

Barnet Local Plan Examination in Public Transport for London (Spatial Planning) – Matter 6 Written Statement

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?

1. Yes - Reducing car parking in well-connected locations 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.
2. Town centres and public transport hubs are, by definition, locations that provide greater access by sustainable modes and availability of parking in these locations results in unnecessary car journeys when they would be practical to make by sustainable modes. When parking is removed, other modes become more attractive, particularly because less car use results in less congestion, improved safety, more viable public transport and a more attractive environment for walking and cycling. Bus services converge in these locations and retention of parking spaces for Blue Badge holders, taxi ranks and drop off bays ensure that access needs are met. Also, space is freed up to provide higher quality public realm. Redevelopment of car parking, particularly for high-quality residential and mixed-use developments, increases the number of people within town centre/transport hub catchments, thus increasing vitality sustainably.
3. London Plan Policy (LPP) SD7(C2) encourages boroughs to recognise the capacity of car parks for housing intensification and mixed-use

redevelopment. This is expanded upon in Policy H1¹ which identifies well-connected sites, car parks, low-density retail parks and supermarkets as some of the most important sources of housing capacity.

4. According to recent evidence from DfT,² redeveloping town centre parking is suggested as a way to deliver mode shift in practice.
5. Policy T6 A states that: ‘*Car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity.*’ Car parks in town centres and at transport hubs will generally be well-connected and offer a wide choice of alternatives; therefore, it is appropriate to reduce parking in these locations where there is often a legacy of over-provision.
6. The draft Sustainable Transport, Walking and Cycling London Plan Guidance was consulted upon in 2021 and is due to be published shortly, subject to Mayoral approval³. In the section on ‘Car parks and other surplus transport land’, it states that Development Plans should identify opportunities arising out of declining car use to redevelop land, including car parks, which could be used more efficiently and support sustainable mode shift.⁴⁵

¹ Policy H1 identifies ‘sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary’ and ‘mixed-use redevelopment of car parks and low-density retail parks and supermarkets’ as two of the most important sources of capacity.

² ‘Impact of interventions encouraging a switch from cars to more sustainable modes of transport: a rapid evidence assessment (REA)’ (<https://www.gov.uk/government/publications/switching-to-sustainable-transport-a-rapid-evidence-assessment>) 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.’

³ The proposed publication document will be shared with inspectors separately for reference.

⁴ ‘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. The number of car driver trips in London has reduced from 6.8m in 2000 when the office of London Mayor and TfL were created, to 5.8m in 2019. The number of shopping trips by car the average Londoner made fell by over a third between 2006 and 2016. This has contributed to more cases of car parks being converted, as set out in TfL’s note on case study material on redevelopment of car parks.’

⁵ The TfL note referenced in footnote 4 can be submitted as evidence to the Inspectors if helpful and is available at <https://content.tfl.gov.uk/advice-note-4-case-studies-of-car-park-reuse.pdf>

7. Barnet declared a climate emergency in May 2022. TfL analysis has found that car-free housing in well-connected locations would reduce carbon emissions by 730tCO₂ per 1,000 homes per year. Journeys to town centres and transport hubs being made by sustainable modes that had previously been made by car would reduce carbon emissions of 50-80% if made by public transport and by 100% if made by walking and cycling.⁶
 8. TfL has evidence from London Underground station car park surveys in north London that shows nearly all car park users are within reasonable walking distance of an alternative Underground/rail station or bus stop on a direct route serving the station, and there are often vacant spaces in the station car parks, even at peak times. This indicates that use of the sites as a car park is an inefficient and inequitable use of valuable land with development potential.
- e) Are the Council’s proposed modifications necessary for soundness to clarify expectations of development proposals, to demonstrate when parking spaces are surplus to requirements or should be replaced, and in terms of assessing amenity impacts?**
9. The proposed modification to GSSI 2 was agreed with TfL in our Statement of Common Ground (SoCG) (MMI 09) and amends clause b) to read: *‘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’*. This modification is essential to ensure that the approach to replacement car parking is consistent with LPP T6 and the Mayor’s Transport Strategy (MTS). LPP T6(L) states that *‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.’* This is needed to deliver Good Growth and the London Plan as a whole. It reflects a global trend for cities to move away from car travel towards more sustainable and space-efficient modes. Without this, growth will result in unacceptable impacts on the quality of life for Londoners.

⁶ Ebikes result in marginal carbon emissions due to electricity supply not being fully renewable, but emissions are minimal

3) Policy TRC01 seeks to encourage sustainable and active travel to support a growing population and prosperous economy, in that regard:

a) Are the Council’s proposed modifications in terms of its role in enabling active travel, referencing the Mayor of London’s Vision Zero ambition and to ensure consistency with national policy in terms of circumstances where development will be prevented or refused, required for soundness?

