

Barnet Local Plan Examination in Public Transport for London Commercial Development Written Statement on: Matter 6: Transport, Communications and Infrastructure

2) *Is Policy GSS12; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should specifically address the following:*

...

b) *Is there sufficient evidence to justify the loss of parking in town centres or other locations such as public transport hubs whilst ensuring an appropriate level of provision necessary to support their vitality and function, and is the overall approach consistent with Policy TRC01?*

TfL CD supports the re-development of publicly accessible surface level car parks for residential and other suitable uses. Particularly for car parks at stations and other public transport hubs, we consider that Policy GSS12 is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan. Reducing car parking in well-connected places and optimising its redevelopment for other uses, particularly housing-led, mixed-use schemes, makes better use of under-utilised sites and encourages sustainable travel. When parking is removed or reduced, other modes become more attractive because less car use results in less congestion, improved safety and more viable public transport. This is especially the case with TfL CD developments which also seek to deliver improvements to public transport and active / healthy modes in addition to new homes and jobs.

To deliver the London Plan and the Mayor's Transport Strategy (MTS), it is essential that development in London contributes to making more sustainable places and delivering 'Good Growth'. This requires higher density, mixed-use redevelopment of brownfield sites in accessible locations that makes effective use of land and encourages mode shift away from car use towards more efficient, sustainable and active modes. This will not only improve the environment in London but will also enable Londoners to be healthier. It also supports London's climate resilience and the move towards a carbon neutral city.

NPPF

The National Planning Policy Framework (NPPF) recognises that for development to be sustainable, it must be directed towards locations that offer a "genuine choice of transport modes" (paragraph 105), ie. that are not reliant solely on car travel. In addition, the NPPF states that "opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, [should be] realised – for example in relation to the scale, location or density of development that can be accommodated". As such, the principle of redeveloping sites near public transport is considered sustainable and is supported by national policy.

In addition, the NPPF (paragraph 120d) requires policies and decisions to “*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example ... car parks, lock-ups and railway infrastructure)*”.

The loss of car parking at stations in well-connected locations, and its redevelopment to meet identified housing needs where land supply is constrained (clearly the case in Barnet), is therefore consistent with national planning policies.

We also note that in the Department for Transport’s evidence published in 2021 [‘Impact of interventions encouraging a switch from cars to more sustainable modes of transport: a rapid evidence assessment \(REA\)’](#), the redevelopment of town centre car parking is suggested as a way to deliver mode shift in practice. It states: “*Reducing car use by reducing parking availability or introducing city centre access restrictions, for example, is effective but works best when public or active transport alternatives are put in place first*” (page 1). TfL station car parks are already public and active transport hubs and, as indicated above, our schemes also seek to deliver improvements to public transport and active / healthy modes in addition to new homes and jobs.

London Plan and MTS

In the context of London, car park redevelopment is considered to be a good way of achieving the strategic aims set out in both the London Plan and MTS. A key objective of the London Plan is to deliver ‘Good Growth’ and one of its tenets is making the best use of land. Policies SD7 (Town Centres: development principles and Development Plan Documents) and H1 (Increasing housing supply) both advocate the redevelopment of car parks. In both policies, car parks are identified as potential sites for mixed use redevelopment and as potential sources for the development of new housing. In particular, where sites are well connected by public transport, the redevelopment of car parks is considered a way of improving conditions for walking and cycling and encouraging greater use of sustainable (ie. non-car) modes of transport. Additionally, reducing overall parking supply in London is an effective way to reduce Londoners’ dependency on cars and achieve the central aim of the MTS for 80% of trips in London to be made on foot, by cycle or using public transport by 2041 (Policy 1).

Further support for car park redevelopment in London can be found in the draft [Sustainable Transport, Walking and Cycling guidance](#) for the London Plan (September 2021) – section 6 deals with “*car parks and other surplus land*”.

There is no policy backing in London for ‘park and ride’ type facilities and the MTS is clear that stations should be designed for arrival by / onward journey by sustainable modes. It states:

“Stations and stops will be designed for active, efficient and sustainable onward journeys. The first things passengers will see on emerging from the station will be clear walking directions and maps, cycle hire facilities, bus connections and an attractive, accessible and inclusive public realm, rather than car parking and pick-up/drop-off spaces.” (page 131).

This clearly sends a message promoting active, healthy and sustainable journeys to and from stations rather than use of cars.

Please note that TfL CD schemes at stations and other transport hubs seek to improve transport interchange and passenger experience as part of our mixed-use developments. For eg. in our pre-application discussions with the Council in respect of developing the car parks at High Barnet and Finchley Central stations, we have set out our intentions to: encourage active and healthy means of travel by providing cycle hubs (secure storage and other facilities) and improved routes and signage for pedestrians; relocate bus stops to reduce interchange distances and improve access, particularly for disabled passengers and those with young children; and reconfigure taxi and drop-off facilities.

Policy GSS12 is also in conformity with London Plan policy T6 which states that “*car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity*”. Station car parks and other transport hubs clearly have good accessibility and connectivity and, as mentioned above, TfL CD schemes seek to improve transport interchange and passenger experience.

Policy TRC01

The loss of car parking at public transport hubs, whilst ensuring an appropriate level of provision necessary to support their vitality and function, is also consistent with Policy TRC01 which seeks to deliver “*a more sustainable transport network*”,

Car Park Survey

TfL periodically undertakes user surveys at its station car parks. For example, one such survey at High Barnet (a Northern Line station at the north end of the line) in May 2019 found that:

- Only c.4% of passengers using the station also use the car park.
- 53% of responding car park users arrive from outside the borough and a high proportion drive past other national railway stations from where they could access the network with a shorter car journey.
- 80% of respondents live closer to alternative underground and national rail stations.
- Of the respondents originating from within the borough of Barnet, 91.5% live within 400m of a bus stop providing access to the station.

Such surveys can help to provide evidence to justify the loss or reduction of parking in well-connected and accessible locations such as public transport hubs. They help to demonstrate that the level of parking provision within proposed schemes is *appropriate* and at a *level necessary* to support their *function*. As for *vitality*, the redevelopment of car parks for new, well-designed homes in new landscape and public realm settings, together with active uses, will make a very valuable contribution to the vitality of Barnet’s communities.

We also note that modified Policy GSS12 and draft site allocations for TfL station car parks provide for the retention of essential parking spaces for disabled persons and operational reasons. GSS12 requires demonstration that “*the use of public transport and active modes of travel will lead to reduced car park usage*” and that the parking spaces are surplus to requirements (please see eg. paragraph 4.15 of the SoCG). Station car parks will therefore have the protection required to ensure the provision of spaces *necessary* to support the station’s *function*.

- 5) *Are the following proposed modifications to Policy TRC02 necessary for soundness:*
- a) *Amended wording of part a) iii) to more accurately reflect the proposed improvements at Colindale Station?*

Yes. TfL CD has agreed modifications with the Council which confirms that the new transport infrastructure at Colindale will be “*An upgraded and enlarged Colindale Underground station*” (EXAM 4: Council’s Proposed Modifications, MM295). This change ensures that the policy is clearly written and unambiguous.