

## London Borough of Barnet

### MILL HILL EAST AAP EXAMINATION IN PUBLIC

#### Hearing Statement prepared by the London Borough of Barnet

##### Hearing Issue 2:

Whether the implications of development on the wider highway network are properly assessed and provided for. In particular, what is the justification for including paragraph 5.8.14?

September 2008

[www.barnet.gov.uk](http://www.barnet.gov.uk)

## Matter 2

### Transport

**Whether the implications of development on the wider highway network are properly assessed and provided for. In particular, what is the justification for including paragraph 5.8.14?**

**Test: 3, 4, 7, 8, and 9**

**Policy: MHE10, MHE11, MHE12 and MHE13**

#### **1. Introduction**

1.1 This statement sets out the Council's response to Hearing Issue 2. It is structured as follows:

1. Evidence Base
2. Assessment of Soundness
3. Recommendation to Inspector

#### **2. Evidence Base**

##### **Policy Guidance**

2.1 PPG 13 Transport (March 2001) outlines the government's aim to promote a reduction in car dependency via transport and planning policies that are integrated at the national, strategic and local level. More recent guidance in 'Manual For Streets' further reinforces this objective to encourage the layout of highway and street design that puts the movement of people and non car uses before vehicular traffic.

2.2 The relevant London Plan Policies are as follows:-

Policy 3C.1 (Integrating transport and development) advocates that the Mayor will work with boroughs to ensure the integration of transport and development by seeking to improve public transport, walking and cycling capacity and accessibility, for areas designated for development and regeneration, including Areas for Intensification in which improved access is needed.

Policy 3C.2 (matching development to transport capacity) states that the boroughs should consider proposals for development in terms of existing transport capacity, and the cumulative impacts of development on transport requirements should be taken into account. Developments with significant transport implications should include a Transport Assessment and Travel Plan.

Policy 3C.3 (Sustainable transport in London) states that the Mayor and strategic partners should support measures that encourage shifts to more sustainable modes and appropriate demand management.

Policy 3C.4 (land for transport) states that the boroughs should ensure the provision of sufficient land and appropriately located sites for the development of an expanded transport function to serve the economic, social and environmental needs of London.

- 2.3 At a local level the adopted UDP, the Council's Strategic Movement policies state:-

**Policy GNonCar – Sustainable Transport**

The council will encourage the use of more sustainable modes of travel such as public transport, cycling or walking.

**Policy GRoadNet – Road Network**

The council will seek to ensure that roads within the borough are used appropriately according to their status in the defined road hierarchy.

- 2.4 There are also policies on promoting Travel Plans (M3), encouraging public transport through development opportunities (M6), supporting road schemes as part of an integrated public transport system (M9) and providing parking standards in new development in accordance with the London Plan – with the exception of residential developments where a modified local policy applies (M14).

### **3. Assessment of Soundness**

- 3.1 The AAP's provisions for transport are provided in Policy MHE10, MHE11, MHE12 and MHE13.
- 3.2 The soundness of the above policy needs to be tested against tests 3, 4, 7, 8 and 9. Tests 1, 2, 6 and 5 are not considered applicable to this hearing issue.

### **3.3 Test 3: The DPD has been subject to a Sustainability Appraisal**

A sustainability Assessment is a specific document which tests the AAP against a set of sustainability criteria.

Sustainability considerations form part of the Borough's evidence base and assesses the predicted effects of transport impacts on the social, environmental and economic objectives. A sustainability appraisal was an on-going assessment throughout the preparation of the transport policies including the promotion of reduced car use and alternatives to vehicular transport and in the Council's opinion provides a sound assessment on the predicted effects of the AAP. The SA concluded that improvements to public transport and promotion of walking and cycling connections are inherent in the AAP, new development could provide the infrastructure required for car clubs and wider strategic measures such as improved underground services could be considered (although the SA recognised that this may be outside of the scope of the AAP).

As a result the Council consider that the transport proposals comply with the requirements of test 3 and are therefore sound.

**3.4 Test 4: The Development Plan Documents (DPD's) is a spatial plan which is consistent with national policy and in general conformity with the London Plan. It has properly had regard to any other relevant plans, policies and strategies to the area or adjoining areas.**

The Council considers that Policies MHE10 to 13 set out a balanced set of transport proposals including promoting walking, cycling, public transport, travel plans, car sharing / car clubs, appropriate car parking standards and highway improvements that mitigate the impact of the development, and are therefore consistent with PPG13, and with London Plan policies 3C1 to 3.

