

**Statement of Common Ground between
London Borough of Barnet (LBB)
and
Transport for London Spatial Planning (TfL SP)
April 2022**

1.0 Introduction

- 1.1 This Statement of Common Ground (SoCG) addresses the strategic planning matters specific to LB Barnet (LBB) and Transport for London Spatial Planning (TfL SP). TfL SP provides the statutory response from TfL as the strategic transport authority.
- 1.2 This SoCG ensures that the requirements set out in the National Planning Policy Framework (NPPF) have been met. The NPPF¹ states, “Local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”
- 1.3 The purpose of the SoCG is to document the strategic matters being addressed and the progress in cooperating to address them. It focusses on areas of agreement or disagreement between both LB Barnet and TfL. A separate SoCG has been prepared with TfL Commercial Development. The document is intended to be ‘live’, updated as circumstances change, and agreement occurs on any outstanding issues. It therefore includes details on mechanisms for review and updating. The SoCG also forms part of the evidence to demonstrate compliance with the ‘duty to cooperate’.
- 1.4 In London, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.
- 1.5 Strategic matters overseen by other bodies such as the Environment Agency will be addressed in other SoCG. This will serve to make the documents more concise for relevant parties.
- 1.6 LBB strategic planning engagement with TfL takes place on pan London platforms such as Planning Officers Society and sub-regionally with the West London Alliance Planning Policy Officers Group.
- 1.7 This iteration of the SoCG applies to Barnet’s submission (Reg 22) Local Plan. It will inform further engagement to ensure effective development and implementation of Local Plan policies. All agreements to proposed actions are subject to reaching agreement on the detailed wording where changes are proposed.

2.0 Strategic Matters

¹ Para 24

- 2.1 LBB and TfL SP have had ongoing dialogue on strategic planning issues for many years. Duty to Co-operate (DtC) liaison meetings have been held regularly between LBB and TfL SP.
- 2.2 LBB and TfL SP agree on the aspiration to support growth in Barnet while enabling a greater mode share for walking, cycling and public transport use. In particular this relates to the Local Plan's ambitions to: reduce car use and achieve mode split targets, implement the Healthy Streets Approach and achieve the Mayor's Vision Zero ambition. Both parties agree with the Local Plan's recognition of the importance of active travel in improving health outcomes and the role reducing car journeys has in improving air quality.
- 2.3 TfL SP agree that LBB's parking standards are in conformity with the London Plan 2021. TfL SP have, however, expressed concerns that some of the accompanying policy text and site allocations need revision to better reflect the London Plan's approach to parking. In particular, references to parking 'requirements' or 'needs' should be further qualified and related only to disabled persons parking and operational parking. Although noting that reliance on assessing orbital travel has been modified slightly, TfL SP still have significant concerns about using a connectivity measure that in their view is not justified nor robust, could be open to challenge, or used inappropriately. TfL SP strongly object to the inclusion of the need to measure orbital travel when considering parking requirements and are concerned it would set a precedent for other local authorities without sufficient evidence to underpin it.
- 2.4 TfL SP recommends more cautious wording regarding the delivery of the West London Orbital rail scheme to reflect that the scheme remains unfunded at the present time. To make the business case for the scheme as strong as possible TfL SP emphasise the importance of maximising sustainable travel and minimising provision for car use.
- 2.5 With safeguarding for the New Southgate section reflected in the draft Local Plan LBB and TfL SP continue to support the long-term prospects for Crossrail 2 and the major benefits the scheme could bring to Barnet and to New Southgate in particular.
- 2.6 LBB and TfL SP support Barnet's ambition for improved public transport connectivity in the Borough, including through buses. TfL SP welcome further discussions on realising this, including identifying where the most significant connectivity gaps currently exist, which may not be purely radial nor orbital. Developments should play their role in supporting higher levels of services and improved reliability, such as through bus priority measures. LBB welcome the news that TfL has joined Barnet in commissioning a Bus Study which will look at improving orbital links through bus priority and bus service planning.

