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9 August 2021

Dear Sir/Madam,

**Re: Barnet Regulation 19 draft local plan**

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment on Barnet's draft local plan. As you are aware, the London Plan 2021 has just been published and now forms part of the Development Plan.

We strongly welcome your aspiration to support growth in Barnet while enabling a greater mode share for walking, cycling and public transport use. In particular, we welcome the ambitions set out in the draft local plan to: reduce car use and achieve mode split targets, implement the Healthy Streets Approach and achieve the Mayor's Vision Zero ambition. We are pleased to see the plan's recognition of the importance of active travel in improving health outcomes and the role reducing car journeys has in improving air quality.

We commend you on the considerable progress you have made in developing car parking standards that will make growth in the borough more sustainable, taking into account the extent of alternatives in different locations. As a result, the parking standards are now in conformity with the London Plan 2021. We do however have concerns that some of the accompanying policy text and site allocations need to be updated to reflect the 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 the reliance on assessing orbital travel has been modified slightly, we continue to have concerns about using a

connectivity measure that could be open to challenge or used inappropriately. We would like to see the need to measure orbital travel when considering parking requirements removed entirely.

We welcome your support for delivering improved public transport capacity and infrastructure in the borough including protection of transport land and where there are opportunities to do so, contributions towards provision of step-free access and capacity enhancement.

We also welcome your support for the West London Orbital rail scheme, which will improve public transport connectivity within Barnet and to neighbouring boroughs. However, it may be prudent to adopt more cautious wording about its delivery to reflect the fact that the scheme remains unfunded at the present time. We would emphasise the importance of the approach above to maximising sustainable travel and minimising provision for car use to making the business case for the scheme as strong as possible. We also welcome the support given to Crossrail 2 and the major benefits the scheme could bring to Barnet and to New Southgate in particular.

We strongly welcome your ambition for improved public transport connectivity in the borough, including through buses. We are keen to continue this discussion to identify how best to achieve this, including identifying where the most significant connectivity gaps currently exist, which may not be purely radial nor orbital. We urge you to ensure developments play their role in supporting higher levels of services and improved reliability, such as through bus priority measures.

Our responses to specific points in the draft Local Plan are set out in more detail in the attached appendix. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Barnet and across London.

Yours faithfully,

**Josephine Vos | Manager**

**London Plan and Planning Obligations team | City Planning**

Email: [REDACTED]



## Appendix: Specific suggested edits and comments from TfL on the Barnet Reg. 19 draft local plan

Section	PDF page	Track change/comment
Key Diagram	31	We welcome the amendment to the Crossrail 2 route which is now shown correctly terminating at New Southgate.
Policy GSS01 Delivering Sustainable Growth	41	The wording in relation to new public transport infrastructure has been amended from the Reg. 18 draft and suggests there is now more certainty about delivery of West London Orbital than is actually the case. Although work is continuing there is still uncertainty about funding and timescales for delivery and so we suggest it is altered to read as follows 'Major new public transport infrastructure is delivered at the new Brent Cross West station and <b>as part of a potential</b> West London Orbital <b>rail line</b> , with <b>longer-term</b> potential for Crossrail 2, subject to confirmation.' In view of the above, the assessment of potential for new homes at existing and major new public transport infrastructure in part c should take account of the possibility that there could be delays to delivery of the named transport projects. There may be additional scope to develop in and around existing stations while not being dependent on the delivery of specific projects.
Policy GSS02 Brent Cross Growth Area	49	We welcome the Council's commitment to delivering Healthy Streets in the Brent Cross growth area. We also welcome the addition of a reference to delivering step-free access improvements to Brent Cross Underground station as part of new development in the area.
Policy GSS03 Brent Cross West Growth Area / Policy GSS04 Cricklewood Growth Area	53 / 56	<p>We welcome the addition of specific references in both policies to supporting development proposals that facilitate access to and delivery of the West London Orbital.</p> <p>We welcome that the Council will request 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. As requested previously we ask that in policy GSS03 the Council include potential contributions toward delivery of the West London Orbital scheme as well.</p> <p>Similarly, we repeat our request that in policy GSS04 the Council seek contributions towards new/improved</p>

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		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 / 4.16.3-4	59	<p>TfL would welcome continued engagement with the Council in implementing the Supplementary Planning Document to help unlock the growth potential of Edgware town centre.</p> <p>We strongly support the Council’s ambition to improve transport interchanges and the public realm in Edgware through new development. As previously requested, this policy should set out more clearly what will be expected from development proposals in and around the town centre in terms of contributing towards these improvements, for example provision of additional town centre cycle parking, station cycle parking, and Healthy Streets improvements.</p> <p>We 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. However, we would question the emphasis on the stations’ role in congestion without reference to reducing incentives to drive. Improving public transport alternatives will also be important for reducing congestion, including through bus priority and protecting land used for transport. We would welcome further discussions with the Council 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. Regeneration of the town centre that involves transport land consolidations should focus first on reducing inefficient uses of land, such as car parking.</p> <p>TfL will strongly support a car-free approach to growth and regeneration in the town centre.</p>
Policy GSS06 Colindale Growth Area/4.19.4	62	We welcome inclusion of additional wording which sets out that all development within 1 km walking distance of Colindale station will be expected to contribute towards station improvements, potentially including but not limited to delivery of step-free access and capacity enhancement, and provision of additional cycle parking and that new development in Colindale should deliver improvements to streets and the public realm in line with the Healthy Streets Approach as well as measures to assist bus services including an expectation

