopt the London Plan standards or more restrictive parking standards; they are not expected to adopt maximum standards higher than those in T6, and minimum standards are only permissible in areas with low PTAL ratings (and then only within the parameters of T6.1)

2.2.21 London Plan policy T7 requires development proposals to facilitate safe, clean and efficient deliveries and servicing; to be designed and managed so that deliveries can be received outside of peak hours; and to enable micro-consolidation to reduce servicing vehicle trips. Layout is a reserved matter but the revised Transport Assessment (CDA.25) included swept





path analyses based on the Illustrative Masterplan, illustrating that the Proposed Development would enable safe and efficient deliveries, servicing and emergency vehicle access. An outline Delivery and Servicing Plan and Construction Logistics Plan were included within the revised Transport Assessment and final versions will be secured by conditions as described in Section 3 of this Proof of Evidence.

## **2.3 Barnet Local Plan – Core Strategy (2012) (CDF.03)**

2.3.1 Policy CS5 of the Core Strategy states that the Council will ensure that development in Barnet respects local context and distinctive local character creating places and buildings of high-quality design. Developments should (among other things) be safe, attractive and fully accessible and provide vibrant, attractive and accessible public spaces. Layout is a reserved matter but the revised Transport Assessment (CDA.25) included a Healthy Streets assessment based on the Illustrative Masterplan which demonstrated that the new and improved public realm would score highly against the ten Healthy Streets indicators and provide safe, attractive and accessible public realm as part of the Proposed Development.

2.3.2 Policy CS9 is a wide-ranging policy entitled ‘Providing safe, effective and efficient travel’ and sets out the Council’s commitment to:

***“Promote the delivery of appropriate transport infrastructure in order to support growth, relieve pressure on Barnet’s transport network and reduce the impact of travel whilst maintaining freedom and ability to move at will.”***

2.3.3 It states that the Council will:

***“ensure that new development funds infrastructure (through Community Infrastructure Levy (CIL), Section 106 and other funding mechanisms) that enables Barnet to keep the existing traffic moving and cope with new movements both by all modes of transport”.***

2.3.4 The Proposed Development will result in a net reduction in vehicle trips to the benefit of local highway operational capacity, and proposes to mitigate any impact of additional walking, cycling and public transport trips by means of new infrastructure, S106 contributions and CIL payment.



2.3.5 Policy CS9 required major planning proposals to be supported by:

***“Transport Assessments, Travel Plans and Delivery and Servicing Plans, mitigation measures and s106 contributions/planning conditions and that adequate capacity and high-quality safe transport facilities are delivered in line with demand for schemes that have phased delivery programmes”.***

2.3.6 The Application was supported by all three documents cited in Policy CS9 and the proposed transport related conditions and obligations are explained in Section 3 of this Proof of evidence.

#### **2.4 Barnet Local Plan – Development Management Policy Document (2012) (CDE.04)**

2.4.1 Policy DM01 is entitled ‘Protecting Barnet’s character and amenity and is similar to Local Plan policy CS5. Part c) states that development proposals should ensure attractive, safe and, where appropriate, vibrant streets which provide visual interest, particularly at street level and avoid blank walls. Part d) states that development proposals should create safe and secure environments and reduce opportunities for crime and minimise the fear of crime.

2.4.2 As stated above at paragraph 2.3.1, layout is a reserved matter but the revised Transport Assessment (CDA.25) included a Healthy Streets assessment based on the Illustrative Masterplan which demonstrated that the new and improved public realm would score highly against the ten Healthy Streets indicators and provide safe, attractive and accessible public realm as part of the Proposed Development.

2.4.3 Policy DM17 is entitled ‘Travel impact and parking standards’. Under the sub-heading of ‘Road safety’ the policy states that the Council:

***“will refuse proposals that unacceptably increase conflicting movements on the road network or increase the risk to vulnerable users.***

2.4.4 The Proposed Development will reduce conflicting movements by removing an existing access onto Cricklewood Lane and reducing vehicle movements on the local highway network; it will make dedicated provision for pedestrians and cyclists through the Proposed Development, details of which will be agreed as part of any reserved matters or full planning application.



- 2.4.5 Under the sub-heading 'Road hierarchy', Policy DM17 states that the Council may:
- “refuse development proposals which would result in inappropriate road use, or adversely affect the operation of roads in an area’.***
- 2.4.6 The Proposed Development will remove an existing access onto Cricklewood Lane and result in a significant net reduction in vehicle trips on the local highway network:
- 2.4.7 Policy DM17 states that major developments with potential for significant trip generation should be in locations which are or will be made highly accessible by a range of transport modes. The Application Site has an existing PTAL rating of 4/5 and the Proposed Development would increase the access level of the rear part of the Application Site. The revised Transport Assessment (CDA.25) demonstrates that the Proposed Development is in a highly sustainable location and is well placed to promote travel on foot, by bike by bus and by train.
- 2.4.8 The Application was supported by a full Transport Assessment including a Framework Travel Plan in accordance with Policy DM17 parts d) and e) respectively.
- 2.4.9 Under the sub-heading of 'f. Local infrastructure needs', Policy DM17 states that:
- “Developments should be located and designed to make the use of public transport more attractive for all users by providing improved access to existing facilities, and if necessary the development of new routes and services, including improved and fully accessible interchange facilities.”***
- 2.4.10 The Application Site is in a highly sustainable location with a high PTAL rating and well placed to promote sustainable travel choices. The Proposed Development will deliver new routes through the Application Site for pedestrians and cyclists, thereby reducing the walking distance to the bus stops on Cricklewood Lane and to Cricklewood Station. In addition, the Proposed Development would safeguard a parcel of land to the south of the railway line so as not to preclude future southern access into Cricklewood Station.
- 2.4.11 Policy DM17 part g) is entitled 'Parking management' and states that new development should provide parking in accordance with the London Plan standards, except in the case of residential development where maximum standards as they apply to the Proposed Development would be:

**Table 2.1 – DMP (2012), Policy DM17 Maximum parking standards**

Dwelling	Maximum permissible parking
1-bedroom flats	1 to less than 1 space per dwelling for development consisting mainly of flats
2-to-3-bedroom flats	1.5 to 1 spaces per dwelling for terraced houses and flats

2.4.12 The policy goes on to state that residential development may be acceptable with limited or no parking within a controlled parking zone (CPZ); and that the applicant may be required to enter into a legal agreement to restrict future occupiers from obtaining on-street parking permits. Other than this statement, the residential parking standards in DM17 take no account of the accessibility of a site, the tenure of the proposed dwellings, the availability of public transport or local car ownership levels, all of which are required by the NPPF paragraph 107.

2.4.13 The Applicant has agreed to a legal agreement to restrict future occupiers from obtaining on-street parking permits.

## **2.5 Emerging Barnet Local Plan (2021) (CDF.01)**

2.5.1 The emerging Barnet Local Plan 2021 to 2036 includes Chapter 11 entitled 'Transport and Communications'.

2.5.2 Policy TRC01 – Sustainable and Active Travel states that:

***“The Council will work to deliver a more sustainable transport network that supports a growing population and prosperous economy by reducing car dependency, encouraging sustainable modes of transport and improving air quality. The Council also recognises that active travel benefits the health of residents while having the lowest environmental impacts”***

2.5.3 Policy TRC01 states that the Council will promote active travel and require developments to address the needs of cyclists and pedestrians by ensuring good connections to public transport and by ensuring a healthy safe and attractive walking and cycling environment within and around the development. The Proposed Development will deliver new dedicated pedestrian and cycle routes into and through the Application Site as well as funding improvements to the walking environment surrounding the Application Site.





- 2.5.4 Policy TRC01 also states that for all major developments, the Council will require planning applications to be supported by a Transport Assessment, Travel Plan, Construction Traffic Management Plan and Delivery and Servicing Plan. The Application included all four of these documents.
- 2.5.5 The policy requires the Travel Plan to set out details on how the proposal minimises any increase in road traffic and how the development will contribute to Barnet meeting its 72% target for sustainable modes by 2041. The proposed development will result in a significant net reduction in vehicle trips and the Framework Travel Plan includes a target of 78% sustainable travel to and from the residential element of the Proposed Development within five years of occupation, and 90% sustainable travel for the non-residential modes, exceeding the requirements of TRC01.
- 2.5.6 Policy TRC03 of the emerging Local Plan is entitled 'Parking Management'. In keeping with Policy DM17, it states that development should provide parking in accordance with the London Plan standards except in the case of residential development. For residential development, the maximum permissible parking provision is set out in Table 23, an extract from which is included below.

**Table 2.2 – Emerging Barnet Local Plan – Residential car parking standards (Table 23)**

PTAL	Maximum spaces per unit	
	1 to 2 bed units	3+ bed units
4	0.5-0.75	0.5-0.75
5	Car free	Car free

- 2.5.7 For PTAL 4 locations the table has a note which states:  
***“When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum.”***
- 2.5.8 The Proposed Development is a higher density development and in a highly accessible location so the lower standard (max. 0.5 spaces per dwelling) should be applied, thereby bringing the standard in line with the London Plan policy T6.1. Similarly, for car free development the note states that parking for disabled persons should be provided in accordance with Policy T6.1.



2.5.9 The emerging Local Plan states at paragraph 11.12.2 that Barnet's Car Parking Study sets out the basis for a locally specific approach to parking provision. It states that the Council intends to apply the standards set out in Table 23 (Table 2.2 above) with sensitivity to local circumstances. It states that the accessibility of individual locations will be taken into consideration based on:

- The public transport accessibility level (PTAL);
- Travel Time Mapping (TIM);
- Opportunities for sustainable orbital travel
- Orbital access by public transport ;
- Parking stress including the level of on-street parking control;
- Population density and parking ownership of surrounding areas;
- Location and proximity to local services (i.e. is it in a town centre)
- Ease of access by cycling and walking; and
- Other relevant planning or highways considerations, such as to whether the proposal is a conversion of an existing use.

2.5.10 This is generally in keeping with NPPF paragraph 107.

2.5.11 The Application Site spans the boundary of PTAL 4 and PTAL 5, for which different maximum parking standards apply. The revised Transport Assessment (CDA.25) demonstrates in Section 5 that parking for Blue Badge holders is unlikely to exceed 3% in the foreseeable future, so the provision of 105 parking spaces for 1049 new dwellings would make allowance for up to 10% parking for disabled persons parking, but in practice is effectively a low-car development rather than a car-free development. This is in accordance with Policy 6.1 of the London Plan and DM17 of the Emerging Local Plan. The Framework Travel Plan includes the introduction of car club parking on-site; the Car Club would be available for new residents and the wider community. This significantly reduces parking demand as new residents (and existing neighbours) would have access to a vehicle as and when they need one for essential journeys, even if they did not own a vehicle themselves. The evidence demonstrates that the proposed level of car parking would meet the needs of the Proposed Development.







