

**APPENDIX 3**

**CONSULTATION RESPONSES**

**First Consultation Responses for Consultation Period Ending 18/12/2014**

Resident Response	Officer Comments
No objections or comments were received by residents during this initial consultation period	

**Second Consultation Responses for Consultation Period Ending 03/08/2015**

Resident Responses:	Officer Comments
<p><b><u>Resident 1 Response:</u></b></p> <p>To improve the traffic impacts in the area a priority bus route across the railway and running West to East through the middle of the development needs to be created. The road should be situated half way between the North Circular and Cricklewood Lane; this would create a more practical and circumferential route.</p> <p>The submitted documents states there is no space or capacity in the area for more road traffic and congestion is probably limiting traffic growth; the developers should think outside the box and consider other options to increase the comfortable movement and invest in long term needs.</p>	<p>Two Reserved Matters Applications and the A5 Corridor Study condition 2.7 of the Section 73 approved application (14/07402/CON) are before this Planning Committee for consideration; and this particular submission specially relates to the A5 Corridor Study; Condition 2.7. Whilst the objection letter refers to both the Infrastructure RMA and the A5 Corridor Study condition 2.7 planning references, officer comments can be found under Appendix 6 in the committee report for the Infrastructure RMA (15/03315/RMA).</p>

<p><b><u>Resident 2 Response:</u></b></p> <p>The Cricklewood part of the Edgware Road is already heavily congested and will be unable to cope with the massive increase in traffic generated by the proposed development. The results estimated does not give confidence that the A5 will be able to deal with the proposed changed in traffic.</p>	<p>The A5 Corridor Study recognises that congestion on the network is a problem. Where practicable, the aim has been to both protect buses from congestion, and encourage walking and cycling through positive design measures. The increase in traffic flow and change in journey time on the A5 corridor has been quantified and improvements are proposed at the traffic signal junctions on Edgware Road between Staples Corner and the A5/A407 junction to help mitigate the impact of the development</p>
<p><b><u>Resident 3 Response:</u></b></p> <p>The roads currently are already heavily congested and at certain times of the day the traffic is standstill causing dangerous levels of pollution. Any development designed will increase the pollution or attract higher number of visitors to Brent Cross; which will have a negative impact to the area.</p>	<p>Two Reserved Matters Applications and the A5 Corridor Study condition 2.7 of the Section 73 approved application (14/07402/CON) are before this Planning Committee for consideration; and this particular submission specially relates to the A5 Corridor Study; Condition 2.7. Whilst the objection letter refers to both the Infrastructure RMA and the A5 Corridor Study condition 2.7 planning references, officer comments can be found under Appendix 6 in the committee report for the Infrastructure RMA (15/03315/RMA).</p>
<p><b><u>Resident 4 Response:</u></b></p> <p>The Junctions at Claremont, Cricklewood Lane and Lichfield Road are currently very busy and difficult to navigate. When this junction gets busy it impacts the junction of Chichele Road, Cricklewood Broadway and Cricklewood Lane. Are there any proposals to improve these junctions?</p>	<p>These junctions are both proposed to be improved as part of phase 1A North. The schemes themselves have already received planning approval as they are 2 of the key gateway junctions to the BXC development, approved as part of the outline permission.</p>

**Resident 5 Response:**

There is no clarity whether the traffic impacts of the surrounding regeneration developments (West Hendon and A2 Dominion) have been taken into consideration.

Existing traffic saturations have not been taken into consideration. Only the calculated baseline traffic; presuming with all the surrounding developments has been predicted. A comparison of queue lengths and journey times is essential.

The visual report does not correlate with actual experiences of travelling on the A5; including significant delays to buses in the PM peak.

We are not certain where Kara road is where there is unused cycle provision.

Increases of 2-3% in saturation are considered insignificant, but such an increase on a road 95% saturated increases the risk of melt down by 100%. The congestion on the network will impact the buses, and these journey times need improving.

Traffic from committed developments i.e. those with full planning consent in the study area have been included within the modelling based on their predicted trip generation at the point of planning permission. The London Transport Studies model also includes background growth of the existing traffic (which takes into account potential development without planning permission) and the predicted traffic from the proposed development.

The traffic model has been validated by comparing the traffic flows and journey times calculated by the model with traffic flows and journey times recorded on street. This process was fully scrutinised by TfL and Barnet. Queue lengths actually provide a fairly unreliable way of assessing the performance of a network as they are constantly changing so the analysis looks at the ability of junctions to allow the demand traffic to pass through the junction, and this is the best indicator of congestion. Separate analysis has been undertaken to make sure that the queues are unlikely to block back to upstream junctions.

As part of the stage 3 base year validation process, the AM, PM and Saturday VISSIM models were validated in accordance with TfL VMAP validation criteria, which modelled journey times for 85% or more of the routes were within 15% or 60 seconds of observed data. The model successfully demonstrated this at VMAP stage. Bus journey times form part of the on-going monitoring.

This should read Kara Way. The developer is only required to provide mitigation of impacts of the development; this does not require them to solve existing traffic issues within Barnet or the adjacent boroughs.

These small predicted increases are regarded as insignificant because the forecasting methods are not accurate enough for these very small changes to be reliable. Where the predicted changes are so small it is just as likely that there will actually be a reduction in traffic flow at these junctions.

