

Chloe,

Further to Mary's email dated 9 October 2017, please find below Transport & Regeneration comments in relation to the above application (for ease of reference the comments are set out as per the submitted Transport Report):

- 1.3 & 3.1: Clarification is sought on what type of development the Transport Report assumed in their assessment (e.g. rail and road based or only road based). Section 1.3 mentions that a market study concluded that there was no longer a market demand for an intermodal freight facility and therefore in response to this study the proposals for the RFF have evolved from an intermodal facility, as envisaged in the s73 permission, to an aggregate and muckaway facility as proposed in the application. However, Section 3.1 mentions that the proposed RFF is an aggregate and construction spoil terminal which will allow transfer of material from rail to road and vice versa.
- 2 and 3.1: No information has been provided in terms of the existing permitted use of the site (such as land use and floor areas). In accordance with the scoping report this is required in order to establish baseline conditions as well as the trip generation of the permitted use of site. Section 3.1 only mentions that prior to clearance in 2017 the site was used for a mixture of land uses including commercial, rail sidings and related activities, residential and light industrial. It is noted that the pedestrian surveys were undertaken in May 2017 and it is not clear if the site was in full operation at that time.
- 2.6: The three arm priority controlled junctions along the A5 corridor (Geron Way, Oxgate Gardens and Dollis Hill Lane) have recorded the highest rates of Personal Injury Accidents (PIA's). However, despite providing it for other junctions, summaries have not been provided for the priority controlled junctions with the higher rates of incidents. This is required.
- 3.1: The site will provide / maintain access to Network Rail's existing maintenance access point and the existing National Grid compound and building. The traffic generation of these uses (particularly the compound and building) have not been further considered with no justification provided.
- 3.1: The layout plan shows a secondary area that is set aside for car parking located on the southern end of the site. Clarification / details are sought in relation to this.
- 3.1: There are inconsistencies between the two plans in relation to the site layout ('General Site Layout' and 'Vehicle Tracking and Visibility').
- 3.2: No dedicated right turn lane into the site is proposed on the A5. An operational and road safety assessment should be undertaken in relation to the suitability of the proposed site access. Reference to DMRB Volume 6 Section 2 Part 6 (TD 42/95) suggests that based on the anticipated volumes of traffic a 'ghost island' type arrangement would be suitable.
- 3.2: In accordance with the scoping report, swept path analysis should be provided for the largest anticipated vehicle using the site in order to establish if their movements can be accommodated on site (entering, turning around within each of the plots and exiting). Swept path analysis for the car park and movement of a refuse vehicle accessing the refuse collection points should also be provided for review.
- 3.2: A swept path analysis was undertaken for vehicles using the site access off the A5 corridor. This indicates that vehicles can make the manoeuvre if they cross over and use both lanes of traffic on the A5 in order to turn into the site. Considering the frequency and volumes of traffic on the A5 this is not considered acceptable.
- 3.2: In accordance with the scoping report a scaled plan showing the full visibility splay and how this is to be achieved is required for review. The plan provided does not show the full extent of the visibility splays.
- 3.2: A reduction in the existing southbound bus lane is proposed, immediately south of the informal access. What level of agreement has been achieved with TfL? This should be shown on the proposed site access plan.
- 3.3: It is mentioned that '*internally within the RFF a 2m footway will provide safe pedestrian access within the proposed development.*' However, a review of the site plans indicates that safe pedestrian linkage has not been fully considered within the design. There are no footways shown leading into the site and to the welfare facilities or anywhere else within the site, other than on the east side in front of the plots. There are pedestrian safety concerns in relation to large vehicles manoeuvring

within the site with a lack of footway provision.