10. TfL supports proposed modifications MM290 and MM292 which refer to Vision Zero and are consistent with the London Plan and MTS.

11. However, we object to proposed modification MM293 which removes the reference to Transport Assessments setting out how the proposals mitigate negative impacts on the transport network.

12. Paragraph 110(d) in the NPPF is unambiguous that assessing sites involves identifying mitigations to make developments acceptable. The modification would weaken the assessment requirement in TRC01 and make it more difficult to secure adequate mitigation for transport impacts to make development acceptable in transport terms.

13. The original wording was consistent with LPP T4 (C)⁷. TfL’s guidance on Transport Assessments also makes it clear that mitigation should be provided to address negative impacts.

d) Are the requirements for all major development proposals to provide transport assessments and travel plans, construction traffic management plans / construction logistics plans and delivery and servicing plans, and parking management plans, as set out under part c) and put forward in the Council’s proposed modifications, consistent with national policy? Why does the approach indicated in paragraph 11.11.1 appear to be different and is there any specific justification for the respective approaches taken?

⁷ London Plan Policy T4 (C): ‘Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.’

14. The requirements for all major development proposals to provide transport assessments and travel plans, construction traffic management plans/construction logistics plans and delivery and servicing plans, and parking management plans, as set out under part c) and in modification MM294 are consistent with LPPs T4, T6 and T7, which have been found sound. However, as stated in answer to a) above, proposed modification MM293 would result in Transport Assessments failing to meet the assessment requirements of NPPF paragraph 110 (d) and LPP T4.

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?

15. Yes, this has been agreed in our SoCG and provides important clarification of the scope of the proposed station improvements.

b) Amended wording of part a) iv) to address Transport for London representations regarding ‘a new London Overground Passenger line’?

16. Yes, this has been agreed in our SoCG and provides a more accurate description of the proposals.

6) Policy TRC03 relates to parking management and associated expectations of development, in that regard:

a) Is the approach of the policy justified and effective insofar as it seeks to depart from Policy T6.1 of the London Plan with respect to residential parking and to alternatively provide maximum residential parking standards in accordance with Table 23?

17. As stated in our SoCG, we agree that the proposed parking standards set out in Policy TRC03 and Table 23 are in conformity with the London Plan 2021. This includes the proposed standard for 1-2 bed dwellings in PTAL 0 – 1 which apply a lower maximum standard (1.25) than the London Plan (1.5).

18. As stated in LPP T6(K), '*Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported...*' It is important to note that the London Plan applies maximum car parking standards which allow flexibility to apply more restrictive standards at the local level. Therefore, setting a lower maximum standard for a specific category is consistent with the London Plan. Many boroughs have done this, setting lower standards to reflect local conditions.

19. However, we are concerned that some of the accompanying text could better reflect the London Plan's approach to parking. In particular, references to parking 'requirements' or 'needs' should be qualified and relate only to disabled persons' and operational parking.

c) Is the definition of 'car free development' as referred to in part c) sufficiently clear in the Plan?

20. LPP T6B states that '*Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.*' This is the context for the definition of 'car-free development' used here and elsewhere in the Plan.

d) Is the approach of paragraph 11.12.6 justified in indicating that the Council would show flexibility in the assessment of parking requirements? If so, should the approach be reflected in the policy wording for effectiveness?

21. No. As set out in our SoCG, some of the accompanying text to Policy TRC03 is inconsistent with the approach to maximum parking standards in the London Plan and Policy TRC03 itself. Although we welcome flexibility in applying greater levels of parking restraint, this should be in the context of *maximum* standards and there should be no *minimum* parking. The reference in paragraph 11.12.6 to '*meeting parking requirements*' is inappropriate when referring to maximum parking standards, as such language implies minimum rather than maximum standards. LPP T6 is clear that any minimum standards for residential uses must be evidence-based and are not appropriate outside of PTAL 0-1 in outer London. As such, there should be no minimum 'requirement' for parking. References to 'parking requirements' in paragraph 11.12.6 and elsewhere should be removed.