Junctions in the vicinity of the scheme where the flow to capacity ratio is greater or equal to 90% in the 'with development' scenario and less than 90% in the 'without

<p>The mitigations included in the outline approval seem to be renegotiable. The A5 Corridor study submitted states that there is some unresolved traffic jam which will have to be resolved at Barnet Councils expense. Can you clarify this?</p> <p>It is proposed the New Railway Station was a planning gain and would only be built when the developer have sufficient revenue to justify. It is not proposed to bring new station works forward, which will be funded by the Central Government and not the developer.</p> <p>What is the turnaround for each bus stop and how many buses need to stop at each location at one time? This information has not been provided and will this be available?</p> <p>There is no drop off proposed for Cricklewood station and why has this been excluded? The outline application stated that there would be step free access for Cricklewood Station; has this been withdrawn?</p> <p>Widths of pavements are a concern particularly if the bus stops are to cope with huge crowds of people</p>	<p>development' are identified as having a material impact and have then been reviewed in detail. Journey times of buses with and without the development have been assessed in the VISSIM micro simulation model.</p> <p>The Developer is only responsible for mitigating all impacts arising from the BXC Development, transport networks will operate in the same manner as that which would have occurred had the Development not been provided. The developer is contributing funding to improve capacity at junctions which exceed 90% due to the proposed development.</p> <p>Works regarding the railway station is not part of this A5 Corridor study planning application.</p> <p>A review of the bus services formed part of the Transport Assessment (BXC05) for the original consent and the S106 Agreement includes provision of a substantial bus subsidy for TfL to use to provide the additional bus services required to satisfy the forecast passenger demand on each existing and new routes. As stated beforehand, Bus journey times form part of the on-going monitoring.</p> <p>Works to Cricklewood Station are not part of this Phase 1a North RMA submission, and will be established in a future phase.</p> <p>There are bus stops immediately adjacent to Cricklewood Railway Station which serve the Scheduled Bus Services. These bus services were found by TfL to provide the necessary capacity and frequency to satisfy all forecast demand for passengers wishing to transfer to the rail mode at this station.</p>
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<p>Servicing and delivery has not been adequately solved in this application.</p> <p>Housing still being shown on the plans in front of B&amp;Q where roadside servicing is indicated in the outline approval.</p> <p>The A5 Corridor study should have outlined how traffic would be monitored through the development programme; to confirm the level of modal shift that would occur and how it would be adjusted. These aspects have not been taken into consideration.</p>	<p>Servicing and delivery for the proposed development is taken into account via a separate Framework Servicing and Delivery Strategy report prepared in accordance to condition 1.21.</p> <p>This proposal does not form part of Phase 1A North nor part of this current applicant. It will be considered at a later date when this plot comes forward in a future phase.</p> <p>There is a requirement under Condition 37.8 for a separate Monitoring Strategy Report which must be submitted and approved prior to commencement of any part of the Development.</p>
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## Other Interest Groups Consultation Responses

	Officer Comments
<p><b><u>Interest Group 1:</u></b></p> <p>Concerns have been raised that the documents included in the current application for the A5 Corridor Study is not the same study as what was approved by the Planning Committee in November 2009</p> <p>Residents have raised concerns that the 1996 Brent Cross Planning application was rejected by the High Court in 2002; and as a result the London Borough of Barnet has encouraged a private-sector Brent Cross Master plan and there has been no community involvement.</p> <p>Have the 'Eastern Lands' been added, and the incinerator site been moved slightly further away from the Railway Cottages?</p> <p>Earlier designs illustrated the two Brent Terrace Triangles as green open spaces. By the time of the 'Brent Cross Supplementary Planning Guidance" (SPG) was prepared, the two triangles had designed to be residential land. Was the SPG written in order to meet the requirements of the Master plan?</p> <p>Attempts were made by members of the public to introduce wider transport issues at the time of the SPG, but they were rejected by the authority.</p>	<p>The A5 Corridor study is a Pre RMA condition attached the Section 73 approval, and was prepare after this planning approval. This Study informs whether there are any forecast traffic impacts that are significant on the local roads. The developer has committed to fund any necessary supplementary measures to mitigate any such significant local traffic impacts.</p> <p>This concern is noted and is not relevant to this current Planning Application.</p> <p>This proposal does not form part of Phase 1A North nor part of this current applicant. It will be considered at a later date when this plot comes forward in a future phase.</p> <p>This concern is noted and is not relevant to this current Planning Application. Please note that the Brent Terrace Triangles Plots 53 &amp; 54 has already been determined.</p> <p>This concern is noted and is not relevant to this current Planning Application.</p>

