

**LONDON BOROUGH OF BARNET
LDF CS AND
DEVELOPMENT MANAGEMENT POLICIES**

**Examination in Public – London Borough of Barnet's Response
Hearing Matter 7: Transport Issues**

Matter 7 – Transport issues

1. What is the justification for the Council's residential parking policies and their divergence from those in the London Plan? How are the proposed parking standards consistent with other environmental objectives in the CS and DMP DPD? Are the proposed parking policies for residential use too prescriptive?

The justification for Barnet's comprehensive residential parking policies is set out in Residential Car Parking Standards (DM026) which explains where the London Plan standards do not accord with local parking standards. The aim of the London Plan standards is to restrict residential parking in an attempt to constrain use of the car. Whilst we support this aim we are aware that many residents have a strong desire to own and use a car. Reducing their ability to park will not diminish this and we are concerned that it will simply lead to increased on street parking pressures with its attendant safety/congestion issues. Therefore we consider that the justification should not be simplified down to an argument about the supply and demand for parking. The wider policy approach to land use is equally relevant and can help contribute to reducing the need to travel by car. Our response to question 3 below explains how both DPDs will help to reduce the need to travel.

The principal difference between the London Plan and DM17 is one and two bedroom units. The London Plan 2011 (CD072) requires two bed units to have less than 1 space per unit whilst DM17 allows up to 1.5 spaces per unit. For one bed units whereas Barnet allows up to one space per unit the London Plan standard is less than one space per unit. We are concerned that adopting such a harsh parking restraint approach in new development regardless of context or a low Public Transport Accessibility Level (PTAL) in outer London could jeopardize the delivery of new residential development and create parking problems which have not hitherto existed. Parking across much of Barnet is not controlled with only eleven of Barnet's town centres having designated Controlled Parking Zones.

The London Plan also states that where there is good public transport accessibility development should aim for significantly less than 1 space per unit. Locating major development in areas of good PTAL would be the norm but the borough needs to be able to apply appropriate standards for small scale developments and

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early phases of major development in areas that will become more accessible as development proceeds.

It also needs to be considered that PTAL provide a measure of access to the public transport network, but do not take into account whether the transport takes travellers to where they want to go. There are locations in Barnet where, despite good PTAL scores, other measures of accessibility to services are low.

Our Parking Standards evidence presents the results of surveys of six flatted housing schemes in 2011 showing the number of vehicles parked on each of the developments with an estimate of the number of spaces the London Plan parking standards would have allowed. The survey results clearly show that on four of the sites application of the London Plan standards would reduce on-site parking spaces and cause overspill parking onto adjacent roads.

The sites selected for the parking survey were all smaller flatted developments located outside the regeneration and development areas with non-gated off street parking. Of the other two sites surveyed, one is a very low PTAL area and one demonstrates that the number of vehicles would have met the London Plan standards.

We consider that our experience of successfully applying the adopted and saved 2006 UDP (CD064) residential car parking standards justifies our continued application of standards which are proven to work effectively in Barnet. We consider that the parking standards for 1 and 2 bed flats allow Barnet the flexibility to vary the provision according to all relevant local circumstances. Of particular relevance is the many small and medium size developments in Barnet which are not referable to TfL and the Mayor and we contend that TfL are not aware of the parking issues around such developments.

Barnet does not agree with TfL's request that the Inspector directs the council to adopt London Plan standards, with or without the sub text set out in TfL's Statement. The Statement makes no reference to Barnet's evidence on car parking and at para 4 makes a misleading statement regarding Barnet's assumed recognition of the London Plan policy. Although the quote from 18.8.1 of DM17 is factually correct clearly the policy goes on to explicitly qualify the intended position in DM17g(1) in diverging from the London Plan.

Critically in this matter it is acknowledged by the Mayor that boroughs can set their own parking standards, provided that suitable evidence can be provided to support this. TfL in their own

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statement (section 5) accept the need for local authorities to address local issues when setting local policies. We therefore consider it wholly appropriate that our locally specific standards continue to apply in Barnet, and believe that the requisite evidence has been provided to support this.

The Council welcomes the intention of the Mayor to publish a Housing SPG, however the TfL Statement provides no guarantee about the detailed contents of such a document in relation to parking.

We do not consider that Barnet's standards are particularly divergent from the London Plan as to encourage excessive car use and compromise other environmental objectives in the LDF. Whilst the DMP sustainability appraisal (SA) (DM04) highlights the negative impact of DM17 both on congestion and air quality it considers that it may be off set by the car free aspect of the policy. However the SA does recognise that it is not possible to quantify this.

We do not consider the proposed parking policies for residential development to be too prescriptive, rather they provide additional flexibility over and above that of the London Plan. As DMP para 18.8.2 states we intend to continue to sensitively apply these Barnet standards dependent on local circumstances. We also state that Barnet standards will be applied flexibly based on individual locations and set out the six factors which will be considered as part of this flexible application.

2. Should the DMP DPD identify if and when a planning application should be accompanied by a transport assessment?

We consider it important that the DMP identifies when a planning application is accompanied by a transport assessment so that the potential negative impacts of congestion and increased emissions which could be created are considered and mitigated where appropriate. The DMP identifies and uses the thresholds in the Department for Transport "Guidance for Transport Assessment" (DM094) which are the trigger for the requirement for a transport assessment. This is set out in para 18.5.1 and referred to in the policy. We have clarified this in Pre Examination Amendment (DMPEA2)

3. What measures do these DPDs contain that take appropriate account of the needs of sections of the population with lower levels

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of car ownership (e.g., the elderly) to access local health and other services by other means?