3.0 Chapter 4 Growth and Spatial Strategy

Policy GSS01 Delivering Sustainable Growth

- 3.1 The wording in relation to new public transport infrastructure suggests more certainty about delivery of West London Orbital than is actually the case. LBB agrees to change the text in GSS01 in response to this representation.

3.2 Both parties agree the assessment of potential for new homes at existing and major new public transport infrastructure in part c could be subject to delays to delivery of the named transport projects. There may be scope to develop in and around existing stations while not being dependent on the delivery of specific projects.

3.3 LBB agrees a Proposed Modification as follows to Policy GSS01:

*Major new public transport infrastructure is delivered at the new Brent Cross West station and **as part of a potential** West London Orbital **rail line**, with **longer-term** potential for Crossrail 2, subject to confirmation.*

Policy GSS03 Brent Cross West Growth Area

3.4 TfL SP have highlighted the importance of securing contributions towards both new and improved active travel routes to Brent Cross West station, as well as improved interchange, onward travel facilities and public realm outside the station. LBB agrees to change the policy in response to this representation.

3.5 LBB agrees a Proposed Modification to Policy GSS03 in order to reference potential contributions towards delivery of the West London Orbital scheme:

*The Council will support development proposals that facilitate access to and delivery of the West London Orbital; **proposals may be required to provide contributions.***

Policy GSS04 Cricklewood Growth Area

3.6 TfL SP have highlighted the importance of improving connectivity to Cricklewood Station, along with the interchange and public realm. LBB agrees to change the policy in response to this representation.

3.7 LBB agrees a Proposed Modification to Policy GSS04 as follows:

The Council will seek contributions towards new/improved active travel routes to Cricklewood station, as well as improved interchange, onward travel facilities and public realm outside Cricklewood station.

Policy GSS05 Edgware Growth Area

3.8 TfL SP requests that GSS05 should clarify expectations from development in and around the town centre in terms of contributing towards these improvements to Healthy Streets, additional town centre cycle parking and station cycle parking. While LBB considers that the Edgware Growth Area SPD sets out more detailed requirements and information on sustainable transport and movement, LBB agrees to add a bullet point to GSS05 to reference the Healthy Streets Approach and additional cycle parking.

3.9 LBB agrees a Proposed Modification to Policy GSS05 as follows:

- Deliver improvements to streets and the public realm in line with the Healthy Streets Approach, including additional town centre cycle parking and station cycle parking;

3.10 LBB and TfL SP are open to reviewing the 'relationship between the rail and bus stations and the wider town centre' and support greater integration of the town centre with Edgware station and Edgware bus station. The renewal of Edgware Town Centre emphasises improving public transport alternatives to tackle congestion, including through bus priority and protecting land used for transport. Both parties will seek further joint discussions on how the use of the bus and rail station land can be optimised to unlock growth in Edgware and beyond while maintaining the vital functions they carry out.

4.0 Policy GSS06 Colindale Growth Area

4.1 TfL SP support the ambition to improve connectivity within Colindale and reduce severance where possible. LBB and TfL SP will continue discussions about a new walking and cycle route under the Northern Line to ensure that any potential impacts on the railway are minimised, mitigated and managed. TfL strongly welcome implementing on-street parking restrictions through a Controlled Parking Zone (CPZ) and are happy to work with LBB to implement this where appropriate. LBB agrees a Proposed Modification to Policy GSS06 with regards to Colindale Station to better reflect proposals for the site:

- **Reconstruction and upgrading of Land at Colindale Underground Station will be redeveloped to provide a new, higher to increase its capacity and provide a step-free access station, that incorporates along with additional cycle parking and facilitating the redevelopment of adjacent land owned by TfL and others.**