In terms of 3C1 the AAP sets the context to ensure that scheme will fully integrate the transport with the envisaged developments. For 3C2 there has been a detailed assessment of movement capacity undertaken to ensure that the proposed development can be accommodated. In relation to 3C3 it is proposed that a full range of sustainable modes of transport will be provided through the AAP.

Policy MHE10 clearly states that street design will follow Manual for Streets guidance, MHE12 is in accordance with UDP policy M6, and MHE13 with UDP policies M3 and M14.

LB Barnet's UDP (7.3.31) recognises that The *London Plan* seeks to ensure that on-site car parking at new developments is the minimum necessary, as it is considered that over-provision can undermine the use of more sustainable, non-car transport modes. The London Plan sets out a parking restraints policy that balances the desirability of reducing car use with the need to provide for attractive, viable town centres. It recognises that many people will continue to use their car for travel, particularly in the suburbs. In the most accessible locations there could be car-free development but less restrictive policies will generally be appropriate in suburban London. Appropriate parking for disabled people should always be provided and provision should also be made for bicycle and motorcycle parking. This is reflected in the AAP by Policy MHE13

In strategic terms Policy M1 (Transport Accessibility) of the UDP states: The council will expect major development proposals with the potential for significant trip generation to be in locations which are, or will be made, highly accessible by a range of modes of transport, in particular public transport, walking and cycling. In assessing the suitability of such proposals, the council will make reference to established accessibility models and further refinements in consultation with strategic authorities.

Any planning application for the site will be determined in accordance with national guidance, the policies set out in the London Plan, including Policy 3C1 Annex 4 – Parking Standards which provides guidance on parking provision and will be the subject of further detailed testing.

It is therefore considered that the AAP as submitted is in accordance with national guidance and in general conformity with the London Plan. On this basis the Council consider the AAP complies with the requirements of Test 4 and is sound.

### **3.5 Test 7: The strategies/ policies/ allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base**

The Transport Policies and Proposals, as contained in the AAP Framework Document, are the result of a structured and systematic approach to gathering information on local transport conditions and local highway issues in order to understand the capacity of the site and assess the potential impacts that may arise from the AAP development. The process comprised gathering initial base (existing) data collection and comparing that with traffic generation based on the development quantum of 2,000 new homes and other elements of the proposed development such as the school, retail and employment facilities.

The Council commissioned Consultants to undertake modelling work using sound methodologies, which tested various future highway scenarios. These have included looking at partial signalisation of Holders Hill Circus and traffic signals at the Frith Lane / Bittacy Hill junction.

The Consultants undertook work in 2007, producing a detailed local model validation report in July and then a 'Top Down' Assessment report in August 2007. The methodology incorporated within the Top Down report was endorsed by Transport for London (TfL). The numbers output from the assessment were then used to test a variety of proposed highway layouts which were reported in the VISSIM scheme modelling report, produced in October 2007. A Non-Technical Summary Report (contained within the Mill Hill east baseline report) was produced in July 2007 which was an interim summary of the work undertaken up to that point. The ViSSIM model allowed the are wide highway impacts of the development to be tested.

As a result of this testing an east-west route across the site is seen as essential to improve public transport permeability. A secondary but equally important aim is to reduce congestion, efficiently distribute local traffic and limit the impact on the existing road network, in particular to reduce pressure on the Frith Lane / Bittacy Hill and Holders Hill Circus area, which experiences congestion at peak times. Figure 5.6 in the AAP indicates this as an area of 'potential highway improvement'. The other area is an indicative alignment in the vicinity of Sanders Lane. It should be noted that the Council consider that this latter element is not integral to the redevelopment of the AAP area or necessary for the highway network to accommodate the AAP proposals, however in locating the western end of the main street on Bittacy Hill opposite Sanders Lane it maximises opportunities that may be provided if Sanders Lane is re-opened to traffic. Namely this would open up a strategic opportunity for orbital movement between the public transport facilities at North Finchley

and the western area of the borough where many of the boroughs regeneration/new community development is located. In particular it is considered to be particularly important in terms of improving the future bus network and service provision between the east and west of the borough.