<p>Public consultation conducted in 2007 and onwards by developers in “caravans” was run solely by staff from a PR company with no planning knowledge.</p> <p>In the November 2009 planning committee it was stated that Brent Council had no objections to the Planning Application.</p> <p>Why was the A5 Corridor study only a 14 day consultation period?</p> <p>Could you supply an audit of the A5 Corridor Study from 2009 to date?</p>	<p>Please see above</p> <p>Brent Council did raise objections and these were recorded in the committee report presented at the 18 and 19 November 2009 Planning and Environment Committee.</p> <p>Consultation time periods comply with the statutory requirements. Please see the main report for further details.</p> <p>The A5 Corridor Study Report satisfies the requirements of the S106 Agreement and has been developed in consultation with the London Borough of Barnet and Transport for London and based on the agreed ‘Scope of Application documents for the A5 Corridor Study’ Revision 06, dated October 2013 (doc No. 47065005/TP/RPT/009). The study has gone through the following iterations in its formulation; to ensure that officers from the London Borough of Barnet and Transport for London are satisfied that the study meets the condition imposed:</p> <p>Revision 1: 10<sup>th</sup> October 2014  Revision 2: 5<sup>th</sup> November 2014  Revision 3: 2<sup>nd</sup> April 2015  Revision 4: 24<sup>th</sup> April 2015  Revision 5: 7<sup>th</sup> May 2015  Revision 6: 26<sup>th</sup> June 2015  Revision 7: 17<sup>th</sup> July 2015.</p>
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## Statutory Bodies and Neighbouring Boroughs Consultation Responses

### Highways England

Email from Stephen Hall, Asset Manager, Highways England dated 28th July 2015.

No objection to the proposals.

### TfL

Letter dated 19th January 2015

Made various comments in relation to modelling, transport improvements, bus journey time assessments, VISSIM, bus priority measures, bus service delays, loading and kerbside parking, urban realm, cycle measures. They concluded at that time that the A5 Corridor study is not to TfL's satisfaction.

Letter dated 1<sup>st</sup> September 2015 (following consultation on updated information in July 2015)

Confirm that TfL are satisfied with the A5 Corridor Study and no objection to the application.

### LB Brent

Letter of Objection from the London Borough of Brent dated 9th January 2015

Brent Council wishes to strongly object to this application seeking to discharge condition 2.7 (A5 Corridor Study) of S73 planning application ref: F/04687/13 dated 23/07/2014 for the following reasons:

The report does not provide confidence that the BXC development will not result in a strongly adverse impact on the local and strategic road networks. Mitigation measures proposed are limited and no evidence appears to be provided that they will be sufficient, in fact the modelling outputs provided appear to suggest that they will not be. The following points need to be addressed urgently:

- The high Degree of Saturation measure used to assess junctions. This needs to be lower.
- The lack of mitigation measures proposed for junctions within Brent that will be directly affected by the development. As a minimum some contribution to mitigation is expected.
- The apparent lack of mitigation proposed for the A5 itself, particularly given the evidence suggesting that the A407 Cricklewood Lane/Claremont Road/Lichfield Road junction will be operating far over capacity in the end state.
- Parking management needs to be discussed urgently with Brent Borough Council.
- More robust walking and cycling measures need to be provided if the modelling is to rely on these to mitigate traffic growth due to development.
- The increased bus journey times need to be addressed.
- The modelling outputs need to be provided in a format which is readily interpreted and which therefore provides confidence in the modelling process.
- The VISSIM modelling needs to be completed.

#### Letter of Objection from the London Borough of Brent dated 14th August 2015

Confirmed that following the objections raised by Brent in January 2015 and those raised by other organisations some changes have been made to the document. It is considered that the following issues have been resolved:

- The increased bus journey times have been addressed within the new VISSIM modelling and are no longer significant once background increases in congestion have been accounted for. The impact on Brent residents will therefore be minimal.
- The modelling outputs have been provided in a format which can be interpreted and completion of the VISSIM modelling provides some confidence in the modelling process. There is therefore less concern regarding potential impacts that may have been missed.
- The VISSIM modelling has now been completed to stage 4+ and signed off by Transport for London.

However, the main concerns of Brent have not been addressed. These are as follows:

- The lack of mitigation measures proposed for junctions within Brent that will be directly affected by the development. The A5CS proposes mitigation only for those junctions that operate at below 90% saturation pre-development and above 90% capacity post development. Within Brent the junctions that fulfil this criteria are Chichele Road/Anson Road and High Road/Walm Lane, and some mitigation for these has been proposed. However, this methodology results in some junctions which are already over 90% capacity receiving no mitigation, even if considerable increases in the degree of saturation are predicted. This is particularly concerning given the 7.5% increase in saturation at the junction of Lydford Road and Willesden Road, suggesting that this junction will be materially impacted to the detriment of local traffic flow with no prospect of mitigation. Brent Council continues to object to this methodology and the lack of proposed mitigation where impacts are apparent.

**Officer Response:** *The 90% measure was agreed by Transport for London and is within the agreed scoping documents for the study.*

*A £300,000 fund towards future Supplementary Transport Measures within Brent and Camden has been agreed with the Brent Cross Development Partners (letter dated 2<sup>nd</sup> September 2015).*

- The lack of mitigation proposed for the A5 itself, particularly given the evidence suggesting that the A407 Cricklewood Lane/Claremont Road/Lichfield Road junction will be operating far over capacity in the end state. Some works are proposed here, however the junction appears to still be very close to capacity in the end state scenario. We would require further measures at this location.