Policy GSS07 Mill Hill East

4.2 TfL SP requests further clarification on directing the remit of a transport assessment, particularly in regard to cumulative impact on Mill Hill East station as there is limited capacity at its gates and staircases. LBB agrees a Proposed Modification to Policy GSS07 to clarify the remit of any transport assessment as follows:

- **Proposals within Mill Hill East must be supported by a Transport Assessment (TA) setting out public transport improvements and demonstrating how sustainable transport options will be provided. The TA must take into account the cumulative impacts arising from other committed development (ie development that is consented or allocated and where there is a reasonable degree of certainty it will proceed within the next 3 years).**

4.3 **Para 4.23.2** - Although construction work on the West London Orbital may begin by 2026, the earliest date when passenger services are likely to operate is 2029. LBB agrees a Proposed Modification to para 4.23.2 to reflect later date.

The WLO will have positive impacts through unlocking housing delivery and creating leisure, community and amenity opportunities along the corridor. Delivery is expected by ~~2026~~2029 at the earliest.

4.4 **Para 4.23.3** – TfL SP have highlighted the revision to safeguarding in place for part of the Crossrail 2 route to New Southgate. LBB agrees a Proposed Modification to para 4.23.3 to reflect the safeguarding refresh.

- *This safeguarding refresh will include **a revised** ~~the alignment of the proposed New Southgate branch. which is a part of the Crossrail 2 route that is not currently safeguarded.~~*

4.5 **Para 4.24.5** – TfL SP strongly support redevelopment of station car parking to deliver growth and as part of a shift towards sustainable travel. The new London Plan states that car-free development should be the starting point in all well-connected locations. Any re-provision of car parking must therefore be assessed against the same criteria as proposals for a new station with a car park. Where there is sufficient access by active travel and by bus, TfL strongly urge the Council to resist the re-provision of parking except where clearly justified e.g. for disabled persons accessing the station or for operational reasons. Both parties agree that the level of station car parking provision should be assessed in light of encouraging the use of public transport and active modes of travel. LBB agrees a Proposed Modification to para 4.24.5 to clarify expectations on demonstrating need for replacement parking spaces:

- The required level of station car parking provision should be assessed in light of encouraging the use of public transport and active modes of travel, with **the aim to re-provide only where essential, for example for disabled persons or operational reasons.** Essential car parking **could** potentially be re-provided through a more land-efficient design approach.

Policy GSS09 Existing and Major New Transport Infrastructure

4.6 TfL SP supports proposals that facilitate access to and delivery of the West London Orbital at Hendon, as well as seeking contributions towards its delivery. LBB will work with TfL SP to update the assessed potential number of new homes. LBB agrees a Proposed Modification to Policy GSS09 to clarify expectations on demonstrating need for replacement parking spaces.

- ***Proposals with regard to the re-development of car parks must be assessed with reference to Policy GSS12. Where it is proposed to develop a station car park, the Council expects a demonstration of how the use of public transport and active modes of travel will encourage reduced car park usage. Existing provision must be assessed, and replacement car parking may be supported through a more land-efficient design approach such as a multi-storey design **provided, with the aim to re-provide only where essential, for example for disabled persons or operational reasons.*****

Policy GSS12 Redevelopment of Car Parks

4.7 TfL considers that policy and supporting text should be more positive in promoting the removal or reduction of parking spaces, particularly in well-connected locations. TfL consider there is not necessarily 'need' for general car parking in many locations where alternative travel options exist and, as such, there should be no absolute requirement to demonstrate surplus capacity or to replace spaces. Re-provision should only be considered where it is essential, e.g. for disabled persons parking or for operational reasons.

4.8 LBB consider it is important to balance the need to meeting housing requirements in the Borough with the ongoing car parking requirements to support functions such as town centres. LBB consider it important to balance need to meeting requirements for new homes with more efficient management of car parking spaces to support functions such as town centres. LBB agrees a Proposed Modification to Policy GSS12 to clarify expectations on demonstrating need for replacement parking spaces as well as how public transport and active travel can reduce usage.