The location of the east-west route within the site therefore seeks to provide the optimum accessibility to the local network and existing (and potential future) strategic road network, as well as providing, in conjunction with the High Street, the best access to the main roads for the highest number of people. This includes providing connections to the public transport interchange at Mill Hill East Station, the adjacent foodstore and community facilities. The east-west route would be designed to ensure that the impact of traffic through the development is managed with an emphasis on ensuring high quality streets are created.

### Sanders Lane Link Proposal

As set out in the Schedule of Changes it is recommended that paragraph 5.8.14 is amended to say that the Sanders Lane link 'may' be reopened to improve borough wide east west movement.

The 2004 Traffic management Act has recently placed new responsibilities on all highway authorities, who are now tasked with investigating and progressing measures to relieve movement pressures on the public highway network. In Barnet part of this work has focused on the feasibility of re-opening an original public highway along Sanders lane. The Council is currently considering the feasibility of the scheme for the strategic reasons stated previously, as the proposed link would provide an enhanced east-west route than via Holders Hill Circus. However, it is important to state that any proposal for re-opening Sanders Lane would be subject to extensive public engagement, including various statutory processes. The Highway Statement from A.F. MacDonald (AFM) claims that there are various insurmountable problems with the re-opening. Although a number of issues are highlighted the Council consider that none are matters which cannot be addressed through careful design. The re-opening of Sanders Lane currently has no formal status, and is not being sought as part of the AAP. However, it is considered appropriate given the proposed 10 year lifespan of the plan that the possibility is referred to at this time.

The re-opening was not shown on the three original option layouts at issues and options stage, as the reopening of Sanders Lane was not being considered at the time. The re-opening was not recommended in the Consultants October 2007 Modelling Report as it was considered that the AAP development could be best mitigated by improvements to Frith Lane / Bittacy Hill and Holders Hill Circus junctions.

The VISSIM Modelling Report concluded that some form of off-site highways improvements would be required, in addition to the provision of a new east-west route through the site. The report indicated that these improvements could take the form of either partial signalisation of the Holders Hill Circus Gyratory and of Frith Lane/Bittacy Hill or the re-opening of Sanders Lane as a

through route. There was no requirement to do both and, on balance, the Council considered that the improvement of the existing junctions was preferable because it partly allowed the incorporation of improved pedestrian facilities at key locations.

### Engel Park

The Highway Statement from AFM suggests an alternative east-west route located north of the one in the AAP and linking with Bittacy Hill close to Engel Park. However, the Council would wish to limit the increase in traffic using Engel Park and Bittacy Rise, both of which are steeply inclined, and together have a greater number of residential frontages (over 250) than the Sanders Lane proposal (approx. 40). Furthermore, the council consider that Engle Park and Bittacy Rise would not be appropriate or suitable for design criteria referred to by AFM (in TA 79/99 of the Design Manual for Roads & Bridges).

In strategic terms an east-west link through the northern fringe of the site provides a less direct route than that proposed in the AAP, should Sanders Lane re-open in the future. Furthermore, the Council consider that a re-opened Sanders Lane would provide more relief to parallel routes such as Devonshire Road than Engle Park/Bittacy Rise.

### Safe Access

The Highway Statement from AFM claims that the transport proposals are deficient in that there is little detailed design of junction or internal highway layout within the AAP Development Framework. However, the remit of the AAP is to test capacity and provide the framework for any future planning applications at the site. The appropriate framework for this is set out in Policy MHE11. The Council do not consider it appropriate at this stage to specify what would be the most appropriate form of highway design as this will be determined by further detailed testing, design and safety audit once the final form of development has been confirmed. It will also be appropriate at this stage to reassess the number of accesses onto the public highway and their locations. It should be noted that the Council is fully supportive of the Government's road safety strategy, has met the 'slight' casualty reduction target for 2010 and is on course to achieve the target for killed and seriously injured.

### Public Transport

The Highway Statement from AFM sets out a number of concerns about public transport and public transport accessibility. It should be noted that maximising the opportunities for access to public transport is a key element in the Council's desire to make the site sustainable and reduce the reliance on the car. The AAP sets the context for improving public transport as per the policies of the London Plan and the UDP. No detailed Travel Plan targets have been set at this stage as these will be attached to individual

development applications. The AAP provides the opportunity to enhance the public transport interchange but limited funding is available from TfL for works at present. In terms of bus routes it is not envisaged that there needs to be any completely new services but that existing services could be suitably modified. The AAP has been developed in consultation with TfL with the purpose of designing an appropriate new route to accommodate east-west bus movements through the site. This has the potential to include the re-routing or extension of one or more bus services through the site, provide links to over ground rail at Mill Hill Broadway and increase site PTAL levels (para 5.8.16).