22. We also object to a portion of proposed modification MM296 which inserts a new paragraph 11.12.7a introducing further flexibility in the application of parking standards without qualification or justification. ’
23. If the need for flexibility must be stated, this should be qualified by stating that a flexible approach to parking ratios in the early phases of large-scale development must still ensure that provision does not exceed maximum parking standards and that there is an enforceable commitment to parking restraint in later phases so that the overall quantum of parking does not exceed the maximum standards. The wording does not currently provide for this and therefore risks undermining the application of *maximum* parking standards in TRC03 and Table 23.
- e) Are the following requirements justified and if so, should they each be included in the policy wording for effectiveness:**
- i. Paragraph 11.12.3 seeking developers in PTALs 5 and 6 to establish the level of orbital access by public transport to determine car parking requirements;**
24. No. This is an area of dispute with TfL, as recorded in our SoCG. This requirement is inconsistent with LPP T6 which requires development at PTAL 5-6 to be car free (apart from Blue Badge parking). It also contradicts Policy TRC03 and Table 23 of the Plan.
25. TfL has engaged extensively with Barnet officers on this issue and has been clear that we do not accept the concept of orbital PTAL, nor the methodology on which it is based, which we do not consider to be robust nor objective. We have strongly recommended that all references to ‘orbital access by public transport’ or ‘orbital public transport’ be removed from the footnote to Table 23 and accompanying text.
26. As stated previously, all references to car parking ‘requirements’ in the text should be removed as they are inconsistent with maximum parking standards set out in Policy TRC03 and Table 23.

Historic development patterns

27. The measure does not account for historical patterns of development in Barnet where towns developed along radial roads and railways. Today, most town centres are oriented along these radial corridors with few exceptions. Of the 15 major and district town centres in Barnet, 13 are radially-oriented including Edgware which initially developed along Edgware High Street before developing east along Station Road. While local centres are less likely to be radially-oriented due to their local nature, some local centres are still located along key radial corridors. This results in many local connections being along radial corridors, along which many buses travel. The road network in Barnet is now relatively fixed with few orbital strategic roads (see Figure 1). Indeed, the only orbital road on the TLRN or SRN is the A406.
28. Furthermore, the Green Belt in Barnet acts as a green wedge separating built-up areas in the borough. Travel to local amenities for people living in Barnet is therefore more likely to be convenient and attractive along the established routes which provide access more quickly, reducing the need to travel long distances. TfL is committed to work with Barnet and others to assess the feasibility of the West London Orbital, which will offer additional rail access if delivered.