**Officer Response:** *The A407 Cricklewood Lane/Claremont Road/Lichfield Road junction is a gateway junction with a previously approved junction design. Forecast SATURN flows for 2031 indicate the following traffic flow increases from 2021:*

*AM peak – from 2,428 to 2,737 (increase of 13%)*

*PM peak – from 2,456 to 2,466 (an increase of less than 1%)*

*Saturday peak – from 2,290 to 2,414 (increase of 5%)*

*The maximum degrees of saturation in 2031 are 113%, 124% and 111% in the AM, PM and Saturday peaks.*

*The deployment of SCOOT will reduce delay at this junction and further opportunities to optimise performance will be discussed with TfL during the detailed design of this junction.*

*Mitigation for the A5 is summarised in Tables 5.1 – 5.3 of this report and includes improvements at multiple junctions.*

- There has been considerable discussion regarding the need to ensure Brent residents are not unduly impacted by overspill parking or construction worker parking. It has been pointed out that the monitoring regime suggested is not sufficient and that a CPZ in the Dollis Hill area will likely be required during construction, with the CPZ in place prior to works starting. Though we have had verbal agreement to address this, the offer in the document does not provide adequate certainty and we require a separate written undertaking to be provided if the study is not changed. Due to this lack of certainty, our objection to the document on this continues to stand.

**Officer Response:** *The funding of new or extended Controlled Parking Zones in Brent is available through the Consolidated Transport Fund and would need to be applied for either through the Transport Advisory Group or by the London Borough of Brent directly to the Transport Strategy Group (London Borough of Barnet and TfL). The Transport Strategy Group is required to take account of the Transport Advisory Group's recommendations. The requirement for Controlled Parking Zones within Brent has been raised and discussed at the Transport Advisory Group and the need for provision within the Dollis Hill area outside the scheme boundary has been agreed between Brent and the developer (as this is outwith the Section 106).*

- Walking and cycling measures are mostly contained within the AWWCS, however this forms an element of the A5CS. The comments and proposals made by Brent have not been taken forward and this needs to be addressed.

**Officer Response:** *The extent of walking and cycling provision to and from the development is a combination of measures detailed within the A5 Corridor Study, the Area Wide Walking and Cycling Strategy and the Phase 1A North Pedestrian and Cycle Strategy. Modal split target figures are set for the development at each phase with the Transport Advisory Group of which the London Borough of Brent are a member, reviewing any failure to meet such targets.*

*With the exception of cycle parking near Keyes Road, which scored as green (good), all cycling provision was rated as amber (average).*

*The improvements put forward are with a view to increase the Pedestrian Environment Review System and the Cycling Environment Review System scores of the A5 links and to improve conditions for pedestrians and cyclists heading through the junctions. The suggested improvements are initial proposals that are subject to feasibility and detailed design at a later stage.*

*These improvements would offer an improved cycle environment over the current situation, and are considered to be appropriate when the requirements of other modes along this corridor are considered.*

## **LB Camden**

### **Email of Objection from the London Borough of Camden dated 6th January 2015**

The London Borough of Camden object on the following grounds:

- The A5 corridor study does not address impacts in Camden and despite reference being made to Camden, this is not in context of the vehicle impacts but appears to be only be in context of pedestrians and cyclists.

*Wording: Ensure that any local traffic impacts are identified in the adjacent boroughs of Brent and Camden, as well as any further impacts in the LB of Barnet by ensuring that the traffic modelling for the design stage is sufficiently detailed in areas of interest, e.g. the Dollis Hill area and south of Cricklewood Lane. The A5 corridor study as presented seems to miss the point of this statement as very little evidence has been presented that Camden can assess to understand the impact south of the borough boundary.*

**Officer Response:** *The A5 Corridor Study does assess local traffic impacts including those on roads in Camden.*

*Use of the SATURN model has enabled changes in traffic flow on local roads in Brent and Camden to be assessed. The difference in total flows in passenger car units, on all individual links in Camden and Brent, are summarised below, identifying a rise in traffic flows with the development in place:*

Time Period	Camden Total Link Differences	Brent Total Link Differences
AM 2021	2946	4724
AM 2031	8282	7072
PM 2021	5173	4390
PM 2031	7331	8461
Sat 2021	7601	6347

Sat 2031	10046	12348
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The most significant changes in flow on the local roads in Camden in 2021 have been analysed and are summarised in the following tables:

Top Ten Increases in Traffic Flow on Roads in Camden (2021)

Road	From	To	2012 Actual Flow (pcu/hr)	2021 No Development (pcu/hr)	2021 With Development (pcu/hr)	Difference	% Difference
A41	Studholme Court	Croft Way	751	872	1172	300	34%
A41	Croft Way	Ingham Road	797	917	1217	300	33%
A41	Parsifal Road	Studholme Court	797	917	1217	300	33%
A5	Skardu Road	Anson Road	489	582	762	179	31%
A41	Ingham Road	Ingham Road	997	1246	1421	174	14%
A41	Ingham Road	Weech Road	952	1201	1375	174	14%
A41	Weech Road	Weech Road	998	1247	1421	174	14%
A41	Weech Road	Ardwick Road	1020	1204	1367	163	14%
A41	Ardwick Road	Ardwick Road	1066	1249	1412	163	13%
A41	Ardwick Road	Ardwick Road	1066	1249	1412	163	13%