## 3.0 EXISTING AND PROPOSED TRANSPORT CONDITIONS

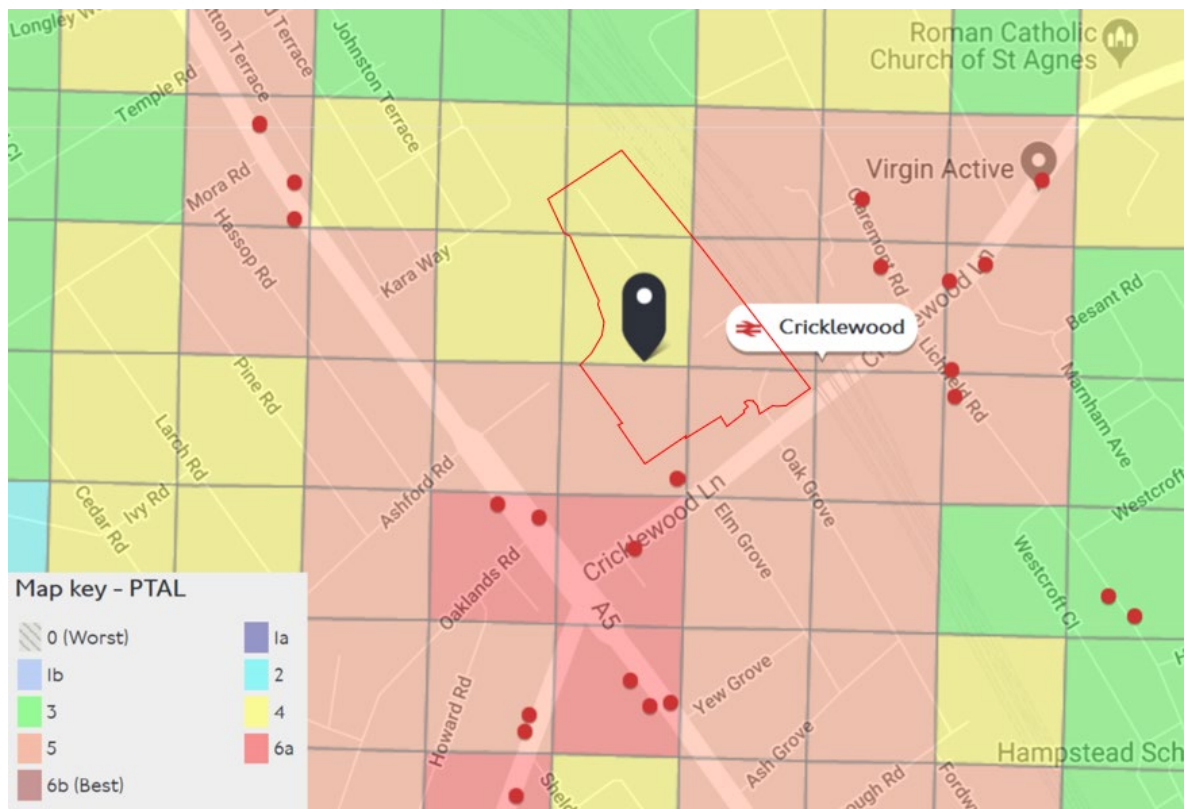
### 3.1 Existing uses

- 3.1.1 The Application Site is currently occupied by a retail warehouse (use class E, but Use Class A1 at the time of the Application) owned and operated by B&Q. Two additional smaller retail warehouse units (Poundstretcher and Tile Depot) adjoin B&Q. The combined gross floor area (GFA) of the existing retail units is 7,990m<sup>2</sup>. A small temporary office has been located within the car park for at least five years from which 'We buy any car, Cricklewood' trades under licence from the site owners.
- 3.1.2 The Application Site incorporates a privately owned and managed car park with 470 car parking spaces. The Application Site has three vehicular accesses, one of which joins Cricklewood Lane (A407) whereas the other two join Depot Approach. The Cricklewood Lane access is a priority junction with a narrow ghost right-turn lane for drivers turning right into the Application Site, and a restricted-movements layout preventing right turns out of the Application Site. The two accesses onto Depot Approach comprise the service access and a second access into the private car park. The service access takes the form of a wide bellmouth (to allow for large service vehicles) with gates at the back edge of the pedestrian footway. The service yard serves all three retail units situated within the Application Site. The car park entrance on Depot Approach is another wide bellmouth with entry and exit lanes divided by a central splitter island.
- 3.1.3 The entry and exits are gated, and signage indicates that the private car park is for customer use with a maximum stay of three hours.

### 3.2 Existing transport conditions

- 3.2.1 The Application Site is located in an area with a 2011 PTAL rating of 4/5. The PTAL rating for the site takes into account the time taken to access the public transport networks. It should be noted that the TfL forecast PTAL ratings for 2021 and 2031 remain the same across the whole of the Application Site. The junction of Depot Approach and the A5 is expected to rise from PTAL 5 to PTAL 6a but that falls outside the Application Site. A 2011 baseline PTAL contour plan is included below as Figure 3.1.

**Figure 3.1 – PTAL contour plan (2011 base)**



3.2.2 Figure 3.1 illustrates that the section of the Application Site that fronts onto Cricklewood Lane has a PTAL rating of 5 whereas the ‘rear’ portion of the Application Site has a PTAL rating of 4. It is important to recognise that this information is taken from the TfL WebCAT site which shows PTAL ratings in 100m squares. Needless to say, the accessibility of the Site does not adhere to the rectilinear form of these indicative squares, but it is reasonable to conclude that the PTAL score is currently 5 at the front of the Application Site and 4 at the rear. The lower PTAL rating at the north-western end of the Application Site is influenced by the walking distance to Cricklewood Station via Depot Approach. This walking distance would reduce if public access was formally allowed through the Application Site, reducing the walking distance to the bus stops on Cricklewood Lane and to Cricklewood Station, thereby increasing the access level.

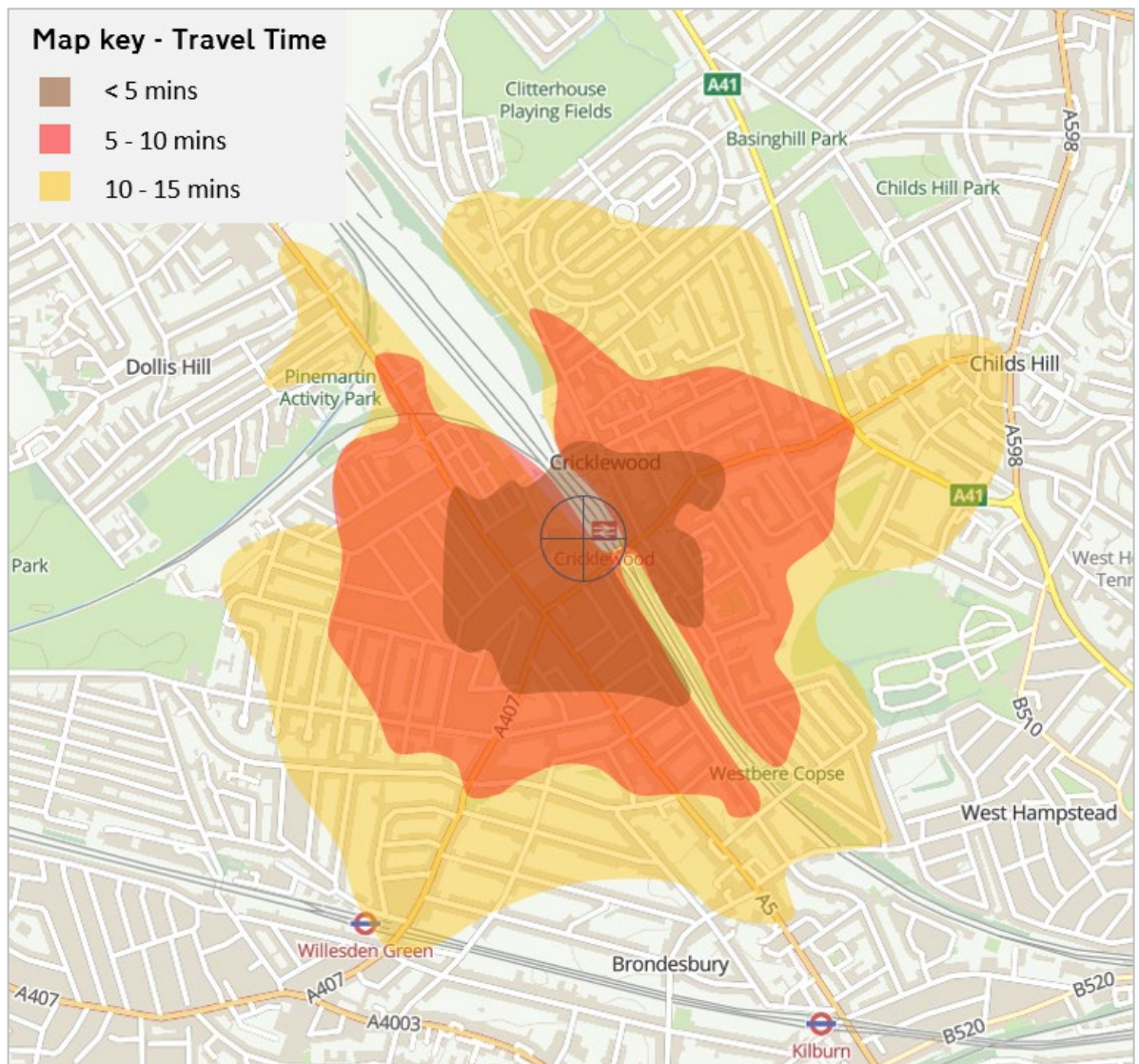
3.2.3 Transport for London describe PTAL 4 as ‘Good’ level of accessibility and PTAL 5 as ‘Very Good’, indicating that residents, staff, or visitors in this location would not be solely reliant on travel by private car. This is a good location to promote travel by sustainable modes.

3.2.4 Cricklewood Lane (A407) is a local distributor road joining the Cricklewood Broadway (A5) to the south-west and Hendon Way (A41) to the north-east.



- 3.2.5 Depot Approach is a private cul-de-sac serving a range of commercial premises including the Application Site, Beacon Bingo (premises and two car parks), Jewson building supplies, hand car wash, tyre supply and fitting business and a vacant development plot (at the time of the application). Each of these businesses attract vehicular traffic in the form of customer cars and large service vehicles.
- 3.2.6 Depot Approach takes access from Cricklewood Broadway (A5) by means of a four-arm signal-controlled junction with yellow hatched box-junction markings.
- 3.2.7 All service vehicles visiting the Application Site currently use Depot Approach. Customers arriving at the Site from the north-west generally use Depot Approach. Those arriving and departing to and from the north-east generally use the Cricklewood Lane access. Those arriving from the south have a choice of either access, but the right-turn ban out of the Cricklewood Lane exit means that all those leaving the Site to the south would use Depot approach.
- 3.2.8 Surveys carried out in June 2019 identified any traffic using the Site car park as a short-cut to avoid the Cricklewood Lane/A5 traffic signals. The survey identified 40 drivers cutting through the car park from Depot Approach to Cricklewood lane during the morning peak hour (0800-0900) and 41 during the evening peak (1700-1800). In the reverse direction, the survey only identified 2 or 3 vehicles during the peak hours. This traffic represents a small proportion of the overall traffic generated by the Application Site, but should not be using the car park as a 'rat-run' and would be redirected onto the public highway as a result of the Proposed Development.
- 3.2.9 Figure 3.2 below shows walking distances from the Application Site, based on TfL's PTAL criteria of 4.8km/hour average walking speed (80m per minute). This demonstrates that most local services, shops and transport hubs are located within a 5-minute walk in distance from the Application Site, and that a wide range of additional retail, employment and educational facilities are located within easy walking distance of the Application Site. This pedestrian isochrone plan has been updated from the 'walking radii' plan included in the revised TA (CDA.25).