- **It can be demonstrated** ~~Demonstrates~~ how the use of public transport and active modes of travel will lead to reduced car park usage; and
- The parking spaces can be demonstrated as surplus to requirement, **with the aim to re-provide only where essential, for example for disabled persons or operational reasons.**

5.0 Chapter 5 – Housing

Policy HOU03 Residential Conversions

5.1 With regard to the conversion of larger homes, TfL consider that as suitable sites should be within 400 metres walking distance of a town centre or in an area with a PTAL of 5 or more, residential conversions should be car free with provision only for disabled persons car parking (although cycle parking should meet minimum standards). The wording stating that such conversions should be expressed as a minimum car and cycle parking provision is inaccurate because car parking requirements in Policy TRC03 are expressed as maximum not minimum provision. It would be simpler to state that conversions should be 'car free and permit free while cycle parking should be provided in accordance with minimum parking standards.

LBB agrees that car parking requirements should be considered against Policy TRC03. LBB agrees a Proposed Modification to Policy HOU03(f).

- ~~Minimum~~ Car and cycle provision in accordance with Policy TRC03

6.0 Chapter 6 - Character, Design and Heritage

6.1 **Para 7.7.6** – LBB and TfL SP support opportunities to reduce on-street and off-street car parking as part of town centre development. LBB's view is that appropriate car-parking facilities can contribute to the success of a town centre. LBB agrees a Proposed Modification to para 7.7.6 as follows:

- *In making high streets healthier, opportunities to reduce reliance on car travel should be encouraged, including the creation of attractive and welcoming places that enable well connected walking and cycling routes. **Reducing the dominance of vehicles can support town centre vitality by making public realm more pleasant and inclusive, thus encouraging more frequent and longer trips.** In considering development proposals, opportunities to reduce on-street and off-street car parking should be pursued in accordance with Policy TRC03 whilst acknowledging the contribution of appropriate car-parking facilities to the success of a town centre*

7.0 Chapter 11 Transport and Communications

7.1 **Paras 11.2.1 – 11.8.5** – TfL SP support the positive emphasis placed on supporting sustainable transport and active travel alongside recognition of improvements planned or underway such as step free access at stations. TfL SP welcome references to the Mayor’s and Barnet’s mode split targets, ambitions to achieve Vision Zero, proposed transport projects linked to development proposals and the need to retain and improve public transport infrastructure including garages and depots. TfL SP support continued emphasis on encouraging and supporting new orbital travel links and aim to work with LBB to achieve this while recognising that many journeys are complex and there is often no clear distinction between orbital and radial routes. It is also the case that historic patterns of development - including that of the road network will have greater influence on the direction of travel than many other factors.

Policy TRC02 – Transport Infrastructure

7.2 TfL SP consider that TRC02 should clearly state where proposals will be expected to facilitate and contribute to the delivery of this infrastructure. TfL request a commitment to identifying and protecting land for enhancing rail capacity although this could usefully be expanded to refer to public transport capacity so that it included bus garages and standing facilities. LBB agree a Proposed Modification to TRC02 as follows.

*a) The Council will in particular ~~support~~ **facilitate and support contribution to** the delivery of key new transport infrastructure, including (but not restricted to):*

[...]

*iii. **An upgraded and enlarged Colindale** ~~new~~ **Underground station and enhanced public transport interchange at Colindale;***

*iv. A new **London Overground** passenger rail line, ~~the West London Orbital Line~~ together with upgrades to existing stations (Cricklewood and Hendon and new station at Brent Cross West) ~~on the line;~~*

Policy TRC03 – Parking Management

7.3 **Section 11.12 Parking** – TfL SP request this section is amended to reflect a more positive approach. Reference in para 11.12.6 to ‘meeting parking requirements’ is inappropriate when referring to maximum parking standards, as such language implies minimum rather than maximum standards. The London Plan is clear that minimum standards for residential uses must be evidence-based and are not appropriate outside

of PTAL 0-1 in outer London. As such, TfL consider there should be no minimum requirement for parking as per London Plan policy T6.1. This is a point of disagreement as LBB considers that the reference to 'parking requirements' does provide an appropriate way of approaching the assessment of car needs.