Road	From	To	2012 Actual Flow (pcu/hr)	2021 No Development (pcu/hr)	2021 With Development (pcu/hr)	Difference	% Difference
A41	Parsifal Road	Studholme Court	1610	1519	1687	168	11%
A41	Studholme Court	Croft Way	1563	1475	1641	166	11%
A41	Croft Way	Ingham Road	1609	1521	1687	166	11%
A41	Burgess Hill	Finchley Road	1918	2009	2163	155	8%
A41	Platt's Lane	Burgess Hill	1918	2009	2163	154	8%
A5	Skardu Road	Anson Road	579	767	916	150	20%
A41	Weech Road	Ardwick Road	1655	1697	1822	125	7%
A41	Ardwick Road	Ardwick Road	1701	1743	1868	125	7%
A41	Ardwick Road	Ardwick Road	1701	1743	1868	125	7%
A41	Ingham Road	Weech Road	1656	1705	1828	123	7%

Road	From	To	2012 Actual Flow (pcu/hr)	2021 No Development (pcu/hr)	2021 With Development (pcu/hr)	Difference	% Difference
A5	Skardu Road	Anson Road	468	591	941	350	59%
A5	Anson Road	Skardu Road	478	515	840	325	63%
A5	Skardu Road	Manstone Road	404	409	668	259	63%

A5	Manstone Road	Skardu Road	523	642	870	228	35%
A4200	Polygon Road	Cranleigh Street	298	330	479	148	45%
Phoenix Road/A4200	Werrington Street	Polygon Road	67	155	278	123	79%
Garlinge Road	A5	Fordwych Road	135	132	253	121	91%
Phoenix Road	Werrington Street	Chalton Street	171	121	221	100	83%
A41	Alvanley Gardens	Lymington Road	1313	1503	1596	92	6%
B507 Abbey Road	Belsize Road	Boundary Road	344	320	410	90	28%

Top Ten Decreases in Traffic Flow on Roads in Camden (2021)

Road	From	To	2012 Actual Flow (pcu/hr)	2021 No Development (pcu/hr)	2021 With Development (pcu/hr)	Difference	% Difference
Fortune Green Rd	Parsifal Road	Burrard Road	610.36	669.05	437.3	-231.75	-35%
Fortune Green Rd	Burrard Road	Parsifal Road	534.32	646.23	477.88	-168.35	-26%
Fortune Green Rd	Lyncroft Gardens	Mill Lane	878.29	979.85	819.5	-160.35	-16%

Fortune Green Rd	Parsifal Road	Lyncroft Gardens	838.61	954.71	801.25	-153.46	-16%
Mill Lane	Fortune Green Road	Holmdale Road	594.38	656.85	510.01	-146.84	-22%
Mapesbury Rd	A5 Shoot-Up-Hill	Exeter Road	468.47	524.23	379.01	-145.22	-28%
Mill Lane	Holmdale Road	Westbere Road	586.86	644.06	504.03	-140.03	-22%
Burrard Rd	Fortune Green Road	Ingham Road	200.73	329.19	203.3	-125.89	-38%
Burrard Rd	Ingham Road	Finchley Road	200.73	329.19	203.3	-125.89	-38%
A5 Shoot-Up Hill	Minster Road	Walm Lane	438.4	524.62	401.51	-123.11	-23%

Road	From	To	2012 Actual Flow (pcu/hr)	2021 No Development (pcu/hr)	2021 With Development (pcu/hr)	Difference	% Difference
Dersingham Road	Cricklewood Lane	Caddington Road	260.39	216.76	69.26	-147.5	-68%
Ebbsfleet Road	Cricklewood Bdwy	Fordwych Road	150.59	219.63	73.68	-145.95	-66%
Fordwych Road	Ebbsfleet Road	Cricklewood Lane	274.76	406.42	262.1	-144.32	-36%
Mill Lane	Fortune Green Road	Holmdale Road	519.76	672.77	536.79	-135.98	-20%
Mill Lane	Holmdale	Westbere Road	426.16	583.01	450.56	-132.45	-23%

	Road						
Mill Lane	Westbere Road	Fordwych Road	288.7	438.83	321.53	-117.3	-27%
Fortune Green Road	Lyncroft Gardens	Mill Lane	721.08	903.87	803.27	-100.6	-11%
Mapesbury Road	A5 Shoot-Up-Hill	Exeter Road	274.84	354.85	257.19	-97.66	-28%
B525 Avenue Road	Avenue Close	St Edmunds Terrace	627.06	666.1	570.09	-96.01	-14%
B525 Avenue Road	Queens Grove	Avenue Close	613.27	653.12	557.2	-95.92	-15%

Road	From	To	2012 Actual Flow (pcu/hr)	2021 No Development (pcu/hr)	2021 With Development (pcu/hr)	Difference	% Difference
Fordwych Road	Ebbsfleet Road	Cricklewood Lane	220.51	410.88	200.48	-210.4	-51%
Whitestone Walk	N End Way	W Heath Road	620.49	651.22	472.63	-178.59	-27%
Cranleigh Street	Werrington Street	Eversholt Street	395.23	340.05	171.07	-168.98	-50%
Anson Road	Chichele Road	Sheldon Road	169.29	240.89	86.81	-154.08	-64%
A502 North End Way	Spaniards Road	Whitestone Walk	1379.3	1423.16	1276.56	-146.6	-10%