**Figure 3.2 – Walking isochrones.**



3.2.10 The Application Site benefits from good existing pedestrian facilities. An audit of pedestrian facilities within the identified Active Travel Zone (ATZ) shows that on the primary pedestrian desire lines, footways are wide and well lit. The ATZ assessment described in Section 10 of the revised TA, identified that there is a degree of street furniture ‘clutter’ on some principal routes, but not to the degree that it results in any unacceptable footway widths. All pedestrian crossing points across side roads and across primary links, benefit from flush dropped kerbs (max upstand 6mm) and tactile paving.

3.2.11 There are two existing uncontrolled pedestrian crossing points over Cricklewood Lane within the extent of the Application Site frontage (either side of the existing site access). These have dropped kerbs, tactile paving, central refuges with reflective bollard, and dedicated lighting. The ATZ assessment identified that these refuges are less than 2m wide

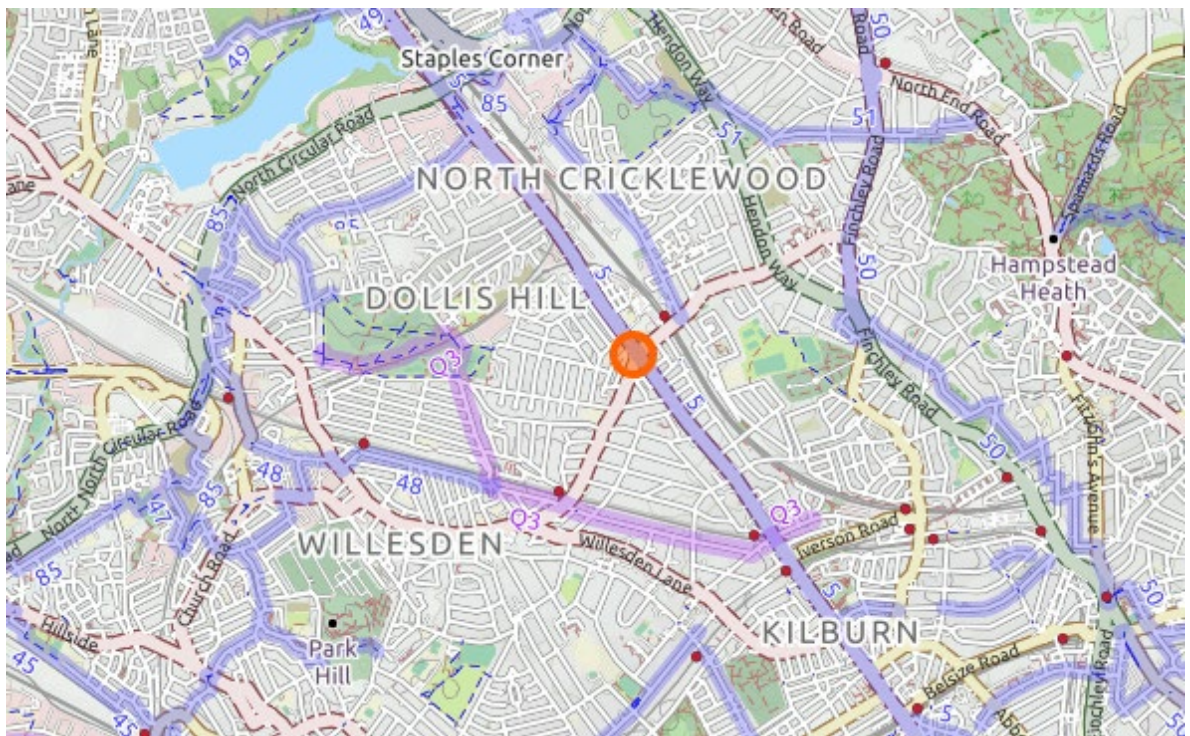


so whereas they provide a safe refuge for pedestrians they do not cater well for wheelchair users or pedestrians with pushchairs or trolleys. The Proposed Development will deliver a new controlled crossing to replace one of the uncontrolled crossings; the precise location of which will be determined as part of any reserved matters or full application where layout and landscaping are determined.

- 3.2.12 The rail line causes a degree of severance for pedestrians wishing to walk north-eastwards from the Site but the route beneath the rail line is lit and the artwork introduced in 2015 makes this a relatively pleasant underpass. The Proposed Development will deliver further improvements to the footway and to the underside of the bridge by means of s278 and/or s106 agreement.
- 3.2.13 The junction of Cricklewood Lane/Cricklewood Broadway/Chichele Lane was upgraded in 2021 and now includes improved crossing facilities for pedestrians and advance cycle stop lines on all four arms.
- 3.2.14 The site is well placed to promote journeys on foot with very few barriers to deter walking as a primary mode of travel. The Proposed Development will introduce highway improvements to improve the route to Cricklewood Station and improve crossing facilities over Cricklewood Lane. The removal of an existing vehicle access onto Cricklewood Lane as part of the Proposed Development will also improve highway conditions for pedestrians.
- 3.2.15 Specific cycle infrastructure is limited in Cricklewood, but many local roads are suitable for travel by bike. Figure 3.3 indicates the local roads that have been considered suitable for cycling, with the short stretch of Quietway 3 (running between Regent's Park and Gladstone Park) also shown. There are also a number of leisure routes in nearby Hampstead Heath.



**Figure 3.3 - Local cycle infrastructure.**



3.2.16 Despite the limited segregated infrastructure, it is very possible to reach a large area within a 20-minute cycle from the Application Site, as shown in Figure 3.4.

**Figure 3.4 – Cycle isochrones**





3.2.17 The Application Site is well placed to promote travel by bike. The 20-minute isochrone illustrated in Figure 3.3 constitutes the Active Travel Zone for cyclists.

3.2.18 The Application Site is also well placed for travel by bus. The current summary of bus routes available within a maximum 300m walk from the Application Site is shown in Table 3.1 below.

**Table 3.1 – Bus route summary (December 2022)**

No	Details	Duration	Frequency
16/N16	Cricklewood – Kilburn - Victoria	0626-0110	10-12 mins
32	Edgware - Burnt Oak - Cricklewood - Kilburn	0600-0053	7-8 mins
189	Brent Cross- Cricklewood-Marble Arch	24hr	9-12 mins
226/N266	Ealing - Cricklewood - Pennine Drive - Golders Green	0508-0113	12 mins
245	Alperton - Cricklewood - Golders Green	0525-0010	10-12 mins
260	Golders Green - Cricklewood - White City	0514-0019	12 mins
266	Brent Cross- Cricklewood- Acton	0640-0037	10 mins
316	Cricklewood - Queen's Park - White City	0549-0038	12 mins
332	Neasden Tesco - Cricklewood - Kilburn - Paddington	0544-0043	10-12 mins
460	North Finchley- Cricklewood- Willesden	0538-0039	12 mins
632	Kilburn Park - Cricklewood -Grahame Park	0750-0754	3 per day

3.2.19 Table 3.1 shows that the Application Site benefits from excellent bus provision. The services which stop within easy walking distance of the Proposed Development provide access to a very wide area at a high frequency. Importantly, the frequency is such that those using the bus do not have to schedule their travel according to a timetable but can simply walk to the bus stop and catch the next bus to their destination, usually with a maximum wait of no more than 5 or 6 minutes. This facility makes using the bus for travel to work or education, convenient and attractive.

3.2.20 The Application Site's proximity to Cricklewood Railway Station in fare zone 3 means that it is extremely well placed for travel by rail. A short walk (less than two minutes) along the wide footway in front of Cricklewood Green and under the railway bridge provides a safe and attractive route to the station. The station has a small amount of CCTV monitored cycle



storage and is served by a number of bus routes; however, these facilities are of greater use to the wider community as the close proximity of the station to the Application Site means that residents and visitors to the Proposed Development are most likely to walk to and from the station. Table 3.2 summarises the services from Cricklewood station.

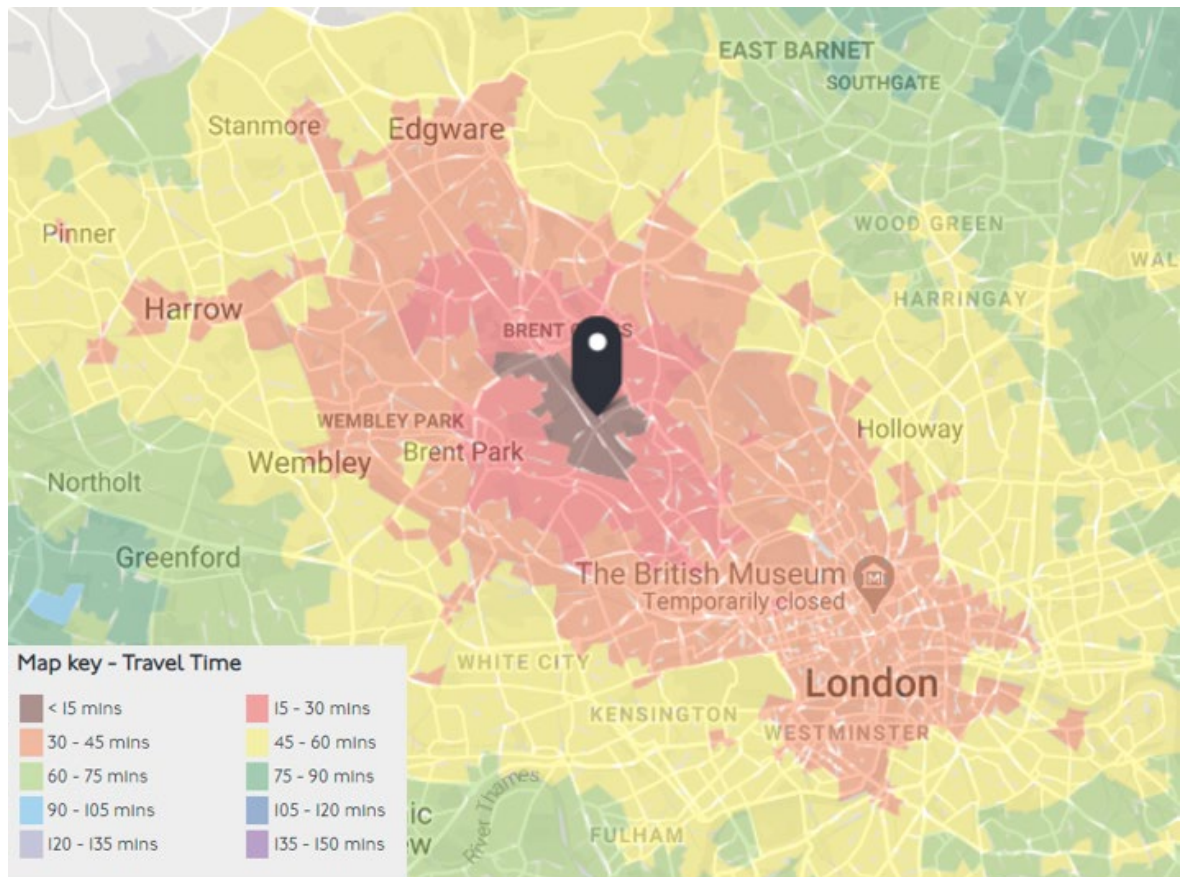
**Table 3.2 – Summary of existing rail services from Cricklewood Station**

Route	Duration	Frequency	Capacity
Sutton (Surrey)	0458-2331	15 mins	8 carriages
Sutton via Wimbledon	0317-2331	15mins	8 carriages
Luton	24hr	30 mins	8 carriages
London Blackfriars (on Sutton route)	24 hours	15 mins	8 carriages
St Albans	24 hours	15 mins	8 carriages

- 3.2.21 This shows that at present the trains stopping at Cricklewood Station provide an average of 8 trains per hour, with 4 northbound and another 4 southbound, equating to 32 carriages in either direction, or 144 trains per day (tbd).
- 3.2.22 Cricklewood Station originally comprised a series of red-brick Victorian buildings with associated forecourt and grounds; however the wider grounds are now used for a separate commercial business (Station House Reclamation) and the ticket hall comprises the westernmost portion of the former station house. The ticket hall has a single counter for ticket purchases but also has a ticket machine. The automatic barriers are compatible with Oyster and contactless payment.
- 3.2.23 Access to the ticket hall is gained on foot by means of a wide walkway from Cricklewood Lane. This approach was upgraded in 2015 to include extensive planting and distinctive artwork. The subway beneath the rail lines was upgraded in 2014.
- 3.2.24 TfL records multi-modal journey times across the capital and provides forecast for future journey times taking account of committed transport improvements. The 2021 journey times for the Site are shown in Figure 3.5 below.