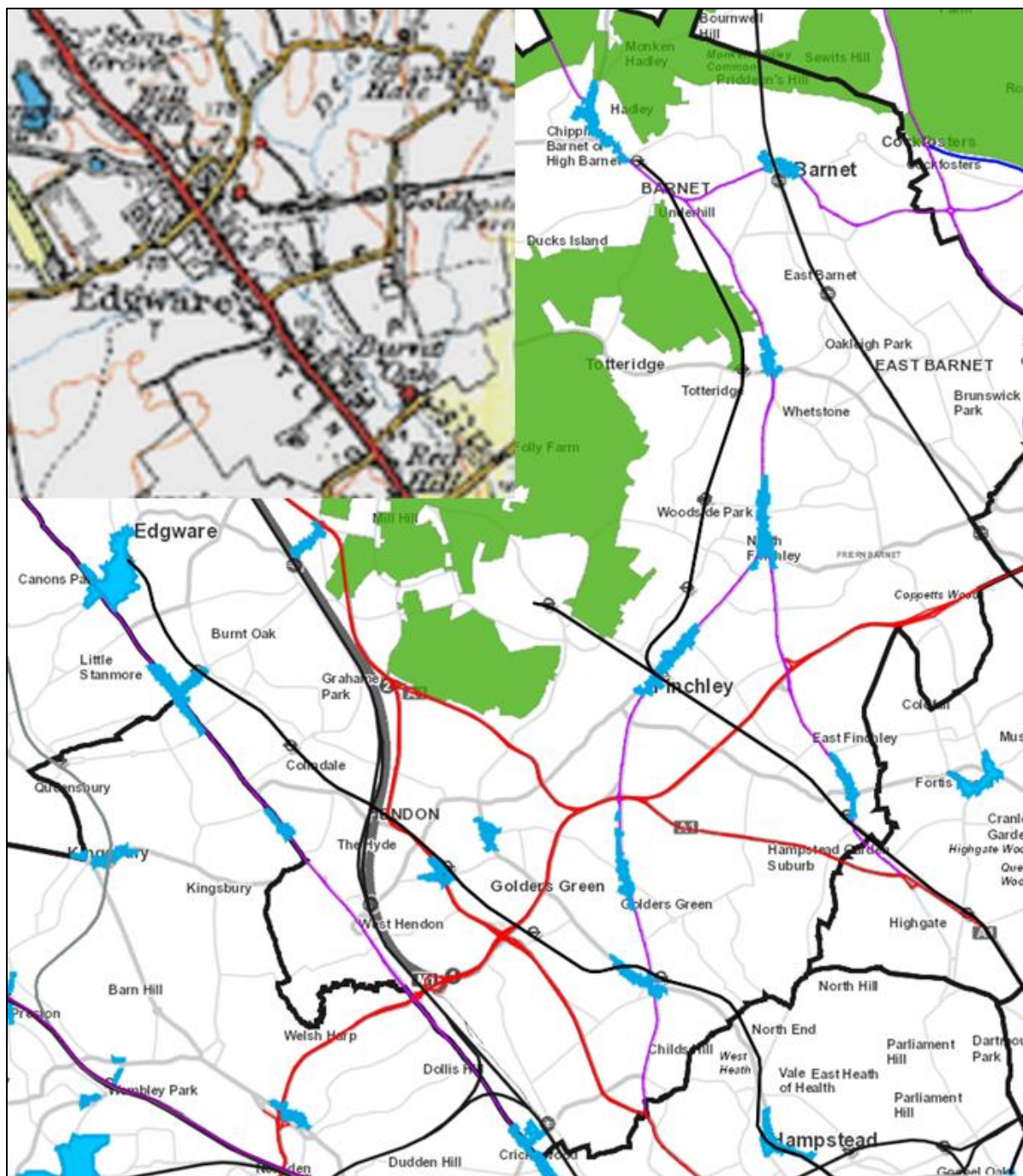


Figure 1 - Map showing town centres in relation to TLRN (red), SRN (purple), rail network and Green Belt. Top left: Historic OS map of Edgware, 1920.

Public transport network

29. Figure 2 shows the bus network in Barnet. The number of passenger kilometres travelled tends to be higher along radial corridors (Figure 4). With most bus journeys originating in Barnet, also ending in Barnet, this does not represent people going into central London. While one of the justifications

given by the Council for an orbital access measure is slow journey times, buses actually tend to operate at higher average speeds along orbital rather than radial corridors (Figure 3). The higher demand on existing radial rather than orbital routes may be partly attributable to higher frequencies but could equally be related to the density of key destinations along these corridors.

