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Dear Barnet Planning,

### **Local Plan Regulation 19 consultation - response**

CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners. We have many members in Barnet and work closely with a number of them to support the protection and enhancement of green spaces.

***We believe that for the Local Plan to be considered sound, the following changes should be made.***

**Policy ECC04: We oppose the "low value, low quality" provisions in Policy ECC04 as it has no basis: it is a subjective judgement and, in any event, open and green spaces can be, and in the past have been, improved to deliver important local amenity. Policy should seek to protect and enhance all open, green and play space in the borough with a presumption against development, to ensure the borough can meet the standards proposed now and in future.**

- This element of the policy should be replaced with a strong statement supporting protection and enhancement of all green spaces to meet needs.

### **POLICY GSS13: Strategic Parks and Recreation – more specific proposal for regional park needed**

A Regional Park for Barnet based on the Green Belt is very much supported however the draft plan does not include specific proposals on how and when it will be delivered.

- We propose a clear statement should be included in the Local Plan stating on how this is to be progressed including adding it to the key diagram, proposals map and identifying the resources to create it in the Draft Barnet Infrastructure Delivery Plan.

### **Areas of open space / play space / green space deficiency: opportunity to create 'StreetParks' and 'EstateParks' and parklets**

Many residential streets have become unplanned car parks but it is possible to create safe, pleasant places for play and recreation simply by closing a street, or part of a street, to traffic and introducing greenery, seating or interest. The 'Grey to Green' movement also helps manage increased extreme rainfall and high temperature events. This type of intervention can be low cost if bollards are used. Then the local community can help with greening or other interest.

Housing estates often allocate space to parking unnecessarily or with poor layout and a StreetParks policy can also promote better use of space within housing estates to create space for play, recreation or other amenities like secure cycle parking.

- We propose the plan includes a new policy to promote the transformation of parts of streets and estates into 'StreetParks' in areas of deficiency of open space / play space / green space.

**Policy TOW01 Vibrant Town Centres** – We support improvement of public realm and planning around sustainable transport.

- This policy should state explicitly that that town centre policy is underpinned by reducing car dominance in the town centre; and promoting sustainable travel to / from the town centre.

**Promotion of health and wellbeing** – the starting point for this needs to be underpinned and linked to transport policy i.e. to support active travel and modeshift away from cars as this is one of the most important ways to promote active lifestyles, key to health and wellbeing.

**Policy TRC02 – Transport Infrastructure** – no mention of shared mobility hubs or space for cycle infrastructure.

- This policy should include specific provision to reflect the spatial needs of a move to active travel and shared and electric mobility; as well as a move to consolidated goods delivery.

**Policy TRC03 – Parking Management – needs to discourage private car ownership**

- Parking standards are too high: one third of Barnet households currently do not own a car and the council should be looking to reduce this further in line with transport strategy. There should be a presumption in favour of zero car or 'car lite' (0.3 spaces for household) development as per the London Plan and no requirement for developers to provide the high levels of parking stated which will encourage private car ownership and in direct contradiction of the need to reduce private car use. Instead there should be a presumption in favour of public transport, walking and cycling. In areas of low PTAL, developers can work with car clubs to ensure availability of shared cars. The council can also ensure there is suitable cycle infrastructure and work to improve PTALs/public transport.
- Introduction of Controlled Parking Zones and potential impact on front gardens: We propose a new policy opposing use of front gardens for car parking as well as opposing any new Domestic Footway Crossovers, to underpin a move to sustainable modes of transport. This is particularly important to support the introduction of Controlled Parking Zones, which are a vital tool to reduce car trips, but which might encourage householders to park in their front garden to avoid costs and controls, which would remove the ability of the council to effectively manage parking and also create an unattractive and dangerous streetscape.
- Promote car share as an alternative to car ownership. It is essential to define policies which will promote car share as a means to reducing private car ownership in line with the London Plan.

Yours sincerely,

Alice Roberts  
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CPRE London