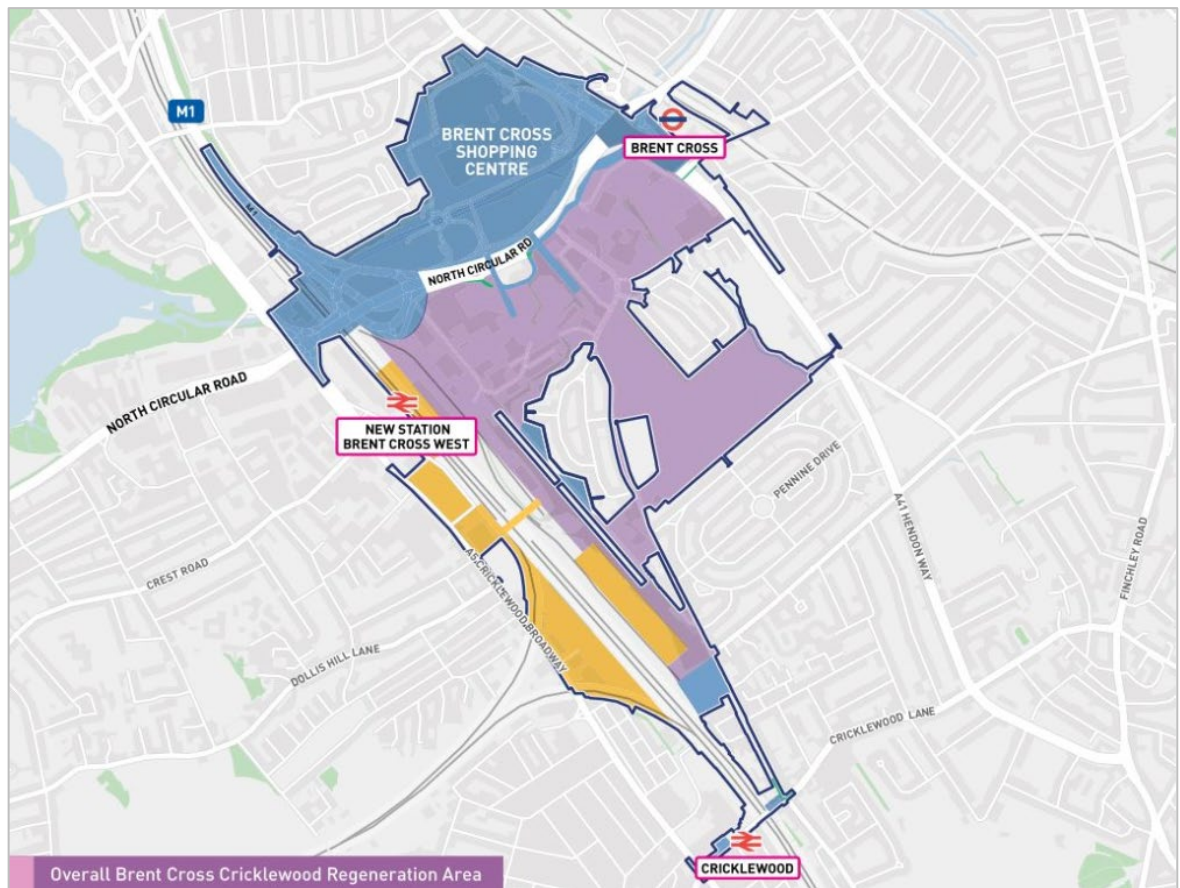
**Figure 3.5 – Multi-modal travel times (TfL 2021 forecast)**



3.2.25 Figure 3.5 shows a large catchment within 15-30 minutes travel time from the Site and a very extensive catchment within 45 minutes of the Site, extending from Edgware in the north to Westminster in the south.

3.2.26 In May 2020, the Council granted final approval for the new Brent Cross West station, to the north of Cricklewood. Although outline permission had already been granted as part of the Brent Cross regeneration scheme, the LBB strategic planning committee granted planning permission for the new station in May 2020. The new £40 million station is located approximately halfway between Hendon and Cricklewood stations as shown in Figure 3.6 below.

**Figure 3.6 – Brent Cross West rail station**



- 3.2.27 The new station has four platforms, two of which will be used by slow stopping services. The forecast capacity is a peak of eight trains per hour and an off-peak service of four trains per hour. Construction of the new station is scheduled to be complete in early 2023, following which there will be a period of testing and commissioning as is usual with all new stations.
- 3.2.28 A full description of the local transport network at the time of the application is included in Section 3 of the revised TA (CDA.25) including a full ATZ assessment and Healthy Streets review. A description of any subsequent changes to the local transport network is included in the Transport Statement of Common Ground (CDI.04).
- 3.2.29 The evidence clearly demonstrates that the Application Site is highly accessible on foot, by bike, by bus or using rail services. The introduction of Brent Cross West station and other committed transport improvements will increase the Application Site's accessibility further and reduce travel times to key employment, retail, health and leisure facilities. The Application Site is clearly well placed to promote travel by sustainable modes of transport and reduce reliance on the private car.





### **3.3 Proposed transport conditions**

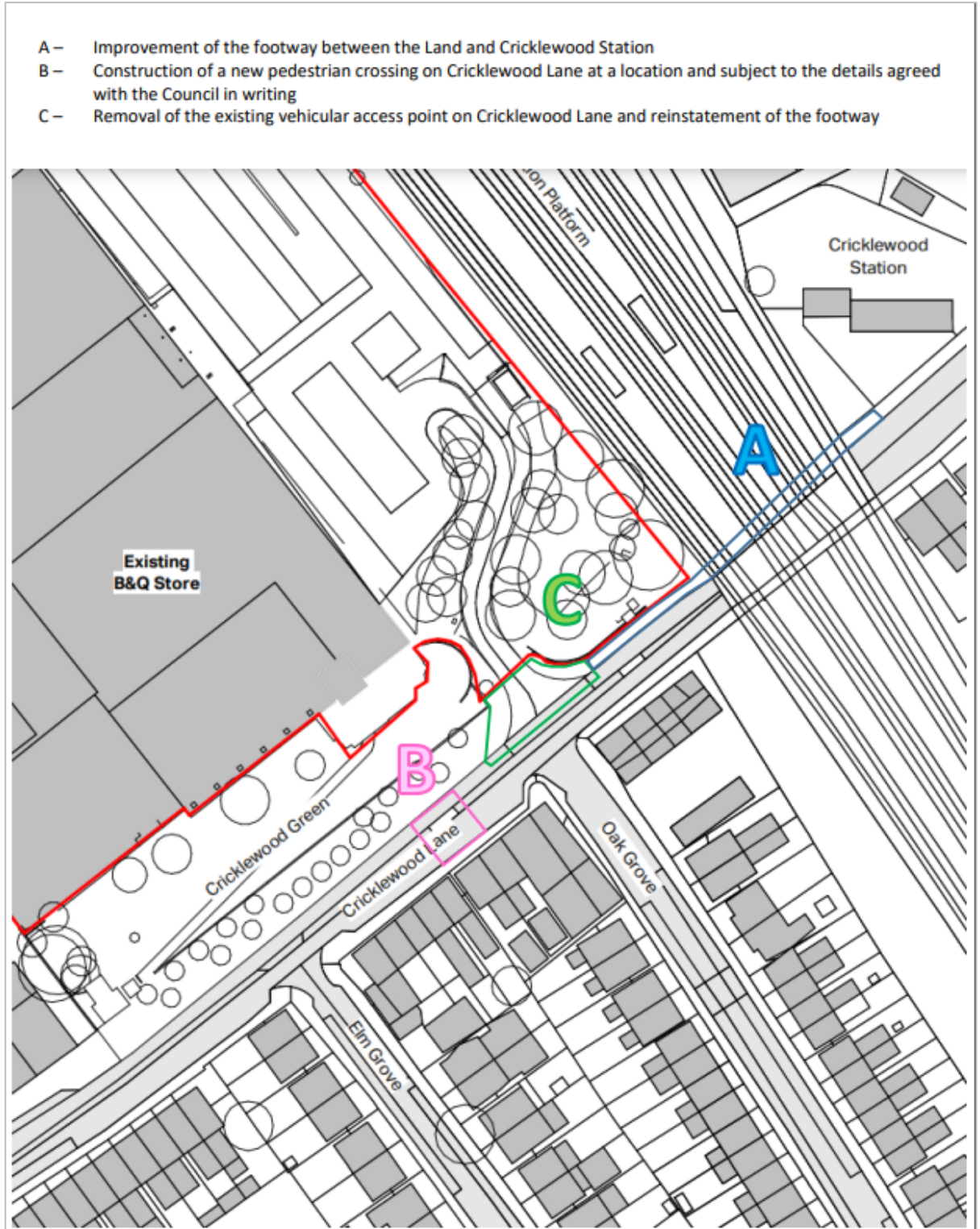
- 3.3.1 The Proposed Development will deliver significant improvements to the public realm, including the creation of a new public square and a high-quality pedestrian and cycle route through the site, linking Depot Approach and Cricklewood Lane. This new public realm will create new cycle and pedestrian accesses into the Application Site but also create new direct, attractive routes between the centre of Cricklewood and future development land to the north-west of the Application Site.
- 3.3.2 Cricklewood Green does not form part of the Application, but the movement strategy includes new landscaped routes through Cricklewood Green which are expected to be secured by means of a legal agreement pursuant to Section 106 of the Town and Country Planning Act 1990.
- 3.3.3 The closure of the existing vehicle access onto Cricklewood Lane will improve the pedestrian realm along Cricklewood Lane and, by virtue of removing vehicle turning movements, improve highway safety in this location.
- 3.3.4 The Proposed Development will take vehicle access from Depot Approach, a private access road over which the Application Site has a right of access. These accesses have been designed with both pedestrian and cyclists in mind. The access dimensions have been designed to operational minimal width, for the benefit of pedestrians. The access widths and radii will ensure slow vehicle speeds and reduce pedestrian crossing distance to a minimum in line with best practice. In discussion with the local highway authority, the accesses were amended to include side road entry treatments (SRET), designed in accordance with TfL standard details, making enhanced crossing provision for pedestrians and further slowing vehicle entry and exit speeds. The proposed vehicle accesses are shown in core document CDA.83.
- 3.3.5 The Illustrative Masterplan (CDA.78) includes an internal road network that retains a traffic-free public realm through the heart of the Proposed Development but delivers vehicle access routes for car parking and servicing around the perimeter of the Proposed Development. The proposed movement strategy and servicing routes are described in detail in Section 4 of the revised Transport Assessment (CDA.25).
- 3.3.6 The Proposed Development includes a range of transport improvements and measures which would be secured by planning condition or S106 obligation as follows:
- 3.3.7 As stated in the revised TA (CDA.25), the development will be supported by a Transport Implementation Strategy (TIS) comprising:



- Residential Travel Plan (RTP) [S106]
  - RTP Incentive fund up to £330,000 [S106]
  - Commercial Travel Plan (CTP) [S106]
  - Construction Management, Environmental and Logistics Plan (CMELP) [condition 5]
  - Car Parking Design and Management Plan (CPDMP) [condition 9]
  - Delivery and Servicing Plan (DSP) [condition 7]
- 3.3.8 The TIS comprises a suite of management documents that will control and regulate the movement of people and goods to and from the Proposed Development and promote sustainable travel choices for residents, employees and visitors.
- 3.3.9 Due to the outline nature of Application, a Framework Travel Plan (FTP) (CDA.12) was prepared (and appended to the revised TA (CDA.25)) to cover the residential, commercial and community uses. The RTP Incentive Fund represents £300 per dwelling for residents to select 2 out of 3 travel incentives including a bike voucher, Oyster card, Car Club membership/use. The purpose of the RTP Incentive Fund is to encourage new residents to try sustainable travel modes that they may otherwise not have considered.
- 3.3.10 Outline DSP and CLPs were included as Sections 8 and 9 of the revised TA. Final versions of all TIS documents would be secured by planning condition to be submitted and approved prior to commencement or occupation as appropriate.
- 3.3.11 In addition to the TIS, the Proposed Development would deliver physical transport improvements as follows:
- Improvements to public realm including Cricklewood Green enhancements [S106];
  - Land safeguarded so as not to preclude future southern access into Cricklewood Station [S106];
  - Contribution towards improvements to the underside of the rail bridge [S106];
  - New Car Club parking for new residents and wider local community [condition];
  - New pedestrian/cycle routes between Depot Approach and Cricklewood Lane [condition];
  - New public realm designed on Healthy Streets principles [condition 29];
  - Contribution to upgrade an uncontrolled crossing on Cricklewood Lane to a Puffin crossing (location to be agreed as part of any reserved matters or full planning allocation where site layout is determined) [S106 or S278];
  - Removal of existing vehicle access from Cricklewood Lane [S278];
  - Improve footway between Site and Cricklewood Station [S278];

3.3.12 The proposed highway improvement works to be carried out under an agreement with the local highway authority pursuant to Section 278 of the Highways Act 1980 are illustrated in Figure 3.7 below.

**Figure 3.7 – Proposed highway improvement works**





## 4.0 INFORMATION SUBMITTED IN SUPPORT OF THE PLANNING APPLICATION AND AGREED WITH THE HIGHWAY AUTHORITIES

### 4.1 Pre-application discussions

4.1.1 I held a pre-application meeting with the Council Transport Team in 2019 at which we agreed the scope of the Transport Assessment to be submitted in support of the forthcoming planning application for the Proposed Development. At that meeting I informed The Council that we anticipated the Proposed Development would result in a net reduction in vehicle trips compared to the existing retail use. The Council informed me that it had funding for improvements to the junctions of Cricklewood Lane (A407) / Cricklewood Broadway (A5) and Cricklewood Lane (A407) / Lichfield Road / Claremont Road. (NB: These are now listed as Southern Junction 1 and Southern Junction 2 in the Brent Cross Cricklewood regeneration programme). The Council advised that its proposed works were intended to provide improvements for pedestrians and cyclists and therefore, even if the Proposed Development resulted in a net reduction in traffic, our TA should include details of the change in vehicle trips through those junctions so that The Council could take them into consideration in its designs.

### 4.2 Original submission

- 4.2.1 The outline planning application was supported by a Transport Assessment (TA) dated July 2020 (CDA.19) incorporating a three-part Transport Implementation Strategy comprising:
- Framework Travel Plan (FTP);
  - Delivery and Servicing Plan (DSP);
  - Construction Logistics Plan (CLP).
- 4.2.2 Due to the outline nature of the planning application, a Framework Travel Plan was prepared to cover the proposed residential, commercial and community uses. The DSP and CLP were presented as chapters within the TA, but the FTP was a stand-alone document.
- 4.2.3 The TA included an assessment of the transport effects of the Proposed Development and set out a range of proposed transport improvements to be secured by planning condition or obligation.



### 4.3 Revised submission

4.3.1 Following receipt of the consultation response from LBB Transport Team (CDB.10) and GLA Stage 1 report (CDB.01), further work was carried out and a revised TA (March 2021) (CDA.25) was submitted. My covering letter L4 dated 12<sup>th</sup> March 2021 set out in detail the additional work that had been carried out and the revisions included in the TA.

4.3.2 The revised TA included a full Active Travel Zone (ATZ) assessment, prepared in accordance with TfL guidance. In addition, a detailed gravity model was undertaken for pedestrian and cycle movements (including those walking to bus or rail interchanges) which exceeds the TfL ATZ requirements. The gravity model informs any predicted increase in the use of the primary ATZ routes and pedestrian desire lines.

### 4.4 Further information

4.4.1 Following submission of the revised TA, I met with The Council on 14<sup>th</sup> May 2021 and the Council Transport Team made an additional consultation response. I wrote on 26<sup>th</sup> May 2021 (L6) providing Technical Note 5 (Traffic Impact Assessment) (CDA.29); dimensioned site access drawings (including side road entry treatments requested by The Council) and updated vehicle swept path analyses.

4.4.2 Technical Note 5 includes a re-interrogation of the TRICS database to derive more accurate traffic forecasts for the residential element of the development. The existing 470 space retail car park generates 144 vehicle trips in the morning peak hour and 194 in the evening peak hour. The Proposed Development would only generate 40 and 42 morning and evening peak hour vehicle trips respectively. The TIA shows that the development as a whole would result in a net reduction in traffic in Cricklewood, particularly during the peak hours.

4.4.3 When compared to the observed existing retail trips, the Proposed Development would result in a net reduction in peak hour traffic as shown in Table 4.1 below (extracted from Technical Note 5, Table 5.3).

**Table 4.1 – Net reduction in peak hour vehicle trips**

	Arrive	Depart	Total
AM	-94	-10	-104
PM	-50	-103	-152





- 4.4.4 The 2019 traffic survey (appended to the original and revised TAs) showed that the existing retail uses currently generate 4591 vehicle trips per day (including a small number of vehicles rat-running through the car park). The revised Transport Assessment (CDA.25) demonstrated that the combined commercial and community uses would generate 97 vehicle trips per day. Technical Note 5 (CDA.29) (comprising a reassessment of the predicted residential vehicle trips) demonstrated that the residential element of the Proposed Development would generate 265 vehicle trips per day, therefor equating to 362 daily vehicle trips generated by the Proposed Development. The redevelopment of the Application Site would therefore result in a net reduction of 4,229 vehicle trips per day on the local roads in Cricklewood.
- 4.4.5 The Proposed Development includes the removal of the existing limited-movement junction onto Cricklewood Lane to the benefit of pedestrians, cyclists and public transport passengers, and to facilitate a significant improvement to the public realm in the form of landscape improvements to Cricklewood Green and the creation of a new public square. The closure of this vehicle access means that all proposed traffic will use Depot Approach whereas the existing (retail) traffic uses Depot Approach and Cricklewood Lane. However, even taking account of the removal of the Cricklewood Lane junction, the redevelopment of the retail park will result in a net reduction in vehicle trips through the Depot Approach signal junction and the Cricklewood Broadway/Cricklewood Lane signal junction. There will be a small reduction in some individual turning movements and negligible increase in others. The net change will have no material effect on the operational capacity of either junction.

## 4.5 Consultation responses

- 4.5.1 The officer's report to committee dated 9<sup>th</sup> September 2021 (CDD.01) states that the Council as highway authority raises no objection to the Proposed Development subject to conditions and obligations. The GLA Stage 2 report (CDB.02) states that the GLA and TfL have no objection to the Proposed Development subject to conditions and obligations. LB Brent raises no objection to the Proposed Development on highways or transport grounds. LB Camden raises no objection to the Proposed Development on highways or transport grounds (CDB.03 and CDB.04).



## 5.0 MATTERS RAISED BY THIRD PARTIES

### 5.1 Introduction

5.1.1 Neither the Council or TfL has objected to the Proposed Development on transport or highways grounds. This evidence has therefore been prepared primarily on the basis of the Statement of Case prepared by the Rule 6 party and third-party objections submitted to the Council.

### 5.2 Mike Freer, Member of Parliament for Finchley and Golders Green

5.2.1 Mr Freer requested that the Council refuse the application on grounds of the impact on local services, design and scale (25 storeys) out of keeping with the local area, impact on road traffic congestion, and insufficient car parking.

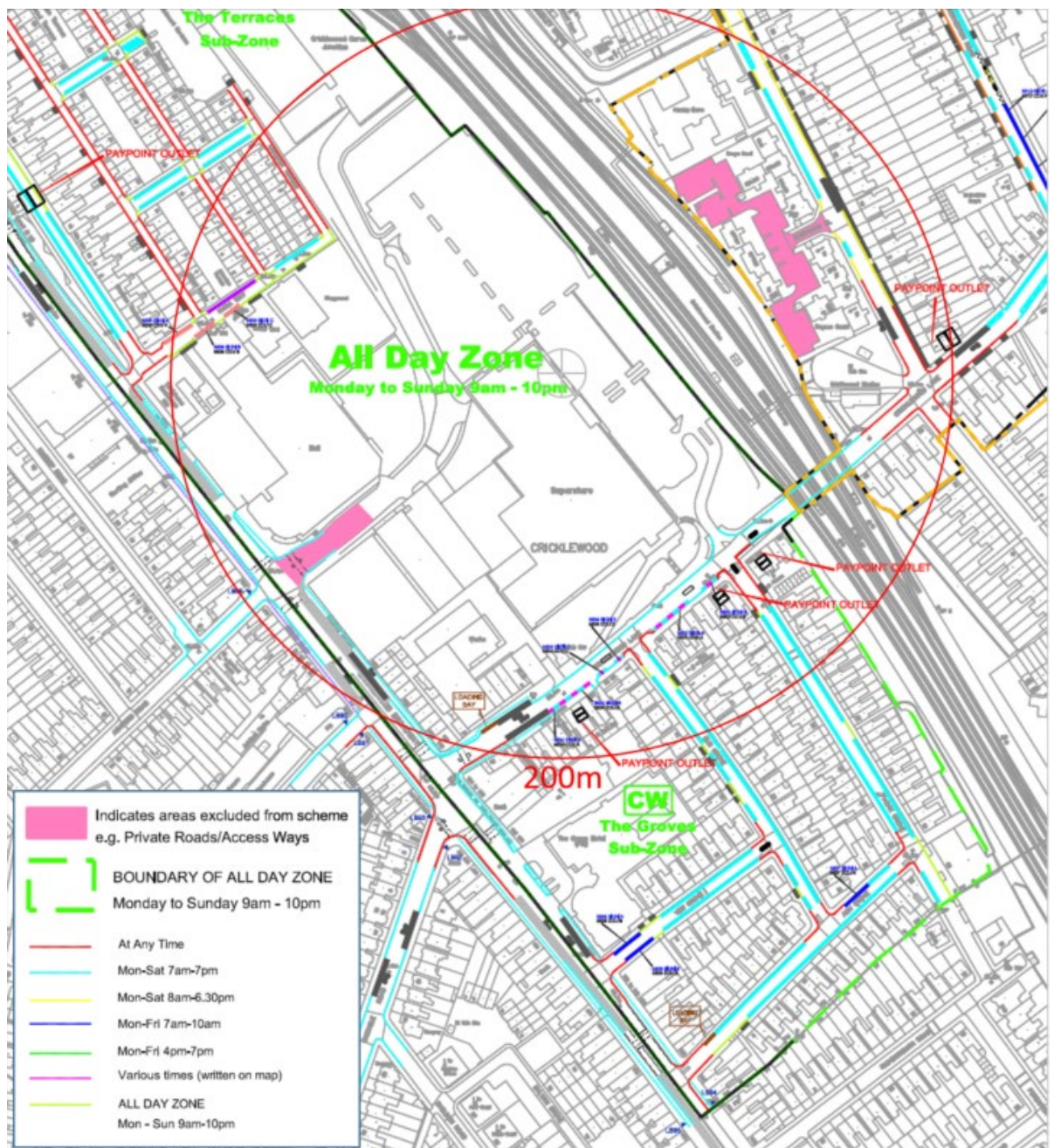
5.2.2 The revised TA (CDA.25) and TN5 (Traffic Impact Assessment) (CDA.29) demonstrate that the Proposed Development would result in a significant net reduction in traffic on the local highway network and thereby have a positive net effect on local highway capacity. This has been agreed by the Council's Transport Team and TfL.