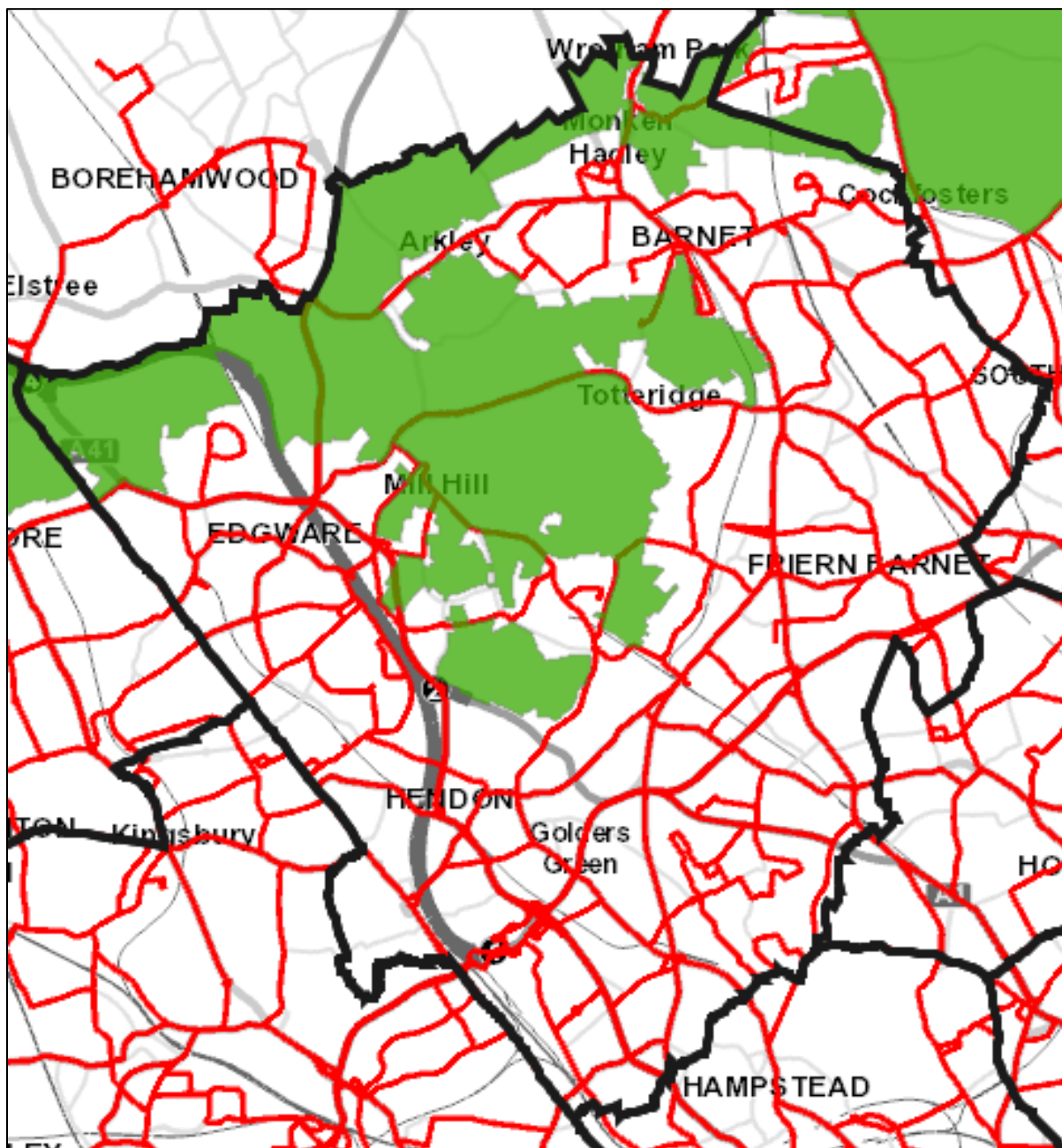


Figure 2 - Map of the bus network in Barnet.

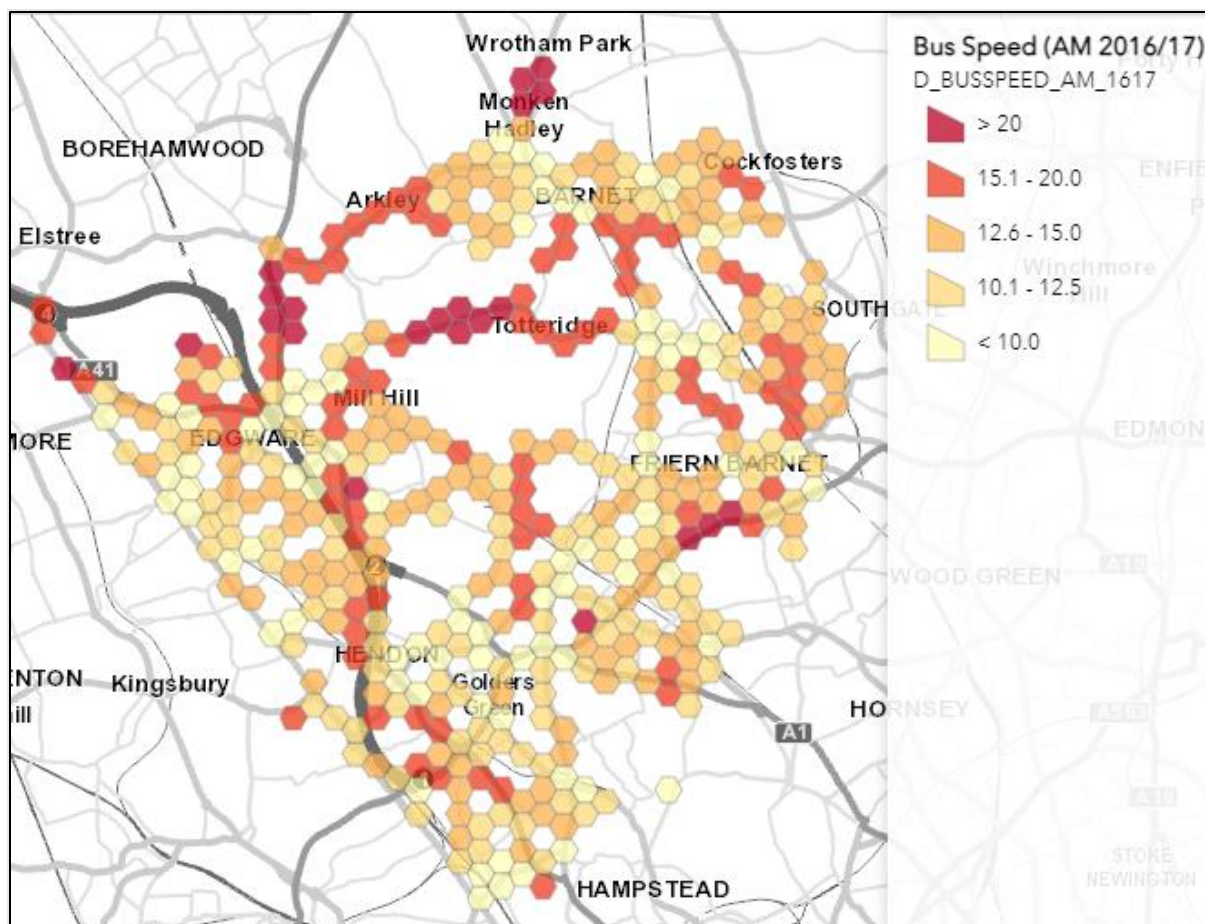


Figure 3 - Average bus speeds in Barnet (mph)