A502 North End Way	Whitestone Walk	Spaniards Road	1405.95	1398.9	1272.71	-126.19	-9%
Rondu Road	Cricklewood Bdwy	Fordwych Road	264.77	281.96	166.13	-115.83	-41%
Mill Lane	Fortune Green Road	Holmdale Road	495.93	628.13	520.48	-107.65	-17%
Cranleigh Street	Chalton Street	Werrington Street	507.68	590.1	483.8	-106.3	-18%
Harman Drive	Farm Avenue	Brondesbury Cricket	313.8	320.66	216.95	-103.71	-32%

*An additional capped contribution of £300,000 towards future Supplementary Transport Measures in Camden and Brent has been agreed with the Brent Cross Development Partners (letter dated 2<sup>nd</sup> September 2015) and can be utilised if monitoring of traffic flows shows an increase in traffic due to the development. Allocation of this funding will be via the Transport Advisory Group, membership of which is open to both boroughs.*

- The information submitted does not allow Camden the opportunity to assess the impact on the junctions, it simply talks about junctions with impacts above 90%, there is no consideration if junction impacts has increased significantly and might just below this figure at say 87% or 88%.

**Officer Response:** *The analysis has been undertaken based on the scope of the study, agreed with both Transport for London and the London Borough of Barnet. For improvements at junctions that do meet the set saturation requirements, funding is available via the supplementary transport measures allocation. The scope states:*

*'The analysis will be undertaken to compare 'V/C' (flow to capacity ratios) from the BXC DDM Saturn modelling in the future year scenario with no development (Do Minimum) with the V/C for phase 1 and end state model (Do Something). Junctions where 'V/C' is more than or equal to 90% in the with development scenario and less than 90% in the Do Minimum will be subject to detailed capacity analysis using the appropriate junction modelling tool (i.e. TRANSYT/LinSig/PICADY/ARCADY).*

*Where BXC DDM identifies junctions where 'V/C' is greater than 90% in the Do Minimum (in the vicinity of the development), consideration will be given to the most appropriate package of mitigation, or as termed in the s106 agreement; 'supplementary transport measures'.*

*Recommendations will be presented to the Transport Advisory Group where confirmation on how the transport fund should be used to progress intervention measures.'*

- Parking impacts stop at the borough boundary, given the size of Brent X and the potential draw from Camden, it is considered that impacts on parking would be felt in Camden, no evidence has been submitted to determine what the impacts could be. This statement is also noted in context of the PERS and CERS audits in that although some aspects are within Camden minimal assessment has been attached to the information on which Camden can comment. There is also a concern, specifically in relation to the CERS audit that this has just concentrated on the A5, no consideration has been given to parallel routes to the east, within Camden.

**Officer Response:** *The impact of parking within Camden has been assessed within the Car Parking Management Strategy. The Controlled Parking Zones (CPZ's) within Camden which are in closest proximity to the proposed regeneration are:*

- *CA-P: University College Sports Ground to the north, Fortune Green Road to the east, Minster Road to the south, Westbere Road to the west: 10:00-12:00 Mon – Fri.*

*The CPZ is located approximately 3 km from Brent Cross Shopping Centre and 2.4 km from the centre of the Regeneration Area to the south of the A406.*

- *CA-Q: Richborough Road to the north, Fordwych Road to the east, Minster Road to the south, A5 Cricklewood Broadway to the west: 08:30-18:30 Mon-Fri*

*The CPZ is located approximately 3.1 km from Brent Cross Shopping Centre and 2.5 km from the centre of the Regeneration Area to the south of the A406. Cricklewood Railway Station is located approximately 200 metres to the north of the CPZ.*

*The decision to either change existing CPZ restrictions or to introduce new CPZs in areas with uncontrolled parking would be made by the relevant borough, based on the results of monitoring and taking into consideration complaints about overspill parking from residents. However,*

*the CPZs that are most at risk from overspill parking from areas to the south of the A406 are Brent Cross Station (BX), Golders Green (H) and Cricklewood (C1) and not those within Camden.*

*As part of the Area Wide Walking and Cycling Study, CERS audits extending into Camden on alternative routes to the A5 have been undertaken, with improvements for cyclists within Camden being identified and funded by the developer. These consist of provision of:*

- *Directional signage*
- *Cycle awareness signage*
- *Carriageway symbol markings*
- *Refreshed road markings*
- *Improved carriageway surfacing*
- *Extended cycle lane*
- *Widen feeder lanes*

*on routes to West Hampstead and Kilburn Town Centre / Kilburn High Road London Overground station.*

- Overall, both these reports are extremely detailed and complex covering several key aspects. The advice in the submissions that the impacts will not be felt beyond the borough boundary despite the size and draw of the development continues to be questioned by Camden. It is our view that the impacts in Camden have not been considered in detail and continue to lack information on which comments can effectively be made.

**Officer Response:** *The highway modelling, car parking review and cycling linkage to the site have including parts of Camden. Based on the concerns of the London Borough of Camden, the links with the most significant changes in traffic flow in 2021 and 2031 have been assessed. If monitoring of traffic flows shows increase due to the development, an additional capped contribution of £300,000 towards future Supplementary Transport Measures has been agreed with the Brent Cross Development Partners (letter dated 2<sup>nd</sup> September 2015) for the adjacent boroughs. Monitoring of parking in Barnet, Brent and Camden will be undertaken as the development progresses, but it is not envisaged that demand will increase in Camden due to the proposals. Improvements for cyclist are also being funded by the development to improve sustainable linkage to the development site.*

## Consultation Responses from Other Groups

### London Cycling Campaign (LCC) in Brent, Barnet and Camden dated 18th December 2014

“We are principally concerned in this matter because the proposed changes to the junction of the A5 with the A406 North Circular Road at Staples Corner West will impact on many of our members and other cyclists in Brent, Barnet and Camden using the A5 as a cycle route between local suburbs, and between these suburbs and the West End, for which journeys the A5 is the most direct and practical route. The A5 has been designated as a cycle route, LCN+5, and therefore our views should be strongly weighed.