5.2.3 The Proposed Development will provide car parking in accordance with London Plan 2021 Policy T6. The revised TA (CDA.25) demonstrates in Section 5 that parking for Blue Badge holders is unlikely to exceed 3% in the foreseeable future so the provision of 105 parking spaces for 1049 new dwellings would make allowance for up to 10% parking for disabled persons parking, but in practice is effectively a low-car development rather than a car-free development. This is appropriate for a PTAL 4/5 Site, in accordance with Policy 6.1. The Framework Travel Plan includes the introduction of car club parking on-site; the Car Club would be available for new residents and the wider community. This significantly reduces parking demand as new residents (and existing neighbours) would have access to a vehicle as and when they need one for essential journeys, even if they did not own a vehicle themselves. The evidence demonstrates that the proposed level of car parking would meet the needs of the Proposed Development.

5.2.4 The revised TA (CDA.25) demonstrated that all roads within 200m of the centre of the Application Site are either private, and therefore subject to private enforcement, or public highway and subject to waiting restrictions or Controlled Parking Zones (CPZ). The Application Site falls within the All Day Zone which operates seven days a week from 9am to 10pm.

5.2.5 To the north of the Application Site is The Terraces sub-zone, to the south is The Groves sub-zone and to the north-east of the Site (beyond the rail bridge) is the C1 One-Hour Zone.

**Figure 5.1 – Waiting restrictions surrounding the Application Site (from revised TA).**





- 5.2.6 However, the Council's Transport Team stated that as there are roads within 200m walking distance of the *edge* of the Application site, the Proposed Development should make a £42,000 contribution to enable the Council to review the existing CPZ and implement any changes recommended by that review. For clarity, additional plans illustrating 200m walking distance from the edge of the Application Site in relation to LB Barnet, LB Brent and LB Camden parking zones are included as **Appendix A**.
- 5.2.7 The evidence demonstrates that the Proposed Development is not expected to result in any harm as a result of displaced car parking; however, appropriate mitigation is provided by means of a financial contribution.
- 5.2.8 A Car Parking Design and Management Plan would be secured by planning condition (condition 9).
- 5.2.9 The existing 470 space retail car park is privately owned and managed. It has gates on the entries and exits which can be locked by the owner to prevent access. It is classed as private non-residential parking; it is not a public car park. Signs on the entrance state 'No thoroughfare' to deter rat-running and to prevent a route through the Application Site becoming a right or way through long-term use. Separate signs indicate that CCTV is in operation and that trespassing is prohibited. Parking enforcement signs state that parking is for customers only with a maximum permissible stay of three hours. These rules preclude the car park from being available to rail passengers. In practice, some customers may park on the Application Site to visit B&Q and then undertake a linked trip to the Town Centre; however, this cannot be relied upon as a public provision as the terms and conditions of parking on the Application Site are a strictly private matter and can be changed at any time.

### **5.3 Rule 6 party**

- 5.3.1 Section 7 of the Rule 6 party Statement of Case (CDI.06) is entitled 'Transport'. Matters raised in Section 7 are addressed below.
- 5.3.2 The Rule 6 party also raises a transport matter at paragraph 2.7 under the heading of 'Description of Cricklewood'. They assert that four, eight-carriage trains in each direction is a comparatively low level of service for a London train or underground station and that this does not affect the PTAL. That is incorrect; the frequency of trains and the average wait time between trains are both key components in calculating the Access Index (AI) which informs the Public Transport Access Level (PTAL).



- 5.3.3 The Rule 6 party states at paragraph 7.2 that the estimate of 88 additional rail passengers heading south from the Proposed Development during the morning peak hour undermines the case for placing this Proposed Development in such an accessible location, and that the directional split is not well founded.
- 5.3.4 The revised TA (CDA.25) included a new TRICS assessment at The Council's request. The revised assessment showed a combined 133 rail trips in the AM peak, 112 in the PM peak and 1052 across the day. This represents 15% of all daily trips to and from the Proposed Development.
- 5.3.5 The Council queried the figure of 15% travel by rail given the Application Site's proximity to Cricklewood Station. They suggested an assessment of Census data to establish journey to work mode share for Cricklewood. It is important to note that the TRICS data includes all journeys for all purposes, not just journeys to work. Many local journeys such as shopping, primary school, health, leisure etc. will be undertaken on foot or by bike and are clearly not included in the Census journey to work data. For this reason, the journey to work public transport percentages are clearly not representative of the mode share for all journeys. The TRICS data is more reliable for this purpose. The revised TA demonstrated that journeys to work represent just 25% of all daily journeys. Notwithstanding the above, at The Council's request, the journey to work data for the local ward was reviewed. That data showed 41% travel by car and just 11% by rail. When those figures were adjusted to reflect the low level of car parking to be provided as part of the Proposed Development, the resultant mode share gives 15% travel by rail, consistent with the TRICS data assessment. This is explained in detail in Section 11 of the revised TA (CDA.25).
- 5.3.6 It should be noted that the predicted residential mode share would be 17% travel by train during the morning and evening peak periods. This accounts for all journeys, not just journeys to work.

**Table 5.1 – Residential mode share based on revised TA Table 11.7**

	Veh	Pass'ger	Walk	Cycle	Bus	Rail	Total
AM	118	156	193	4	116	123	710
	17%	22%	27%	1%	16%	17%	
PM	85	118	175	2	96	99	574
	15%	21%	30%	0%	17%	17%	
Daily	898	1123	2046	57	980	901	6005
	15%	19%	34%	1%	16%	15%	



- 5.3.7 The revised TA did not include a gravity model of rail trips by destination. As stated above, it is important to note that the predicted 133 AM peak hour rail trips represent arrivals and departures for the proposed residential development and the proposed commercial development combined. The revised TA stated at paragraph 12.12, that *“if we were to assume two thirds travel southbound towards Central London, the predicted trip generation from the Site will result in an additional 2-3 passengers per carriage on the most affected trains”*. It is correct that if more than two thirds of rail passengers associated with the Proposed Development were to travel to and from the Application Site from the south, then the figure could rise from 2-3 passengers to 3-4 passengers. However, even if all 133 AM peak rail trips were departures (which they are not) and even if 100% were to travel southbound (which they would not) then that would equate to 4 additional passengers per carriage. The evidence demonstrates that the effect would clearly be less than this when taking account arrivals and departures, the fact that not all peak hour rail trips are journeys to work, and the future northbound trips to the Brent Cross regeneration area.
- 5.3.8 The Rule 6 party also states at paragraph 7.2 that the information submitted in support of the Application does not indicate how CIL or S106 funds could be used to alleviate overcrowding on trains.
- 5.3.9 Unlike walking, cycling and vehicle trips, developers cannot provide direct mitigation, in terms of capacity, for any increases in public transport passengers. For this reason, the revised TA quantifies the net increase in rail passengers, in common with all recently approved planning applications for development in the Cricklewood area, in order that the Council and/or TfL can evaluate whether a S106 contribution is necessary, or whether a proportion of the Community Infrastructure Levy (CIL) payable by this development should be directed towards increased rail capacity. That is the purpose of CIL, to deliver strategic infrastructure improvements that could not be delivered by individual developments. On this basis TfL raised no objection to the Application (CDB.02).
- 5.3.10 During pre-application discussions, The Council and TfL raised the issue of the capacity of the Cricklewood Station entrance. At present, Cricklewood Station has a single entrance on the north-eastern side, and a subway beneath the rail lines to access the platforms. The Proposed Development will safeguard a parcel of land on the southern side of the rail line, adjacent to the southern extents of the subway, so that a southern entrance and/or ticket officer could be delivered in the future if required. This could not be delivered without the redevelopment of the Application Site.



5.3.11 In the GLA Stage 1 Report (CDB.01), paragraph 71 states:

***“It is expected that the overall proposal would generate an additional 133 and 112 rail trips during the AM and PM peak respectively, from Cricklewood Rail station. It is welcomed that the applicant is committed to safeguard land so as not to preclude future southern access into Cricklewood Station. It is also welcomed that the applicant is willing to provide section 106 contributions towards improvements to the pedestrian route beneath the rail bridge.”***

5.3.12 The Rule 6 party expresses concern at paragraph 7.3 that the information submitted in support of the Application does not evaluate the impact of significant number of cyclists on local traffic and pedestrians. This is incorrect; the revised TA included a detailed assessment of predicted trips by all modes, including cyclists. It showed at Table 11.16 that the Proposed development would be expected to generate 87 cycle trips per day. However, the Framework Travel Plan, appended to the revised TA, set out future targets for sustainable travel, with the aim of increasing cycle trips from 1% to 5% over five years. If 5% of the predicted journeys associated with the Proposed Development were to be by bike, that would equate to 38 trips in the morning peak, 34 in the evening peak and 361 per day (i.e. 180 people leaving and then returning by bike each day). This is the gross travel demand, not the net change compared to the existing use of the Application Site. As stated in the revised TA (CDA.25) paragraph 12.9, when distributed across the local highway network, this increase would be imperceptible to other highway users and would have no adverse effect on capacity, comfort or amenity.

5.3.13 The Rule 6 party draws on certain elements of the ATZ assessment which identified some deficiencies in the junction of Cricklewood Lane / A5 that may deter some cyclists from using this junction. The ATZ assessment included a detailed appraisal of all junctions and crossings surrounding the Application Site. With regards to the Cricklewood Broadway (A5) / Cricklewood Lane / Chichele Road junction, the ATZ assessment described the junction as *“large, intimidating and busy junction with no provisions for cyclists”*. It recommended *“Lower speeds to 20mp, early start arrangements for cyclists at all four arms of junction; and cycle box at traffic lights”*.

5.3.14 Since the ATZ assessment was carried out, the junction has been substantially re-modelled during 2021, including the removal of a building on the north-east corner of the junction to enable a realignment of the carriageway. The junction now has increased inter-visibility between drivers, cyclists and pedestrians, and advance cycle stop lines on all arms. The



works were carried out by the Council and, as the A5 forms part of the TLRN<sup>2</sup>, the works were approved by TfL. The Major's Vision Zero Action Plan commits to introducing 20mph speed limits on all of the TLRN.