30. If we look at the corridor from Golders Green to Finchley which connects the branches of the Northern line. If the orbital access measure were applied to this corridor, it would be assessed as a highly radial route, as would the more frequent of the two bus services serving that route (Route 13) which mis-characterises the role it plays and demonstrates the arbitrary and unconvincing nature of the orbital access measure, discussed further below.

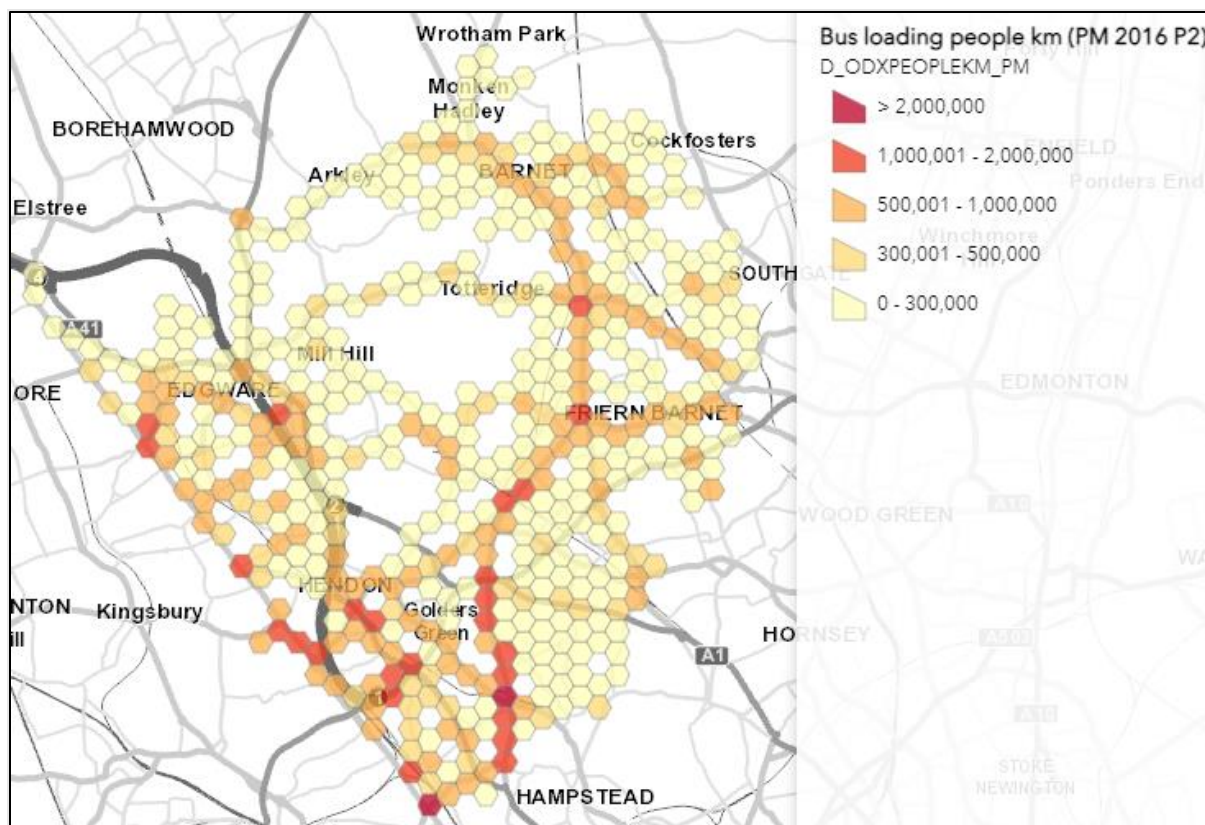


Figure 4 - Bus loading, people kilometres

31. It is notable that there is a higher level of bus provision in town centres relative to demand (Figure 5), with the network oriented to provide access to town centres (and transport hubs) from a wide range of areas, meaning, in turn, that future residents within these hub locations will be able to easily access most places in the borough without a car.

