

Planning Application 17/8102/FUL: Pentavia Retail Park

This document is a formal response to the proposed development at Pentavia Park from the Barnet Cycling Campaign (BCC, affiliated to the London Cycling Campaign). The response is limited strictly to the proposals in terms of encouraging cycling as laid out in the council's planning brief for the site.

Executive Summary

In terms of the overall assessment, whilst BCC welcomes the inclusion of a significant number of cycle parking spaces in the plans, we object to the plans overall. BCC would like to request the opportunity to address the planning committee to discuss these points in detail.

It is the belief of the Barnet Cycling Campaign that the development in Pentavia Park does not fulfil either the planning brief or the wider aims of Barnet Council and the Mayor of London in terms of cycling. In particular, we can see little evidence of paragraphs 1.2, 1.3, 5.12 and 6.6 being met (please refer to the section Context below).

We also conclude that the Travel Assessment (TA) did not complete the CLoS correctly, and it does not account for the requests of Transport for London (TfL) as stated in the TA. There is no evidence of an Equality Impact Assessment (EqIA), and this is reflected in the CLoS scores and recommendations. Ramps requiring a dismount are unusable by those who are unable to leave the bicycle and walk, such as disabled riders using hand cycles.

With regards to the Mayor's Transport Strategy (MTS), we note that the TA was performed against the 2010 version. It should be understood that scheme as currently designed will be explicitly against the 2017 version. Consequently, it is not likely to help the borough achieve any modal shift towards cycling and might indeed send it the other way. It represents a wasted opportunity for the borough to improve walking and cycling in the area, with the result that more motor vehicles, congestion and pollution will be likely.

Significant work needs to be done in order to make the site viable for cycling. We offer ourselves as consultees on a new set of plans more in line with the planning brief and wider transport strategy.

The remainder of this document provides detail on our assessment.

Context

To provide context for the objections, we note the following from the planning brief:

- *1.2 The objectives for the site are:*
 - *improvements to existing transport infrastructure and creation of new pedestrian and cycle links to Mill Hill Town Centre, Colindale, Mill Hill Park, Copthall and local transport nodes.*
- *1.3 In order to deliver these objectives, the sustainable redevelopment of the Pentavia site presents a number of opportunities. These include:*
 - *new pedestrian and cycle links that contribute to the re-integration of the site with Colindale and Mill Hill.*
- *5.12 Due to the low PTAL rating combined with difficult pedestrian and cycling linkages any future development will need to both improve these access routes*

- 6.6 *The introduction of residential land uses would be subject to demonstrating the ability to provide suitable accessibility for future residents through the creation of new and improved vehicular and transport connections, alongside improvements to cycling and pedestrian access and choice.*
- 7.15 *A full Transport Assessment (TA) will therefore be required to examine the impact of the proposed development and how such impacts will be mitigated. It will therefore need to include a detailed assessment of any new link road/s. The impact of the development on the local road network, as assessed in the TA, should include, and not be restricted to the following junctions:*
 - i. *A41 / Page Street / Hall Lane / A1 / A41 Great North Way (Fiveways Corner);*
 - ii. *A1 / A41 / The Broadway (Mill Hill Circus);*
 - iii. *Bunns Lane / Grahame Park Way;*
 - iv. *Page Street / Pursley Road / Bunns Lane;*
 - v. *Both ends of Flower Lane; and*
 - vi. *Bunns Lane / Hale Lane / The Broadway.*

Travel assessment

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

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

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

- 2) Given the explicit aims of the planning brief to improve cycling links, we believe that the inclusion of cycling within car figures (paragraph 7.7.10 of the TA) is not prudent. We also believe that the claim made in paragraph 7.7.34 accepts the low safety level for cyclists and is evidence of a failure to adhere to the planning brief. This is critical when it is noted that 34.4% of car trips are under 5km (paragraph 14.2.4 of the TA), which could be made by bicycle in less than 20 minutes.
- 3) The TA highlights a consultation comment from TfL that *"TfL considers that a direct pedestrian and cycle access onto Bunn's Lane is necessary for a residential use of the site and should be provided by the developer."*

The response to this comment was *"Pedestrian and cycle access is proposed as part of the Development the effects of which are accounted for in the completed development section of this chapter."*

As the new Bunns Terraces are pedestrian only, there is no proposed direct cycle access to the site from Bunns Lane. Consequently, TfL's comment has not been addressed.

CLoS

As part of the TA, a Cycle Level of Service (CLoS) assessment was undertaken.

- 4) We note that, under the London Cycling Design Standards (LCDS), a CLoS is not required at various stages, however it is recommended to be performed against the existing and planned layouts. The CLoS undertaken by the authors of the 2016 application's TA (Robert West) was against the current layout only, and we recommend that a CLoS is performed against the plans.
- 5) We also note that the LCDS recommends the involvement of stakeholders in assessing cycling infrastructure "at a meaningful time". BCC (and by affiliation LCC) would be considered such a stakeholder, and we note the lack of consultation by the developers during the design phases.

In order to validate the CLoS, BCC undertook two assessments of the site by bike, capturing both photographic and video evidence of the overall current state. We observed the following against each of the links and junctions outlined in the CLoS. Photographs have been provided in this response, and video evidence can be provided on request.

6) Watling Road/Woodcroft Avenue

This route was not ridden as it would not be considered a useful link for cyclists, who would be more likely to travel to Colindale than Burnt Oak. This lack of desirability is reflected in the low score on the CLoS.