- 5.3.15 The material improvements to the junction are in line with the recommendations of the ATZ assessment and have therefore addressed the issues raised at that time.
- 5.3.16 The Rule 6 party is critical at paragraph 7.5 of what they describe as “narrow unsegregated shared-use paths through the development”, asserting that they would not form a public benefit.
- 5.3.17 The proposed internal routes would allow direct and traffic-free routes from the Proposed Development to the public highway for pedestrian and cyclists. The provision of a new route between Depot Approach and Cricklewood Lane would allow some cyclists to use this lightly trafficked (Depot Approach) and traffic-free route to avoid the signal-controlled junction of Cricklewood Lane / Cricklewood Broadway. The Application is an outline application with matters of layout and landscaping reserved. The detailed design of the internal routes will be determined as part of any reserved matters or full planning applications, but it is clear that safe provision can be made for both pedestrians and cyclists through the Proposed Development.
- 5.3.18 The route between Kara Way and Depot Approach is blocked for pedestrians at present by means of a metal palisade fence. The redevelopment of the Application Site as well as the neighbouring Co-op, Bingo and Jewson sites will transform the area to the east of the Railway Terraces from a commercial area to a predominantly residential area. The proposed route through the Application Site would be of benefit to those new residents and would not preclude the opening up of a pedestrian link to Kara Way in the future.
- 5.3.19 Section 10 of the revised TA in March 2021 (CDA.25), and the ATZ assessment appended to that report, provide a quantitative and qualitative assessment of the route through the Proposed Development and the primary routes to and from the Application Site. It demonstrates that the route would meet the requirements of TfL's Healthy Streets approach and would provide a direct and attractive route between Depot Approach and Cricklewood Lane for the Proposed Development and the wider community, including any future development to the west of the Application Site.
- 5.3.20 At paragraph 7.6, the Rule 6 party states that the pedestrian isochrones in the revised TA assume all pedestrians can walk in every direction at the same uniform speed, with no

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<sup>2</sup> Transport for London Road Network





delay at busy roads, and in straight lines across railways and through buildings.

- 5.3.21 The cycle isochrones in the revised TA were based on travel distances in 5-minute increments whereas the pedestrian isochrones were presented as radii. Figure 3.2 of this evidence is a more accurate isochrone plan based on the methodology used in the TfL PTAL assessment.
- 5.3.22 This does slightly alter the area shown to be within 5, 10 and 15 minutes walking distance of the Application Site but does not negate the more detailed and more accurate ATZ assessment or the TA conclusions.
- 5.3.23 The Rule 6 Party also asserts at paragraph 7.6 that the information submitted in support of the Application did not estimate the increased number of pedestrians passing under the Cricklewood Lane bridge. That is incorrect; the ATZ assessment, appended to the revised TA (CDA.25) included a gravity model for all pedestrian movements, including those walking to bus stops and stations. It identified the six primary walking routes to and from the Proposed development and assigned pedestrian trips to each, including the route beneath the railway bridge.
- 5.3.24 The proposed development will deliver improvements to the route beneath the rail bridge in the form of s278 works to the footway and a S106 contribution to enhance the underside of the rail bridge. The Proposed Development will also deliver a new controlled pedestrian crossing over Cricklewood Lane which will represent an improvement in local highway conditions for pedestrians.
- 5.3.25 The Rule 6 party states at paragraph 7.7.1 that the reduction in vehicle trips is calculated as the difference between the predominant through traffic using the car park as a cut-through and the total traffic in and out of the car park. This is incorrect; the detailed traffic survey carried out in 2019 identified that the existing retail uses generate 232 vehicle trips during the morning peak hour and 278 trips during the evening peak hour. As stated at paragraph 3.46 of the revised TA, the traffic survey also specifically identified any traffic using the Application Site car park as a short-cut to avoid the Cricklewood Lane traffic signals. The survey identified 40 drivers cutting through the car park from Depot Approach to Cricklewood lane during the morning peak hour (0800-0900) and 41 during the evening peak (1700-1800). In the reverse direction, the survey only identified 2 or 3 vehicles during the peak hours. This traffic should not be using the car park as a 'rat-run' and would be redirected onto the public highway as a result of the Proposed Development. The Rule 6 party is therefore incorrect to describe the rat running as 'predominant' as the vast majority of existing traffic entering and leaving the Application Site is generated by retail customers.



- 5.3.26 The net change in vehicle trips as a result of the Proposed Development is determined by comparing the observed traffic associated with the existing use of the Application Site, and the predicted traffic associated with the Proposed Development. Technical Note 5 (CDA.29) includes a detailed assessment of the peak hour net change in vehicle trips through the Depot Approach / A5 junction and the Cricklewood Lane / A5 junction. That assessment includes an allowance for any current rat-running traffic being redirected back onto the public highway.
- 5.3.27 Technical Note 5 concludes that the Proposed Development will have an overall beneficial effect on highway capacity and safety and will have no material adverse effects on any individual junction. The Council as local highway authority, and TfL agree the findings of Technical Note 5.
- 5.3.28 The Rule 6 party states at 7.7.2 that the information submitted in support of the Application does not take account of existing B&Q customers seeking other stores further afield. This is a potentially circular argument as many of the existing customers may currently be travelling into Cricklewood from further afield due to the current retail offer. Whereas it may be true that assessment of redevelopment and regeneration on a regional scale results in diverted trips, the revised Transport Assessment and Technical Note 5 are concerned with the local transport network surrounding the Application Site and demonstrate that the Proposed Development will result in a net reduction of 4,229 vehicle trips per day on the local roads in Cricklewood. Of course, the introduction of new homes in a highly accessible area, in close proximity to a wide range of facilities and transport options will reduce the need for those residents to travel, especially by car.
- 5.3.29 The Rule 6 party states at paragraph 7.7.3 that the 'predictions' (assumed to mean vehicle trip predictions) do not use TRICS data for similar sites and state that the Applicant has sought to use the number of parking spaces rather than the number of residents in order to determine predicted vehicle trips.
- 5.3.30 The TRICS® database is the industry standard for determining predicted multi-modal trips associated with proposed developments. The TRICS database was interrogated in accordance with the TRICS Consortium Ltd guidance.
- 5.3.31 As observed vehicle trips were available for the existing use of the Application Site, the baseline multi-modal trips were based on observed vehicle trips combined with TRICS trip rates for all other modes.



- 5.3.32 The residential element of the Proposed Development comprises flats only with no houses or maisonettes. The TRICS selection criteria used in Technical Note 5 (CDA.29) used the sub-categories of *Residential C – Flats Privately Owned*, and *Residential D – Affordable/Local Authority Flats*. The alternative sub-category *Residential M - Mixed Private/Affordable Housing* includes sites which comprise a mix of flats, houses and maisonettes. The TRICS database does allow for those sites which include houses and maisonettes to be excluded from the selection criteria, but this would result in a reduced number of survey sites. The use of sub-categories Residential C and D (flats) provides a higher number of survey sites and allows for a bespoke split between private and affordable dwellings.
- 5.3.33 The default Trip Rate Parameter setting in TRICS is 'Trips per dwelling'. There is no option for trips per resident as suggested by the Rule 6 party. Technical Note 5 (CDA.29) demonstrates that the selected TRICS survey sites, are those that most closely match the Proposed Development in terms of scale, location and accessibility, but all have higher levels of car parking than the Proposed Development and therefore the trip rates per dwelling were converted into trip rates per parking space in order to derive predicted vehicle trips for the Proposed Development. This method provides a more accurate prediction of vehicle trips for a low-car scheme such as the Proposed Development rather than simply applying trip rate per dwelling derived from the TRICS sites with higher parking provision. The resultant vehicle trips in Technical Note 5 are agreed with the Council.
- 5.3.34 In the Officer Report to the Strategic Planning Committee (CDD.03) the Council's Transport Team comments state that the methodology used in TN5 (CDA.29) was "*not a standard process*"; they do not suggest that it was incorrect. Indeed, TN5 makes this very point. The Council's Transport Team agreed that that the earlier assessment of vehicle trips associated with the proposed residential uses was likely to be an **over-estimate** of traffic generation as the TRICS survey sites all had more parking per dwelling than the Proposed Development. As a result, a non-standard form of appraisal was necessary in order to determine the likely traffic effects of the Proposed Development.
- 5.3.35 Nevertheless, as stated in the Committee Report, the Council's Transport Team undertook an independent assessment of vehicle trips for comparison purposes and concluded that the forecast vehicle trips in TN5 were acceptable.



## 5.4 Other

- 5.4.1 Other transport-related third-party objections, not already covered in this section are addressed below.
- 5.4.2 Comment: *Concerns about construction traffic safety on pupils using local roads to get to Hampstead School and several primary schools via the B&Q site.*
- 5.4.3 The Proposed Development is supported by an outline Construction Logistics Plan (CLP), final versions of which will be secured by planning condition and submitted to and approved by the planning and highway authorities prior to commencement on site. The CLP will include (but is not limited to) hours of operation, route management, construction access points, safe working methods to protect pedestrians and cyclists. During construction the site will be protected by hoarding.
- 5.4.4 Comment: *Local bus routes on Cricklewood Lane are to be reduced by the Mayor.*
- 5.4.5 In November 2022, TfL announced that new funding from the Mayor has allowed TfL to reassess its proposals for the bus network and cancel the changes that Londoners were most concerned about. Route 16 will run on route 332 between Brent Park and Paddington. The night route N16 will be renumbered N32; however, previously proposed changes to routes 15, 19, 27, 43, 47, 49, 53, 56, 88, 98, 100, 113, 135, 148, 171, 189, 205, 214, 236, 254, 259, 277, 279, 283, 328, 343, 388, 414, 430, 476, D3, N15, N19, N27, N98, N133, N205, will not be taken forward.



## 6.0 MATTERS NOT IN DISPUTE

### 6.1 Local Highway Authority

6.1.1 The Council as local highway authority does not object to the Proposed Development in terms of the proposed levels of car and cycle parking, or the likely impact on road safety or the capacity of the local road network. The Council consultation response is included in CDB.10.

### 6.2 Transport for London

6.2.1 TfL as strategic transport authority does not object to the Proposed Development in terms of the proposed levels of car and cycle parking, or the likely impact on road safety or the capacity of the wider transport network (CDB.02).

### 6.3 Transport improvements

6.3.1 As Proposed Development includes a range of transport improvements and measures which would be secured by planning condition or S106 obligation. These are explained in detail earlier in Section 3 of the Proof of Evidence, and summarised as follows:

- Residential Travel Plan (RTP) [S106]
- Residential Travel Plan Incentive fund up to £330,000 [S106]
- Commercial Travel Plan (CTP) [S106]
- Improvements to public realm including Cricklewood Green enhancements [S106];
- Land safeguarded so as not to preclude future southern access into Cricklewood Station [S106]
- Contribution towards improvements to the underside of the rail bridge [S106]
- Contribution to upgrade an uncontrolled crossing on Cricklewood Lane to a Puffin crossing [S106]
- New Car Club parking for new residents and wider local community [condition]
- Construction management and Environmental Logistics Plan (CMELP) [condition 5]
- Car Parking Design and Management Plan (CPDMP) [condition 9]
- New pedestrian/cycle routes between Depot Approach and Cricklewood Lane [condition]
- New public realm designed on Healthy Streets principles [condition 29]
- Removal of existing vehicle access from Cricklewood Lane [S278]
- Improve footway between Site and Cricklewood Station [S278]



## **6.4 Transport Statement of Common Ground**

- 6.4.1 The undisputed transport matters between the Applicant and the Council are set out in the Transport Statement of Common Ground (CDI.04).