- 7.4 TfL have significant concerns about the use of the term 'orbital PTAL' and so welcome the more nuanced approach which uses a range of measures of connectivity set out in para 11.12.2. However, TfL requests the removal of the requirement in para 11.12.3 to measure the level of orbital access to determine parking requirements in PTAL 5 or 6. This is not considered to be a robust, objective measure and so it could be open to inconsistencies and challenge. TfL's concerns are based on an understanding of the proposed measure that bus routes are subjectively excluded on the basis that 'radial' bus routes travel towards central London. However, just 4 per cent of Barnet residents' bus trips are to central London, while 90 per cent stay in outer London, demonstrating that buses are predominantly used for local trips, regardless of the direction of travel. On this evidence, PTAL is a robust measure on which to assess connectivity in Barnet, as it is based on the public transport residents actually use. Furthermore, if the strategic road network, town centres or high streets in an area are configured in a radial direction, it will necessarily mean that buses travel in a radial direction to serve and connect local centres for at least some of their route. These services may be vital to residents and should not be discounted based on historical patterns of development. This is a point of disagreement as LBB considers that paras 11.12.2 and 11.12.3 do provide an appropriate way of assessing car parking requirements.
- 7.5 TfL welcome the requirements that 'Cycle parking is to be delivered in accordance with London Plan Standards set out in Policy T5 Cycling' and the London Cycling Design Standards (LCDS) in 11.12.10 to ensure the right quality as well as the right quantity of parking. TfL also welcome requirements for car club parking and membership – car clubs should ideally be used to reduce the levels of parking for privately owned cars, with total provision within London Plan maximum standards (i.e. car club spaces should count towards the maximum allowed). This is to avoid car clubs creating additional vehicular dominance and to ensure that car clubs are made viable.
- 7.6 LBB highlights that the Mayor has not raised this as an issue of general conformity with the London Plan. London is a diverse city where a flexible rather than 'a one size fits all' approach can respond to its spatial differences. LBB considers that the improvement of orbital connectivity of bus services within Barnet is vital if suitable alternatives to the private vehicle are to be effective. LBB welcomes news that TfL has jointly commissioned a Bus Study with Barnet, part of which will look at orbital travel. LBB considers it reasonable to expect developers in PTALs 5 and 6 to work out the level of orbital access for their site in order to determine the requirements for car parking provision. While TfL recognises the importance attached to orbital links by LBB this is an area of significant disagreement between the parties about the need to measure orbital access (as opposed to use of existing tools that can measure 360 degree access) and TfL considers that this is an arbitrary measure which could establish a damaging precedent.
- 7.7 LBB and TfL agree that Table 23 is now broadly in line with Table 10.3 in the London Plan 2021. The standards in Table 23 differentiate between 1 – 2 bed and 3+ bed units in most areas and set a lower maximum for 1 – 2 bed units in PTAL 0 – 1 than the London Plan. This is consistent with the footnote to Table 10.3 in the London Plan

which states that 'Where development plans specify lower local maximum standards for general or operational parking, these should be followed.' TfL support the footnote to Table 23 requiring residential development in metropolitan and major town centres to be car-free, and for development in outer London Opportunity Areas to have no more than 0.5 spaces per dwelling on average.

7.8 TfL SP and LBB agree that the residential parking standards in the draft Local Plan are in conformity with the London Plan.