7) Bunns Lane

The plans have no cycle access through the Bunns Terraces for cycles. Hence access to Bunns Lane is only possible from the A1 northbound via either the narrow, and steep footpath. Both these options would mean dismounting and risking injury during adverse weather conditions.

Additionally, the path does not present an option for a wide range of bicycles, as they would have to be light and small. Cargo bikes would not be able to use the path, restricting delivery options. The path is also too steep to be walked comfortably for anyone wearing cycling shoes with cleats.

Where access is performed by steps, we recommend an EqIA is performed. Bunns Lane would be an area that would benefit from such an assessment.

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



8) A1 Southbound/A1 Northbound

We note that the scores for each of the directions were identical. Our comments therefore cover both directions, except where highlighted.

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

In order to exit the site and travel south by bicycle, a person will be forced to dismount, reverse the direction and cross both slip roads. The alternative is to proceed to Mill Hill Circus and return on the south bound side. Neither of these options justifies a high directness or coherence score.

The southbound route also suffers from a pedestrian only footbridge, which should further reduce the directness score. Signage indicating that bicycles are not allowed is poor and hidden behind foliage.

Crossing the A1 to the south involves the use of a subway, which is littered with glass and debris. It is not a pleasant environment for riders to use.

Despite being a track separated from the main carriageway, the fact that a cyclist has to traverse two slip roads in order to proceed south means a score of 44 for Safety is too high. The separation is also only a kerb, rather than a verge, which puts the cyclist at risk.

The track on both sides is 1.25m with an effective width of less than 1m in places. It is combined with pedestrians. This would result in lower scores for both safety and comfort.

Access to the site could be performed by converting the existing track, which comes under the A1 and exists near Tithe Walk. This is not possible with the design of Bunns Terraces as proposed.

It should be noted that, where ramps, bridges and subways are concerned, the requirement to dismount prevents those unable to do so from using the crossings. By way of example, those using hand cycles would not be able to access the southbound side cycle track. We recommend an EqlA is performed against the subway and bridges on this section of the network.



9) Grahame Park Way

We welcome the observation under paragraph 1.31 that the mandatory cycle lane on Grahame Park Way was often blocked with cars and cones. We also welcome the recommendation that this lane is enforced.

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

The bridge itself is not suitable to walk up and down with a bicycle in anything other than flat shoes. In adverse weather, it will present an unpleasant route for cyclists, especially with high winds.

As stated earlier, the requirement to dismount on ramps prevents those unable to do so from using the crossings. We recommend an EqIA is performed against the bridge over the M1.

Having traversed the bridge, the rider is presented with the use of the tunnel underneath the train line. This is currently strewn with litter, household goods and glass. The CLoS recommendation that this tunnel be painted does not reflect the true level of the site.

Grahame Park Way also has several commercial sites, including a timber yard, which produce high levels of HGV traffic. Interactions with HGVs are not accounted for in the CLoS.





10) Flower Lane/Station Road/Woodland Way

During our assessments, several cars were observed ignoring the solid white lines on Flower Lane, including one that proceeded to perform a “left-hook”.

The junction with Woodcroft Avenue and Station Road presents both a blind bend and an ice risk in the winter. Additionally, cars were observed overtaking on the blind bend on Woodcroft Avenue.

11) Junction Bunns Lane / Grahame Park Way

This junction suffers from excessive interaction with HGVs from the previously mentioned sites on Grahame Park Way.

12) Junction of Bunns Lane / Woodcroft Avenue

The junction here was observed to be problematic for cyclists. The sightlines for cars leaving Woodcroft Avenue are not sufficient enough to reduce conflict with cyclists.

13) Mill Hill Circus

Mill Hill Circus was not ridden as part of the assessment. It should be noted that the cycle route at this roundabout involves using side roads, including Daws Lane, Victoria Road, Lawrence Street and Uphill Road. Cyclists travelling north are diverted under the A1 at a subway (being forced to dismount). This means that there are significant delays compared to motor vehicles at the junctions, Value of Time would rank low and there is a significant deviation factor. All of these would result in a poor Directness score, which is not reflected in the CLoS score provided.

As stated earlier, the requirement to dismount on ramps prevents those unable to do so from using the crossings. We recommend an EqlA is performed against the subway under the A1.

14) Tithe Walk

During the assessment, a significant number of cars were seen doing u-turns at the junction of Page Street and Tithe Walk. This would present a safety issue and reduce the CLoS score

15) Junction of Bunns Lane / Flower Lane

Our assessment noted no particular issues beyond those mentioned in the CLoS

16) Junction of Bunns Lane / Page Street

The junction here is difficult to traverse. In addition, it should be noted that there are proposals to remodel this junction, including options to remove the double roundabout. The CLoS should be revisited in light of these proposals.

17) Junction of Flower Lane / The Broadway

Our assessment noted no particular issues beyond those mentioned in the CLoS

18) Junction of Page Street / Chapman Way

Our assessment noted no particular issues beyond those mentioned in the CLoS

19) Recommendations

We agree with recommendations (i), (ii), (vii).

We disagree with recommendations (iii) and (iv) in that we do not see this path to be adequate access to Bunns Lane for the reasons provided above. The recommendation does not go far enough.

We disagree with recommendation (v) in that we do not see the path as being in either an adequate condition, or a suitable width for shared use. The recommendation does not go far enough.

We disagree with recommendation (vi) in that the comfort levels of this tunnel and the surrounding areas are not high. The recommendation does not go far enough.