## 7.0 SUMMARY AND CONCLUSIONS

- 7.1.1 My evidence has considered the effect of the Proposed Development on local transport, with particular regard to sustainable travel, effects on the road network and highway safety, and the amount of parking to be provided.
- 7.1.2 The Application is in outline only with all matters reserved except for access. The matters of layout and landscaping would therefore be determined as part of any reserved matters or full planning applications.
- 7.1.3 The Application Site is very well placed to promote sustainable travel choices. The Application Site has a current PTAL rating of 5 at the front of the site and 4 at the rear; however, the Proposed Development will introduce new direct pedestrian and cycle routes through the site, thereby reducing the distance to the bus stops on Cricklewood Lane and to Cricklewood Station. This will have the effect of increasing the access level at the rear of the site. An audit of existing sustainable transport infrastructure shows that the Application Site is very well located to promote walking and cycling as the preferred modes of travel for shorter journeys.
- 7.1.4 The Application was supported by a Transport Assessment and a three-part Transport Implementation Strategy. Following consultation responses from The Council Transport Team and TfL, a revised Transport Assessment (including an Active Travel Assessment) was submitted in March 2021 and a Traffic Impact Assessment (TN5) was submitted in May 2021.
- 7.1.5 The Council as local highway authority raised no objection to the Proposed Development subject to conditions and obligations. TfL as strategic transport authority raised no objection to the Proposed Development subject to conditions and obligations. LB Camden and LB Brent as neighbouring highway authorities raised no objections on transport grounds.
- 7.1.6 I have demonstrated that the Proposed Development would result in a net reduction in vehicle trips and would therefore have a positive effect on local highway conditions.
- 7.1.7 I have demonstrated that the Proposed Development would deliver an appropriate level of car parking in line with London Plan 2021 policy T6, and that the proposed level of parking would meet the needs of the development and cause no harm to the surrounding highway network.
- 7.1.8 The Proposed Development would deliver a package of transport improvements. The improvements would comprise management procedures to control and regulate the



movement of people and goods to and from the site, contributions and obligations to enhance the transport network and to promote sustainable transport choices, and physical measures to improve the local highway conditions.

- 7.1.9 In accordance with the terms of the Framework, the Application should not be refused on highways or transport grounds. The Proposed Development would accord with the development plan and there are no material transport considerations which outweigh the presumption in favour of granting planning permission.





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# Appendix A

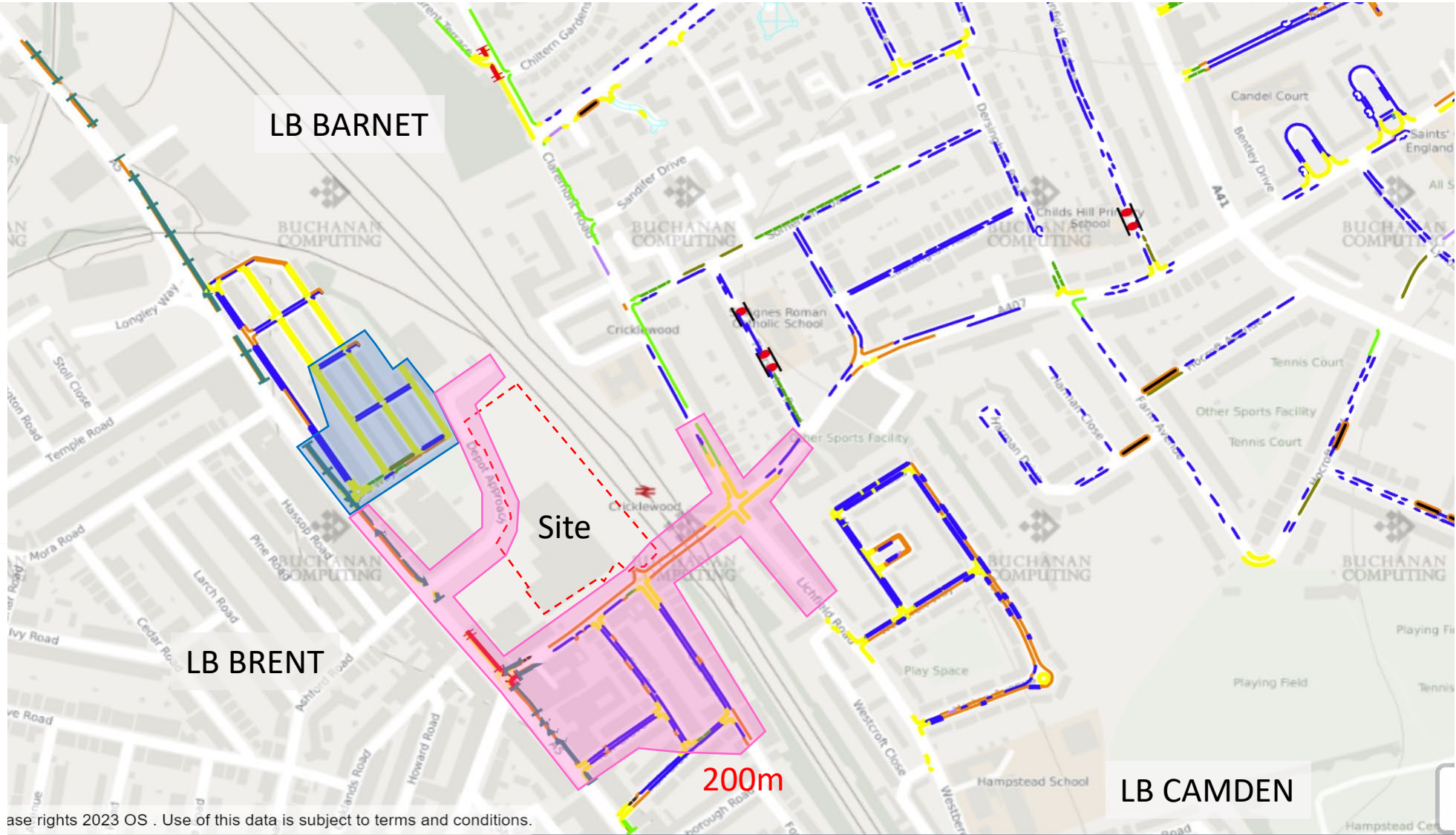
## Controlled Parking Zones

within 200m walking distance of the Application Site

### **APP/3/B**

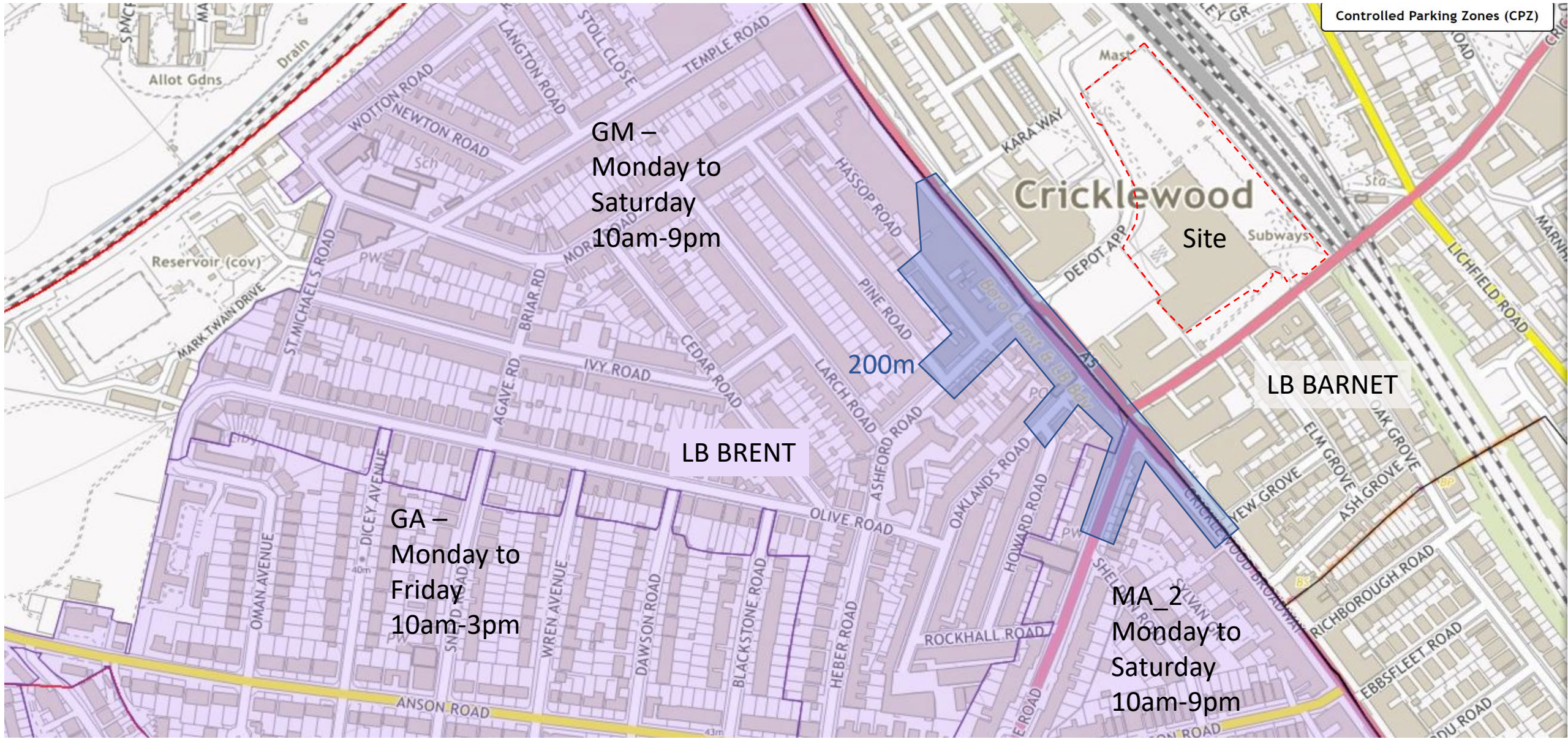
# London Borough of Barnet CPZ

- ✓ No Loading Mon-Fri 4pm-7pm
- ✓ No Loading Mon-Fri 7am-10am
- ✓ No Loading Mon-Fri 7am-10am and 4pm-7pm
- ✓ No Stopping on school entrance markings
- ✓ No loading Mon-Sat 7am-10am and 4pm-7pm
- ✓ No loading Mon-Sat 7am-7pm
- ✓ No loading at any time
- ✓ No loading other
- ✓ No waiting Mon-Fri 11am-12pm
- ✓ No waiting Mon-Fri 2pm-3pm
- ✓ No waiting Mon-Sat 8am-6.30pm
- ✓ No waiting Mon-Sat 9am-5pm
- ✓ No waiting On event days 1pm-6pm
- ✓ No waiting at any time
- ✓ No waiting other
- ✓ Other Bays - Non TMO
- ✓ Payment Parking
- ✓ Pedestrian Zone
- ✓ Permit Holder Bay
- ✓ Permit Parking Area
- ✓ Residents Permit Holders
- ✓ Taxi Rank
- ✓ Unrestricted Bay



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# London Borough of Brent CPZ



# London Borough of Camden CPZ