7.9 TfL and LBB agree that the footnote to Table 23 should be modified. TfL has proposed alternative wording which removes the reference to calculating orbital access and states 'Where public transport connectivity does not provide access from all directions of likely demand, minimum parking for car club schemes will be considered along with...' However, this wording is not accepted by LBB and so LBB sets out a proposed modification as follows:

- ! Where the orbital **access by public transport is calculated as** ^{PTAL} is 4 or less minimum ~~minimal~~ parking for car club schemes will to be considered **along with contributions towards improving bus services and CPZs (this does not preclude the Council from requesting contributions towards other appropriate transport related projects in the area or override the CPZ requirements for other parts of the Borough).**

8.0 Annex 1 – Schedule of Site Proposals (Allocated Sites)

Sites 4, 5, 15, 22, 23, 24, 27, 30, 32, 33, 34, 35, 39, 47, 53, 55, 58, 61, 62, 64

8.1 These sites all make reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. TfL SP consider that any assessment of 'need' should take into account that the availability of parking creates demand for it (induced demand) and also factor in the extent of alternatives including public transport and active travel for accessing the site in question. Planning for a sustainable London must be based on demand management rather than predict and provide. LBB refers to previous references above to its approach on car parking and willingness to make proportionate policy changes in response to TfL SP representations. LBB considers that the wording provides a balanced approach to car parking provision for any proposal coming forward at these sites. Although TfL welcomes the proposed changes to policies, it believes that this must also be reflected in the wording for individual site allocations by removing potentially misleading references to parking 'requirements' or 'needs' or statements that replacement parking spaces are required without any qualification.

Site 8: Edgware Underground and Bus Stations, Edgware

8.2 TfL support the requirement for bus operations and the function of the bus station to be protected or re-provided as part of any redevelopment and that London Underground infrastructure and operations must also be maintained.

Site 30: Finchley Central Station, Finchley Church End

- 8.3 TfL support the requirement that the development should reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists.

Site 33: Bunns Lane Car Park, Hale

- 8.4 TfL support the use of residents' only parking controls to ensure that there is no 'overspill' parking.

Site 43: Army Reserve Depot, High Barnet

- 8.5 TfL SP highlight that any improvements to road junctions should follow the Healthy Streets Approach. LBB agrees a Proposed Modification to the Site requirements and development guidelines as follows:

Improvements to streets and the public realm should be delivered in line with the Healthy Streets Approach.

Site 44: High Barnet Station, High Barnet

- 8.6 TfL SP support the requirement that development must reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists.

Site 46: IBSA House, Mill Hill

- 8.7 TfL SP support potential for development to increase traffic must be assessed and mitigated.' This may require public transport or active travel improvements as well as offering alternatives to car ownerships.

Site 53: Allum Way, Totteridge

- 8.8 TfL SP support safeguarding of a portion of the site for new London Underground infrastructure required for a potential future upgrade of Northern Line services and the statement that station functions are to be maintained.

Site 55: Woodside Park Station East, Totteridge

- 8.9 TfL SP support the continuation (and if necessary, extension) of local parking controls.

Site 61: Tally Ho Triangle, West Finchley

- 8.10 BB and TfL agree that any proposals that affect the continued operation of the bus station would need to be the subject of early discussion with TfL London Buses and consistent with London Plan Policy T3 on protecting and safeguarding operational transport land.

Site 62: Tesco Finchley, West Finchley

- 8.11 LBB and TfL SP agree that car parking at this site should be minimised and development should encourage a modal shift towards sustainable transport.

Site 67: Great North Leisure Park, Woodhouse

- 8.12 LBB and TfL SP agree that proposals should include measures that contribute towards modal shift away from private car use to more sustainable means of transport.

9.0 Governance arrangements

9.1 This SoCG will be kept up-to-date and will form a key part of implementation of Local Plan policies and any future Local Plan review.

10.0 Signatories

10.1 Both signatories agree that this statement is an accurate representation of areas of agreement and disagreement between the two parties.

Signed:

Signed:



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Position: London Plan and Planning
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Transport for London Spatial Planning

Date: 01/04/2022

Date: 07/04/2022