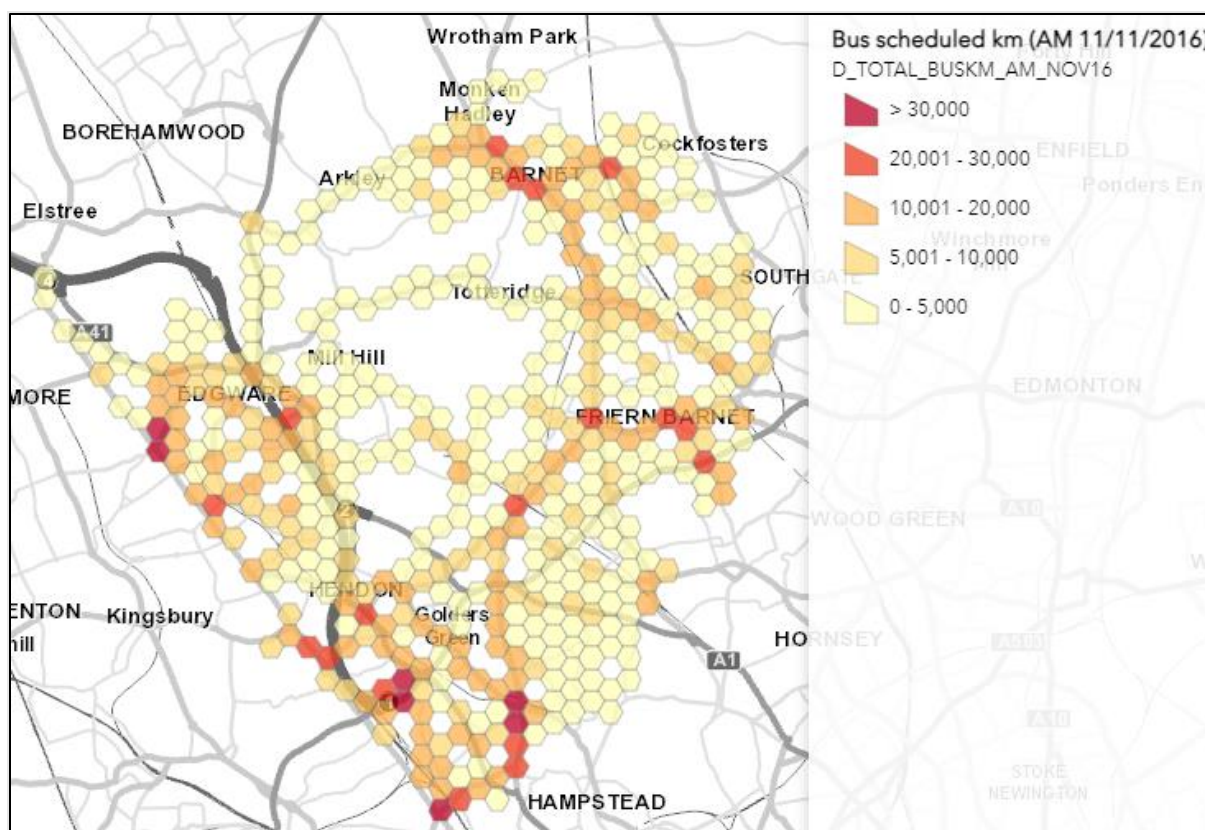


Figure 5 - Scheduled bus kilometres AM peak

32. The bus network is designed to best meet demand in a cost effective way and the flexibility of the bus network allows it to be fairly quickly modified based on identified / changing need, such as through the planning process. TfL welcomes Barnet’s ambition to improve public transport in the borough and would welcome continued discussions on how to realise the ambition for improved speed, reliability and frequency on bus services.
33. Conversely, the premise of an orbital public transport access measure - particularly if used to permit car parking above London Plan maximums - would fundamentally undermine this, as well as the shift towards active travel. Where a gap in provision for orbital travel is identified in the planning process, the council should take a positive approach seeking to address this gap, in collaboration with TfL, by improving walking and cycling infrastructure as well as contributing towards higher public transport service levels and improved reliability, such as through bus priority measures.