Section	PDF page	Track change/comment
		<p>that new development will contribute towards bus priority improvements at junctions, provision of bus lanes along bus corridors, service frequency improvements, and/or supporting infrastructure including bus stations, bus garages and/or bus stands.</p> <p>We support the Council’s ambition to improve connectivity and reduce severance where possible. We strongly encourage the Council to continue to engage with TfL regarding provision of a new walking and cycle route under the Northern line to ensure that any potential impacts on the railway are minimised, mitigated and managed.</p> <p>We strongly welcome implementing on-street parking restrictions through a Controlled Parking Zone (CPZ) and are happy to work with the Council to implement this where appropriate.</p> <p>To better reflect proposals for Colindale station we suggest that the final bullet point on page 62 is redrafted to read as follows:</p> <p>‘Reconstruction and upgrading of Colindale Underground Station to increase its capacity and provide a step-free access station, along with additional cycle parking and facilitating the redevelopment of adjacent land owned by TfL and others.’</p>
Policy GSS07 Mill Hill East	64	We welcome the requirement for proposals to be supported by a transport assessment, but it should be made clear that this will need to take into account cumulative impacts from all planned and proposed development because the station has particularly limited capacity at its gates and staircases. This has been reflected to a degree in Policy GSS09 Existing and Major New Transport Infrastructure, but the specific reference in the policy on Mill Hill East would give greater support to the need to assess the impact of cumulative development around the station.
Policy GSS08 Barnet’s District	66	We support optimising density in town centres. We strongly welcome the supporting text of paragraph 4.21.7 and the additional reference to the Healthy Streets Approach in the policy text. We welcome the intention of

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Town Centres		part g of the policy to minimise parking provision including zero provision where appropriate and the amended wording which addresses our previous comments. We would also welcome working with the Council on any Supplementary Planning Documents relating to town centre planning objectives to unlock growth.
4.23.2	68	We welcome the amended description of the West London Orbital in response to our previous comments. Although construction work may begin by 2026, the earliest date when passenger services are likely to operate is 2029. As such, the date should be altered to ensure consistency with other documents.
4.23.3	68	The final sentence should be amended to reflect the fact that there is safeguarding in place for part of the Crossrail 2 route to New Southgate. We suggest it is simplified to read as follows 'This safeguarding refresh will include a revised the-alignment of the proposed New Southgate branch. <del>which is a part of the Crossrail 2 route that is not currently safeguarded.</del>
4.24.5	69	We strongly support the 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, we would 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.
Policy GSS09 Existing and Major New Transport Infrastructure	70	<p>We welcome the addition of a specific reference to supporting proposals that facilitate access to—and delivery of—the West London Orbital at Hendon, as well as seeking contributions towards its delivery. It may be helpful to express the potential number of new homes that could be supported as a minimum figure. TfL will continue to work with the Council to update this assessment.</p> <p>We welcome the more balanced approach to replacement parking although this could go further to ensure consistency with the new London Plan. As set out under 4.24.5, any re-provision of car parking as part of development of an existing station car park must be assessed against the same criteria as proposals for a new</p>

Section	PDF page	Track change/comment
		station with a car park. Where there is sufficient access by active travel and by bus, we would 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.
Policy GSS11 Major Thoroughfares	75	We welcome amendments to the last bullet point which now refers to 'any proposals for car parking...' as requested.
4.27.1/4.27.2/4.27.3	77	The wording of these paragraphs should be more positive in promoting the removal or reduction of parking spaces, particularly in well-connected locations. There is no need or demand 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.
Policy GSS12 Car Parks	77	The redevelopment of car parks, particularly in well-connected locations, is a key opportunity to make a more efficient use of land to address London's housing crisis and reduce congestion at the same time. We welcome the inclusion of this policy and the more nuanced approach, but the wording could still give much stronger encouragement to remove or reduce parking as part of redevelopment proposals particularly where sustainable alternatives exist. Re-provision should only be considered where it is essential e.g. for disabled persons parking or for operational reasons.
Policy HOU03 Residential Conversions	83	We are concerned that the amended wording suggests that the Council will only support the conversion of larger homes which provide 'Minimum car and cycle parking provision in accordance with policy TRC03'. This is inaccurate because car parking requirements in policy TRC03 are expressed as <i>maximum</i> not <i>minimum</i> provision. Given that 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). 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.'
Policy CDH01 Promoting High Quality Design	119	We welcome the added reference to the Healthy Streets Approach.