Regarding the PTAL assessment this has not considered gradient (the TfL guidelines for the calculation of PTAL do not indicate that gradient should be taken into account). However, it should be noted that it is proposed that the lower density housing will be towards the higher northern part of the site, where car ownership will be greater and propensity to use bus lower, whereas the opposite will apply to the southern end of the site. In this context it is considered that the Main Street and High Street that would be used by buses are appropriately located.

### Traffic Patterns

The Highway Statement from AFM expresses concern about the level of traffic flows on Partingdale Lane, which was closed when the highway models were being developed, but has since reopened. It should be noted that much of the traffic using Partingdale Lane in the future year traffic models is north west to north east (or vice-versa traffic), which the Council consider would continue to use the Lane even if the east-west route was located towards the north of the site. Furthermore, the highway model will be reviewed and updated as part of the Transport Assessment that would accompany any future Planning Applications.

### Trip Generation

The Highway Statement from AFM raises issues with various aspects of the trip generation. A 'Top Down' assessment was undertaken using a 'first principles' approach for a number of reasons. TfL Guidance has been utilised, and this does not say London Area Transport Surveys (LATS) cannot be used. Additionally the approach was reviewed and approved by TfL and utilises LATS rather than other trip generation databases (TRICS and TRAVL) as the information from the latter two databases was judged to not yield realistic estimates, due to there being a lack of suitable sites that reflected the intended nature of the proposed development at Mill Hill East. The assumptions made about residential, employment and education trips are considered to be robust. For example, for employment trips it was assumed that 100% arrived between 08.00 and 09.00 and similarly 100% departed between 17.00 and 18.00, clearly a 'worst case' position. For education trips the Council has a very detailed analysis available which was much better than LATS data, and was therefore utilised.

### **3.6 Test 8: There are clear mechanisms for implementing and monitoring**

In addition to the indicators set out in the Sustainability Framework, Matrix 7.1 of the AAP provides a monitoring framework which will be included within the Annual Monitoring Report on LDF Document. On this basis the Council consider that the AAP complies with the requirements of Test 8 and is sound.

### **3.7 Test 9: The DPD is reasonably flexible to enable it to deal with changing circumstances.**

The current highway options are purposely flexible in that only the two primary routes are indicated as the Council consider that the detailed highway layout will depend upon the quantum and form of the development proposed. The AAP requires the submission of detail parking and highway layouts for the site as part of any planning application. These will be the subject of further detailed testing and a full Transport Assessment. At that time, the Council will be able to determine whether the applications incorporate the flexibility and meet the objectives of the site.

## **4. Recommendation to the Inspector**

That the AAP is sound in its submitted form.

Planning Policy Guidance Note 13: Transport (PPG13)

<http://www.communities.gov.uk/publications/planningandbuilding/ppg13>

The London Plan; Spatial Development strategy for Greater London, Consolidated with Alterations since 2004 (2008)

<http://www.london.gov.uk/mayor/strategies/sds/index.jsp>

Manual for Streets, 2007

[www.manualforstreets.org.uk](http://www.manualforstreets.org.uk)

London Borough of Barnet Unitary Development Plan (UDP), 2006

[www.barnet.gov.uk/statutory-development-plans](http://www.barnet.gov.uk/statutory-development-plans)

Traffic Management Act 2004

[http://www.opsi.gov.uk/acts/acts2004/ukpga\\_20040018\\_en\\_1](http://www.opsi.gov.uk/acts/acts2004/ukpga_20040018_en_1)

TA 79/99 Design Manual for Roads and Bridges

[www.standardsforhighways.co.uk/dmrb/vol5/section1](http://www.standardsforhighways.co.uk/dmrb/vol5/section1)

Mill Hill East Area Action Plan, Baseline Report

[www.barnet.gov.uk/planning-consultations](http://www.barnet.gov.uk/planning-consultations)

### **Appendix 2**

#### **Top Down Assessment, August 2007**

### **Appendix 3**

#### **VISSIM Model**

Appendix 2 and 3 are large technical documents which are available for inspection at Planning Reception at North London Business Park, Oakleigh Road South, London, N11 1NP. Hard copies of the appendices are available through the Programme Office (020 8359 7298).