We consider that the A5 Corridor Study submitted here does a wholly inadequate job of examining and analysing the issues for cycling on the A5 corridor, in particular at Staples Corner, and that it should not be considered as an adequate document to discharge the conditions of the planning permission.”

**Officer Response:** *The A5 Corridor Study recognises that congestion on the network is a problem. Therefore, where practicable, as part of the overall approach to the A5 corridor and the wider regeneration scheme, where highway interventions are proposed, the aim has been to both protect buses from congestion, and encourage walking and cycling through positive design measures.*

*The A5 Corridor Study provides a review of pedestrian and cyclist accessibility, cycle parking and routing.*

*The volume of cyclists using the A5 corridor on a weekday ranges from 48 towards the north of the corridor (observed 2-way flow near Humber Road) to 73 towards the south of the corridor (observed 2-way flow near Chichele Road). The AM peak hour is the busiest period for cyclists out of the peak hours surveyed. Cyclists represent up to 4% of the traffic composition.*

*On a Saturday, cycle demand during the peak hour was observed to low with a maximum 2-way flow of 18 cyclists on the central section. Cyclists represent approximately 1% of the traffic composition.*

*The existing pedestrian and cycle links along and alongside the A5 have been reviewed for this study using the PERS (pedestrian environment review system) and CERS (cycling environment review system) assessment tools.*

*A total of 12 cycle links, 4 junctions and 4 cycle parking areas were audited along the A5. The links were determined by the changes in the cycle environment (such as type of cycle facility provided or change in surrounding land uses) and were separated as follows:*

- Link 1 (L1): Staples Corner to Geron Way*
- Link 2 (L2): Geron Way to Opposite Comfort Delgro Building*
- Link 3 (L3): Opposite Comfort Delgro Building to Depot Approach*
- Link 4 (L4): Depot Approach to A407 Junction*
- Link 5 (L5): A407 Junction to Rondou Road*
- Link 6 (L6): Rondou Road to Mill Lane*
- Link 7 (L7): Mill Lane to Rondou Road*
- Link 8 (L8): Rondou Road to A407 Junction*
- Link 9 (L9): A407 Junction to Longley Way*
- Link 10 (L10): Longley Way to Humber Road*
- Link 11a (L11a): Humber Road to Staples Corner (on road route)*
- Link 11b (L11b): Humber Road to Staples Corner (off road route)*
- Link 12a (L12a): Across A5 / A406 Staples Corner Junction (off road)*
- Link 12b (L12b): Across A5 / A406 Staples Corner Junction (on road)*

*With the exception of cycle parking near Keyes Road, which scored as green (good), all cycling provision was rated as amber (average).*

*The plan in Appendix 6 of this report identifies the improvements put forward as part of the A5 study to improve conditions for pedestrians and cyclists on the A5 and encourage more people to travel by both modes on the corridor. The suggested improvements are initial proposals that are subject to feasibility and detailed design at a later stage.*

“The authors of the study have not assessed cycling conditions on the A5 against modern London guidance. They should have used the new London Cycle Design Standards (issued in draft earlier this year) and they should have used the Cycling Level of Service Assessment contained in that document to assess the level of service provided to cyclists by the A5 as it stands and as it would stand under the proposed

developments. They should then have made recommendations as to measures that should be taken to bring the Level of Service score to an acceptable value.”

**Officer Response:** *The basis, scope and extent of the study were agreed prior to the issue of the new London Cycle Design Standards. Therefore, the proposals are based on the standards at the time of commencement. Where possible, changes in standards have been taken into account as the study has progressed. Transport for London has agreed with this approach.*

“The volume of traffic on the A5 corridor is such that to provide an acceptable cycling environment, segregated cycle tracks are required. The report fails in an elementary way in its analysis of cycling in failing to make this point. There is no way that the painted cycle symbols suggested for the A5 carriageways are an adequate treatment for cycling on such a busy road, and one that will contain even more HGVs when the new waste facility is built.”

**Officer Response:** *Segregated cycle provision will have significant implications on other road users on this transport corridor in terms of travel times / delay for other modes on the corridor, including buses. The cycling and walking networks proposed within the development provide improved permeability, safety and the quality of provision for both cyclists and pedestrians. Many of the proposals are aimed at increasing the safety of vulnerable users within the context of the assessment.*

“The report, critically, also fails to make recommendations for how a safe route could be created through the Staples Corner West junction; in fact it totally ignores the issues around this junction, and is thus, from our point of view, a complete failure and not up to a basic standard of competence to be expected for such a report.