Orbital PTAL methodology

34. We have significant concerns about the objectivity of the methodology for orbital PTAL. It is not possible for planners or applicants to consistently assess the relative ‘orbitality’ of trips enabled by a bus route given that bus passengers are able to alight anywhere along the route and have necessarily walked or travelled by other means at either end of the bus journey. To suggest a bus is not useful for a resident of a new development and weight the PTAL calculation based how orbital a route is without any substantive evidence that this is the case, is unacceptable. For example, if a bus route adjacent to a new development served several local schools, a supermarket and a hospital, but it was considered predominantly radial, would it be reasonable to characterise it as lacking utility? This proposed approach also risks a harmful precedent which erodes the link between the acceptability of car-free living and the provision of significant levels of public transport services.
35. Furthermore, there is strong evidence that trip making patterns by people with access to a car are distinct from those without access. This means that car-free households will travel to destinations that are accessible by active travel or public transport, while people with access to a car will make more diffuse trips. The fundamental principle behind the requirement for developments in locations PTAL 5-6 to be car-free is that there are sufficient means of car-free travel to meet daily needs. This principle underpins the strategic approach to accommodating growth and improving quality of life in both the London Plan and MTS and is fundamental to their delivery.
36. We are concerned that Euston has been arbitrarily chosen as the centre point for the purposes of calculating how orbital each route is on the basis that all branches of the Northern line meet here, however this is also true of Camden Town, and to a degree, Kennington which is now a Zone 1/2 station. Traditionally, the centre point of London is Trafalgar Square, while the geographic centre of Greater London is located just south of Coral Street in Waterloo (SE1 7BB).
37. The measure does not account for where Barnet residents travel. Over 90% of Barnet residents’ bus journeys are to destinations in outer

London, and more than half of bus trips starting in Barnet also end in Barnet, which underlines how the bus network is mostly used for local journeys, regardless of the direction of travel. Much of this demand occurs on radial corridors, as discussed above. We do not therefore accept that the rationale or the methodology for orbital PTAL are robust.

38. Beyond the robustness of the measure, it is also unduly complex, opaque and impractical for use as a planning tool. As shown in Appendix A of the 'Car Parking Study Review 2021' (EB_T_08), this would require multi-step calculations, including a trigonometric calculation, for each public transport route. While a tool could be created to automate the calculations, additional steps and manual work would still be required to pull out data for each public transport route in a PTAL report, as well as collecting OSGB coordinates for the start and end points of each route. Equally, the bus network is kept under continuous review by TfL, with meetings to discuss potential changes held regularly. The potential for changes to routes could present an additional difficulty in ensuring planners and applicants have up-to-date information.

PTAL

39. PTAL is a defined and accepted measure which is set out in the London Plan, TfL guidance and is in wide use by developers and boroughs across London. Tools are freely available to calculate and check PTAL for any location through the TfL WebCAT portal so that results are transparent and cannot be challenged. The PTAL measurement takes full account of access in any direction giving equal weight to orbital and radial travel. There is no agreed definition of 'orbital public transport' in isolation as most bus routes involve some sections that could be described as radial and others that could be considered orbital. As a result, there is no agreed method to measure 'orbital public transport', and it is not a requirement of any other Local Plan.

Conclusion

40. To avoid confusion, we reiterate our repeated request to remove references to 'the level of orbital public transport' in paragraph 11.12.3 and the reference to a calculation of 'orbital access by public transport'

which is part of the proposed modification to the footnote to Table 23 (MM 298).

41. The requirement in paragraph 11.12.3 would fail the test of reasonableness and should be struck out of the Plan. Retaining this requirement is likely to lead to dispute between parties; it will not provide clarity or certainty and it could be used to block otherwise acceptable development in the most well-connected locations.

iii. Paragraph 11.12.8 requiring a car parking design and management plan for all applications which include car parking.

42. Yes, this is consistent with LPP T6(J).⁸

f) Is the policy sufficiently clear and effective in part d) for decision making on development proposals seeking to reduce the availability of on-street parking?

43. No, a requirement to demonstrate that sufficient car parking will remain in an area to serve local ‘needs’ could prevent otherwise acceptable development. Policies in the London Plan, MTS and Barnet Local Plan are designed to reduce car use and encourage use of sustainable modes. One of the greatest barriers to achieving this is the retention of on-street parking spaces that could be better utilised to meet future (rather than historic) needs. Reduced availability of on-street parking should be encouraged where removal of spaces does not cause unacceptable harm.

i) Would any other changes to the policy or its supporting text be necessary to achieve soundness?

44. As stated above, all references to parking ‘requirements’ or ‘needs’ should be removed as they are inconsistent with parking policies in the London Plan and MTS. Also, all references to ‘orbital public transport’ or ‘orbital access by public transport’ should be removed because there is

⁸ London Plan Policy T6 (J): ‘A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.’

no agreed definition. We agree that the footnote to Table 23 should be modified; however, in place of proposed modification MM298, which includes the confusing reference to calculating orbital access (see response to part e(i) above), we suggest that the footnote should read: *‘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...’*