

# Barnet Local Plan Examination in Public Transport for London (Spatial Planning) response to Inspector Led Consultation

## SoCG 19 – BXSLP and H/abrdrn (Brent Cross)

1. It is not clear why the following bullet point has been deleted on page 13: ‘A new rail freight facility to replace the existing Strategic Rail Freight Site’.
2. The rail freight site is a protected land use. A new rail freight facility has been built on site by DB Cargo and forms an important component in the list of transport improvements. For clarity, this bullet point should be retained with ‘(already constructed)’ added.
3. In the amended paragraph at the end of the list of transport improvements on pages 13 – 14 it should be noted that the funding of works on the Transport for London Road Network (TLRN) and delivery of the new interchange and new bus station is secured in kind via a series of Grampian planning conditions, Indicative Construction Programme and other controls in the s106 agreement, such as Phase Transport Reports. These works include new and replacement bridges over the A406 and major junction works, costing circa £100 million. The only exceptions were to the London Underground step free access scheme and bus subsidy where TfL accepted limited risks with legal safeguards. When TfL agreed the scope of works, the risks of cost escalation rested with the developer, not TfL nor the local authority. This was a fundamental principle of the original planning consent and section 73 amendments.
4. The revised wording could be read to imply that the developer will be able to pass on the financial risk of delivering agreed works to TfL or Barnet, which is not acceptable. The revised wording in the SoCG should be redrafted to make it clear that all financial risk and any cost escalation in the scope of works already agreed will remain with the developer.

**EXAM 14 & 14A – Theresa Villiers MP**

5. We would like to reiterate the points made in our written statement on Matter 6, which address many of the points raised in EXAM 14 & 14A. Key points from that statement are set out below for convenience.

*Car-free development*

6. As set out in Policy T6A of the London Plan, the starting point for all developments in locations which are or are expected to be well-connected is car-free, with all other developments being car-lite. To accommodate the expected growth in London, it is not possible to accommodate more cars on London's fixed road network. Indeed, one of the expected outcomes of the Mayor's Transport Strategy (MTS) is for a quarter of a million cars to be removed from London's roads by 2041. Alongside the mode shift target set out in the MTS and Policy T1 of the London Plan, these strategic objectives can only be achieved through new developments around London being in line with the London Plan's car parking standards. Except for concerns previously raised in our written statement to the examination (para.24-41) and addressed at the Matter 6 hearing, Table 23 and Policy TRC03 of the draft Barnet Local Plan are in line with London Plan policy and are supported.
7. EXAM 14A raises concerns in relation to car-free developments that 'Residents of these new blocks will inevitably own cars and so building without off-street parking will only displace vehicles on to neighbouring roads.' This concern is adequately addressed through both London Plan policies and policies in the draft Barnet Local Plan.
8. Policy T6C of the London Plan states that 'An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.' We are satisfied that TRC03.b and TRC03.c are in line with London Plan Policy T6 and more than adequately address concerns related to car-free developments leading to 'parking stress' in their vicinity.

*Development on station and town centre car parks*

9. Car parks in town centres and at transport hubs, including rail stations are appropriate locations for car-free development due to their inherently well-connected nature.
10. Since the Barnet Local Plan EiP hearings, the Mayor has published the Sustainable Transport Walking and Cycling London Plan Guidance<sup>1</sup> which states that ‘Development Plans should identify opportunities generated by declining demand for car-based infrastructure/land and/or where land could be used more efficiently for other uses as well as incentivising mode shift. This includes the redevelopment of car parks for suitable development in line with Policy SD7, Policy H1 and Policy H2 of the London Plan, particularly where these have good access to public transport connections.’
11. Car parks in town centres and at transport hubs, including rail stations and Underground stations, such as High Barnet, are by definition well-connected and typically have a high PTAL<sup>2</sup> commensurate with the characteristics of that location. Prioritising development in these locations enables people to make their day-to-day journeys by sustainable modes and supports the Mayor’s target for 80 per cent of all journeys to be made by sustainable modes by 2041, as set out in the MTS and Policy T1 of the London Plan.
12. In the case of High Barnet, the car park only has 155 spaces. Given during the week many of those spaces will be occupied for extended periods, this does not significantly increase access to the Underground network. A typical weekday in 2019 saw 12,000 passengers use High Barnet station while a typical Saturday in 2019 saw 8,000 passengers use the station. Additionally, 92 per cent of passengers accessed the station by sustainable modes. Over half of those that drove to the station live outside the borough and would likely be able to use a local rail connection. This demonstrates that the car park does not have a material

---

<sup>1</sup> Sustainable Transport, Walking and Cycling LPG: <https://www.london.gov.uk/sites/default/files/2022-12/A%20Sustainable%20Transport%20Walking%20and%20Cycling%20LPG.pdf>

<sup>2</sup> High Barnet and vicinity, for example, has a PTAL of 5-6a.

impact on the overall ridership of the station, particularly during the week.