Any argument that cycling conditions at Staples Corner junction need not be considered because alternative cycle routes will be provided through the development is unacceptable because:

1. The scenario that all or even most cyclists currently using the A5 will divert to these new routes is not a credible one, as the new routes will be less direct, and will be slow and inconvenient as involving convoluted ramps and paths shared with pedestrians;
2. As we do not know the phasing of the building of the new facilities within the development area, there is no guarantee that these routes will come into existence before works take place on the A5 corridor which will probably make it more dangerous for cycling than at present; and,

3. The new routes appear, even when fully built, not to provide a connection with the northbound carriageway of the A5 immediately north of Staples Corner, and therefore it appears cyclists travelling northbound on the A5 corridor will have no alternatives to using the A5 carriageways under these plans.

Since none of these points are addressed by the A5 Corridor Study, we consider it to be a very defective document with respect to cycling. We suggest that the relevant sections of report be rewritten taking these points into account, and that the application not be allowed to proceed until this has been done.”

**Officer Response:** *The proposed improvements for cyclists at M1/A406 and A5/A406 (Staples Corner) consist of:*

- *Provision of a toucan crossing across the A5 on the northern side of Staples Corner*
- *Provision of continuous off-road shared footway/cycleway facilities alongside both the eastbound and westbound A406 carriageways linking from the A5 toucan crossings and Bridge B6 (pedestrian and cycle bridge)*
- *Bridge B6 (pedestrian and cycle bridge) over the A406 linking with shared footway/cycleway facilities on either side*
- *Replacement pedestrian bridge provided to the west of Bridge B6 (west of the rail arches), the new ramp on the northern side of the bridge will be wider than the existing provision to benefit mobility impaired users*
- *General refurbishment of the remaining existing Staples Corner footbridges (lighting/painting etc.)*

*Staples Corner is a gateway junction, the design of which has full planning permission. The proposed highway layout remains as shown in the current Planning Consent, but the detailed assessments carried out during the preparation of the A5 Corridor Study have shown that the lane markings need to be refined so that the road junction can better manage the pattern of traffic demand. The minor changes are as follows:*

- *Lane configuration on the A5 southbound off-slip has been modified to better suit the level of demand heading to the A406 east and westbound*
- *Changing lane markings on the western arm of the A406 from ‘two to four lanes’ to ‘three to four lanes’ to facilitate greater lane/flare occupancy*
- *Change in lane markings to give greater priority to the dominant movement from the M1 to the A406 westbound*

*The introduction of a dedicated north-south cycle facility would be a significant change to the existing design and therefore require a new planning application to be approved.*

**Email from Campaigns Manager, London Cycling Campaign dated December 2014 (Appendix G)**

“We are concerned because the proposed changes to the junction of the A5 with the A406 North Circular Road at Staples Corner West will impact on many of our 12 500 members who live, cycle and work in this area, along with significant numbers of other cyclists in Brent and Barnet. Specifically those who use the A5 as a cycle route between local suburbs, and between these suburbs and the West End, for which journeys the A5 is the most direct and practical route. Given that the A5 has been designated as a cycle route, LCN+5, the comments and concerns put forward by Brent Cyclists should be strongly weighed.

As Brent Cyclists have outlined, we consider that the A5 Corridor Study submitted does an inadequate job of examining and analysing the issues for cycling on the A5 corridor, in particular at Staples Corner. It should not be considered as an adequate document to discharge the conditions of the planning permission.”

***Officer Response:*** *The proposed improvements for cyclists at M1/A406 and A5/A406 (Staples Corner) consist of:*

- *Provision of a toucan crossing across the A5 on the northern side of Staples Corner*
- *Provision of continuous off-road shared footway/cycleway facilities alongside both the eastbound and westbound A406 carriageways linking from the A5 toucan crossings and Bridge B6 (pedestrian and cycle bridge)*
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*The introduction of a dedicated north-south cycle facility would be a significant change to the existing design and therefore require a new planning application to be approved.*

*“We agree with Brent Cyclists in their assessment that the authors of the study have not assessed cycling conditions on the A5 against modern London guidance. They should have used the new *London Cycle Design Standards* (issued in draft earlier this year) and they should have used the *Cycling Level of Service Assessment* contained in that document to assess the level of service provided to cyclists by the A5 as it stands and as it would stand under the proposed developments. They should then have made recommendations as to measures that should be taken to bring the Level of Service score to an acceptable value.”*

***Officer Response:*** *The basis, scope and extent of the study were agreed prior to the issue of the new London Cycle Design Standards. Therefore, the proposals are based on the standards at the time of commencement. Where possible, changes in standards have been taken into account as the study has progressed.*

*“The volume of traffic on the A5 corridor is such that to provide an acceptable cycling environment, segregated cycle tracks are required. The report is deficient in its analysis of cycling in failing to make this point. It also fails to make recommendations for how a safe route could be created through the Staples Corner West junction; in fact it totally ignores the issues around this junction, and is thus, as Brent Cyclists have suggested, not up to a basic standard of competence to be expected for such a report.”*

***Officer Response:*** *Segregated cycle provision will have significant implications on other road users on this transport corridor in terms of travel times / delay for other modes on the corridor, including buses. The cycling and walking networks proposed within the development provide improved permeability, safety and the quality of provision for both cyclists and pedestrians. Many of the proposals are aimed at increasing the safety of vulnerable users within the context of the assessment.*

“As Brent Cyclists have requested, we suggest that the relevant sections of report be rewritten taking these points into account, and that the application not be allowed to proceed until this has been done.”