Section	PDF page	Track change/comment
7.7.6	159	We strongly support that development in town centres will be expected to enhance the public realm, and that reducing car travel will be encouraged. We therefore welcome the addition of a reference to consider opportunities to reduce on-street and off-street car parking as part of town centre development. However, we would question the accompanying caveat 'whilst acknowledging the contribution of appropriate car-parking facilities to the success of a town centre'. Most town centres in London do not rely on car parking for their success because people using active travel or public transport spend both more money time in the town centre. They are also more frequent visitors. On the contrary, reducing the dominance of vehicles has been shown to support town centre vitality by making the public realm more pleasant and inclusive, thus encouraging more frequent and longer trips.
Policy CHW02 Promoting health and wellbeing	182	We welcome the additional references to the Healthy Streets Approach and sustainable and active travel
Transport and Communications 11.2.1 – 11.8.5	241 -247	We welcome changes made to the introductory text and the more positive emphasis placed on supporting sustainable transport and active travel alongside recognition of improvements planned or underway such as step free access at stations. We are encouraged to see 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. We note the continued emphasis on encouraging and supporting new orbital travel links and we aim to work with you 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. Reference should be made to our Regulation 18 response on this point.
Policy TRC01 – Sustainable and Active Travel	248	As stated in the Regulation 18 response, we welcome the Council's commitment to active travel improvements and implementing the Healthy Streets Approach as well as the requirement for assessments and plans to show how they are contributing to meeting mode split targets.
Policy TRC02 –	213	As stated in the Regulation 18 response, we welcome the Council's support for delivery of new and enhanced



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Transport Infrastructure		<p>transport infrastructure. It would be helpful to confirm that where appropriate, development proposals will be expected to facilitate and contribute to the delivery of this infrastructure. We welcome the addition of 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.</p> <p>We suggest that point iii refers simply to an 'upgraded and enlarged Colindale Underground station' and that point iv refers to a new <b>London Overground</b> passenger rail line.</p>
11.12 Parking	252 - 254	<p>We welcome positive changes to the wording of this section and further progress in developing parking standards to better reflect the approach taken in the London Plan 2021. However, some of the wording needs to be updated to reflect the more positive approach including in 11.12.6 where reference to 'meeting parking requirements' is inappropriate when referring to maximum parking standards. There should be no minimum requirement for parking as is made clear in London Plan policy T6.1.</p> <p>As expressed in our Regulation 18. response, we have significant concerns about the use of 'orbital PTAL' and so we welcome the more nuanced approach which uses a range of measures of connectivity set out in 11.12.2. However, we would urge you to remove the requirement in 11.12.3 to measure the level of orbital access to determine parking requirements in PTAL 5 or 6. As previously stated, this is not a robust, objective measure and so it could be open to inconsistencies and challenge. Our understanding of the proposed measure is bus routes are subjectively excluded based on the angle at which they operate, 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,<sup>1</sup> 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.</p>

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<sup>1</sup> London Travel Demand Survey

Section	PDF page	Track change/comment
Policy TRC03 – Parking Management	255	<p>We welcome the changes to Table 23 which is now broadly in line with Table 10.3 in the London Plan 2021. We note that 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.’ We welcome the footnote which has been added 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. The residential parking standards are now in conformity with the London Plan.</p> <p>We welcome the requirement that ‘Cycle parking is to be delivered in accordance with London Plan Standards set out in Policy T5 Cycling’ and we welcome the addition of a reference to the London Cycling Design Standards (LCDS) in 11.12.10 to ensure the right quality as well as the right quantity of parking. We note the requirement 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 the 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.</p>
Sites no. 4, 5, 6, 15, 22, 23, 24, 27, 30, 32, 33, 34, 35, 39, 47, 53, 55, 58, 61, 62, 64		<p>These sites all make reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. The re-provision of parking and any parking associated with new uses should be minimised, taking into account the negative impacts of parking and be justifiable in its own terms, not simply due to its prior availability. Any assessment of ‘need’ should take into account that the availability of parking creates demand for it 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.</p>
Site no. 6	301	<p>We welcome the potential requirement for planning contributions towards station improvements, including step free access.</p>
Site no. 10	307	<p>We welcome the requirement for public transport access improvements.</p>

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Site no. 28	332	We welcome 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 no. 30	336	We welcome the requirement that the development should reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists.
Site no. 33	339	We welcome the use of residents' only parking controls to ensure that there is no 'overspill' parking.
Site no. 43	351	Any improvements to road junctions should follow the Healthy Streets Approach.
Site no. 44	352	We welcome the requirement that development must reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists.
Site no. 46	355	We welcome that 'the potential for the 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 ownership.
Site no. 53	365	We welcome the safeguarding of a portion of the site for new London Underground infrastructure which would be needed for a potential future upgrade of Northern line services and the requirement for station functions to be maintained.
Site no. 55	368	We support the continuation (and if necessary, extension) of local parking controls.
Site no. 61	375	Any development 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 no. 62	377	We recommend that car parking is removed from the proposed uses due to the well-connected town centre location and future PTAL of 5.
Site no. 67	383	We welcome that 'Due to the low PTAL, proposals should include measures that contribute towards modal shift away from private car use to more sustainable means of transport.'