13. The assertion that ‘bus services are limited, especially outside peak hours’ is false. High Barnet is served by seven bus routes, all but one of which are served by at least four buses per hour from before the morning peak until after the evening peak, ie 7:00–20:00, and most services running at least three buses per hour and up to six per hour after 20:00 during the week, with regular services during the weekend as well. Increasing numbers of residents living car free around High Barnet would also make additional services more viable, thus improving the public transport network for existing residents and enabling more people to live car-free or car-lite lifestyles. In the 2021 Census, 29.9 per cent of Barnet households reported living without a car or van which is an increase from 28.7 per cent in 2011. Further, in the 2021 Census, 45.0 per cent of households reported living with only one car or van which is an increase from 44.1 per cent in 2011. This demonstrates that Barnet’s residents are increasingly choosing to live either without a car or only one car. Supportive planning policy will enable this trend to continue and accelerate.

### **EXAM 23 – LBB Note Action 33 – Transport Infrastructure**

14. For entries 2,3,4 and 5 in the table (Hendon Central, High Barnet and Finchley Central and additional gates at the named stations) the cost and funding source states ‘Likely to be funded by TfL with some funding from surrounding developments under s106 if in accordance with regulation 122 tests and demonstrated in Transport Assessments.’ The reference to TfL funding should be removed unless there are prior commitments in place or funding has already been secured as in the case of Colindale. Where demand for station improvements is generated by development eg additional ticket gates the cost should be met by the relevant developers. In other cases, gap funding may need to be secured, eg from the Housing Infrastructure Fund. It is misleading to suggest that general TfL funding is likely to be available given the current funding situation and as such, this should be removed.

**EXAM 49 – Barnet Local Plan EIP - Note on Policy TRC02 (Transport Infrastructure)**

15. TfL supports the proposed modifications set out in EXAM 49.

**EXAM 50 – Barnet Local Plan EIP – Note on TRC01 (Sustainable and Active Travel)**

16. TfL supports the proposed modifications set out in EXAM 50.

**EXAM 52 – Barnet Local Plan EIP – Note on Parking Management (Policy TRC03)**

17. As noted in EXAM 52, TfL supports the proposed modifications to Paras 11.12.2 and 11.12.3, as well as the proposed modifications to Table 23 agreed at a meeting with LBB on 27 October 2022.

18. We additionally support the proposed modifications to TRC03(b) (MM299) and Paras 11.11.1, 11.12.4, 11.12.6 and 11.12.7A, particularly the statement that developments should ‘limit’ parking in accordance with the relevant London Plan standards. The proposed approach to capping permits in CPZs appears to be sound and does not conflict with London Plan policy. Overall, the amendments result in the policy and supporting text more appropriately align with the spirit of Policy T6 of the London Plan.

19. However, proposed new paragraph 11.12.6A runs counter to the above approach of limiting car parking in line with London Plan car parking standards in Policy T6. While we support the modified wording in TRC03(d) which is more nuanced than the original text, TfL specifically objects to the supporting text linking car parking to town centre vitality and viability without supporting evidence. TfL evidence<sup>3</sup> shows that investment in high street walking, cycling and public realm improvements increase retail sales by up to 30 per cent, and over the course of a month, people who walk to the high street spend up to 40 per cent more

---

<sup>3</sup> TfL, ‘Walking and Cycling: The economic benefits’. <https://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>.

than people who drive to the high street. As stated in our written statement to the EiP, ‘reducing car parking in well-connected locations, such as town centres, will encourage mode shift consistent with the Mayor’s mode shift targets and is an essential element of encouraging sustainable travel, consistent with Policy TRC01.’

20. Reducing destination car parking provision, including in town centres is a key element of ensuring sustainable development in London and provides a complex set of benefits which leads to a virtuous cycle of increasing sustainable mode share. We direct the Inspectors’ attention to Paras 1-6 of our written statement. Additionally, studies highlighted in the London Plan evidence base demonstrate that mode shift away from cars and to sustainable modes occurs when destination car parking is reduced. To support the shift towards sustainable modes, the draft Barnet Local Plan should take a positive approach to restricting car parking in town centres. As stated in TfL’s Written Statement to the London Plan EiP (M84), ‘The retail parking standards...do not seek to cater for higher provision that might be sought in less well-connected areas, which would generate additional car trips (and the associated congestion and emissions) and undermine the Plan’s town centre first approach. Car dependent retail poses significant and particular problems in the London context.’
21. TfL generally supports the other proposed changes to TRC03, except for the minor proposed change below which will ensure consistency with Policy T6 of the London Plan and internal consistency within the policy.
  - a. Suggested text: ‘The Council will expect development to provide limit car and motorcycle parking in accordance with the London Plan Standards ...’

#### **EXAM 57 – Barnet Local Plan EIP – Strategic Policies GSS11 & GSS12**

22. TfL supports the proposed modifications set out in EXAM 57, however we maintain our objection to linking car parking provision with the vitality and viability of town centres and ‘thriving and competitive’ town centres as shown in Para 4.27.2, and discussed above in Paras 19-20 of this response.