- 3.3: The proposed hours of operation differ from the A5CS addendum document where the hours are specified as 06:00-18:00 hours with no Saturday working. There are also differences in the reduced numbers of vehicles (540 in A5CS and 452 in Transport Report). The documents should be consistent.
- 3.3: It is queried if 9 employees is a realistic assumption if there are 4 plots being let out to more than 1 company.
- 3.3: How will the ANPR work at the security gate in order to prevent delays to vehicles and possible queuing in the access road? If queuing of HGV's occurs on the access road would this block access to the general car parking area?
- 3.4: Cycle parking for permanent staff should be enclosed, weatherproof and secure not just covered. Shower provision should be on site from the outset with covered visitor cycle parking in the car park in a location that is overlooked by the security cabin.
- 3.4: No mention is made to motorcycle parking provision on site.
- 3.5: Why is HGV parking required outside of the 'on plot' parking? How would HGV's turn to exit these areas, in which case should parking be formalised?
- 4: Thameslink model agreement and its details are being investigated.
- 4: Does the Thameslink Model consider the retention of Lidl, Timeguard and the Self-Storage building?
- 4: It is mentioned that *'for the highway impacts associated with the RFF, an additional assessment has been used to ensure the traffic generated by the RFF is reflective of the likely scenario.'* Clarification is sought in relation to this additional assessment.
- 4: The scoping report makes reference to person trip generation assessment and its distribution across all modes. This has not been undertaken.
- 4.2: Surveys have been undertaken of an existing rail freight facility located at the A400 Horn Lane / Industrial estate junction. Further information needs to be provided in order to establish if this site is comparable to what is being proposed (e.g. in terms of volumes of materials being imported / exported by each mode whether it be by road or rail, staff numbers, operating times).
- 4.2: It is not understood why cars have been excluded from the site survey data as this would most likely represent staff. Only OGV1 and OGV2 type vehicles have been taken into account.
- 4.3: Further information is sought in terms of anticipated vehicle arrival / departure profiles throughout the day. The Transport Report assumes an equal distribution of vehicles throughout the day.
- 4.4: *'The turning movements into and out of the proposed RFF have been based on the existing turning proportions at the existing junction'* which has only 27% of traffic turning right into the site from the A5. This methodology is not considered appropriate as the previous land use is different to that which is being proposed. The report notes that the facility is proposed to play an important role in helping to deliver the wider BXC development. Is this correct, the traffic assignment assumptions should take this into account with key routes / traffic assignment being clearly specified.
- 4.4: The report mentions that *'the turning movements into and out of the proposed freight facility based on the assessment of operational activities.'* Full details of this assessment are required in order to determine if the proposed traffic generation numbers are justified (this would include volumes of material imported and exported by rail and road, vehicle load capacity and frequency throughout the day). Currently the anticipated maximum number of 800 OGV1 and OGV2 trips has not been justified apart from referring to two trains per day. In addition, no reference has been made to the quantity of materials to be stored and to be transported in the future. Staff trips should also be accounted for in the assessment.
- 4.4: It is mentioned within the report text that the HGV PCU factor is 2.3 but use 2 in the capacity calculations within the appendices. A breakdown of the PCU calculations is required in order to better understand how the stated numbers have been derived.
- 4.5: As the facility is proposed to operate on a Saturday an assessment during this period should be provided (at least in terms of providing a comparison of development and background traffic

volumes).

- 4.7: Servicing and delivery plan should be conditioned
- 4.8: Construction Traffic Management Plan should be conditioned. The scoping report states that the report shall *'also detail the transport impacts of site construction, including the requirements of abnormal loads on the construction, use and decommissioning the present development and proposed mitigation measures. Additionally, if the site can be utilized for supply chain for the construction of BXC.'* This has not been undertaken.
- Travel Plan should be conditioned. However, the following comments are made at this stage:
 - i. Cycle parking (page 13): The statement re location of cycle parking for employees is incorrect, it is not shown in the car park but next to the welfare facilities to the north. In addition the employee cycle parking should be covered, enclosed and secure. Separate cycle parking for visitors in the visitor car park should be provided that is covered and overlooked.
 - ii. Monitoring and Review (page 42): itrace compliant surveys for the site rather than the security guard undertaking observations of ingress/egress of vehicles/peds/cyclists to the site.
 - iii. Travel plan action table, C7 (page 42): provision of showers and changing facilities should not be a short term target but provision from the outset prior to occupation, as non-provision for staff at the beginning may discourage cyclists from using this method of travel and then when provided travel methods could be entrenched and no change to cycling would occur.

Until the outstanding issues identified above are appropriately addressed the Transport & Regeneration team cannot support the subject planning application.

Regards

Devinda Kumarasinghe
Brent Cross Cricklewood Regeneration Area
Transport Manager



T [020 8359 3332](tel:02083593332)

Email Devinda.Kumarasinghe@Barnet.gov.uk

Web www.re-ltd.co.uk

Barnet House, 1255 High Road, London N20 0EJ

RE (Regional Enterprise) Limited is a joint venture between Capita plc and London Borough of Barnet.

Registered in England 08615172. Registered Office: 17 Rochester Row, London, England SW1P 1QT.

Please consider the environment - do you really need to print this email?