Barnet's access to health services (hospitals and GPs) is broadly average compared with other London boroughs and in common with the rest of London better than the national average. According to Department of Transport Core Accessibility Indicators for access to services ([EVD029](#)) 100% of Barnet residents live within an hour of a hospital by walking or public transport. 92.4% of all residents and 93.9% of residents in households without a car live within 30 mins. Also 100% live within 30 minutes from a GP and 99.7% (of all residents and those without a car) live within 15 mins.

Barnet's LDF seeks to ensure that the important local services that people use such as health services and schools are located in areas accessible by walking, cycling or public transport, primarily bus services.

The cumulative impact of the following policies

- **CS6** **Promoting Barnet's town centres,**
- **CS8** **Promoting a Strong Prosperous Barnet,**
- **CS9** **Providing safe, effective and efficient travel and**
- **CS10** **Enabling Inclusive and Integrated Community Facilities**

is to reduce the need to travel and are supported by DMP policies.

We identify in CS6 major and district town centres where we will realise larger development opportunities using the sequential approach outlined in DM11.

In DM12 we seek to protect and enhance 'local' neighbourhood centres and parades of shops, by only permitting development where it can be demonstrated that shopping facilities will not be significantly reduced. In support of DM12 at para 13.1.1 in emphasising the importance of maintaining the local centres and parades there is specific reference to older people, those less mobile and without access to a car. To support this approach the Local Centre Retail Frontages Report ([DM025](#)) defines and details the frontages to be protected to enable the monitoring of shopping facilities in these 15 centres.

CS 8 aims to encourage new mixed use commercial floorspace in the priority town centres where PTAL is good. Further to this

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DM14 aims to ensure that proposals for new office space follow a town centre first sequential approach. This is to ensure that they are in the more accessible parts of Barnet with the intention to support town centre vitality and viability. The aim of this is to reduce congestion. It will also help sections of the population with lower levels of car ownership to access new employment opportunities.

CS9 sets out clear priorities for public transport improvements across the borough. It also seeks to encourage mixed use development in order to reduce the distances that people need to travel to access everyday goods and services. The policy is supplemented by DM17 which sets out our expectation that significant trip generating potential is located where it will be highly accessible by a range of transport modes. Again the aim is to reduce the need to travel.

CS10 aims to provide community facilities for Barnet's communities. As well as policy to encourage the provision of multi-purpose community hubs including the use of schools we will expect development which increases demand to provide or contribute to new facilities particularly in town centres.

DM13 compliments this by setting out a town centre first sequential approach to the location of new community uses or where they can be accessed by public transport. The policy also protects against the loss of community / educational uses where demand continues or a suitable alternative location can be provided. This helps to ensure that current facilities are maintained and new facilities are located in locations accessible by public transport.

As well as town centres we recognise the importance of local services. DM07 permits a loss of housing where a small scale community facility is to be provided. A health facility is one of the community facilities permitted with the aim to help improve local access which again will help those without a car and also help with a more general reduction in the need for people to travel.

The physical accessibility of the transport system will be improved through new and replacement infrastructure provided in regeneration and town centre enhancement schemes and through general carriageway, footway, traffic management and bus network improvements as older arrangements that do not meet the levels of provision, especially for disabled people, expected today are replaced.

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Step free station access is being pursued at a number of locations in association with major development schemes. These include Brent Cross, Colindale and potentially Mill Hill East underground stations and existing and new stations on the Midland mainline are also planned to have step free access through the Brent Cross Cricklewood development.

A high proportion of bus stops in Barnet are currently recorded as not accessible because they do not provide the full range of features identified by TfL. Barnet endeavours to ensure that kerb heights are suitable for deployment of bus stop ramps when carrying out any footway relay or traffic management work at relevant locations but places a lower priority on providing formal bus stop clearways to enforce no stopping arrangements, particularly where other arrangements appropriate to local circumstances already operate effectively.

4. Should the two DPDs identify more clearly measures that will be promoted for safer and more convenient transport such as additional 20mph zones in residential areas, investment in cycling or other measures to provide alternatives to the carborne "school run"? Would such measures be consistent with the findings of the TfL Strategy for Transport (2010)? What other measures might be appropriate to address road safety in a suburban borough?

We do not consider that the DPDs should identify specific measures that are provided in developments or more widely in the borough to address safety and travel choices. Appropriate solutions will reflect local problems and circumstances.

The Road Safety, Transport Assessment, Travel Plan and Local Infrastructure requirements of DM17 provide the opportunity to identify and provide locally appropriate measures in new developments.

Barnet's Draft Local Implementation Plan (LIP) ([EVD031](#)) has been produced in response to the Mayor's Transport Strategy ([REG014](#)). The plan draws on issues and objectives identified through development of the CS and includes targets for road safety, bus reliability and increased walking and cycling as well as road condition and transport CO₂ emissions.

Taking a comprehensive approach to tackling the school run is a high priority for Barnet's CS as highlighted in Section 14.9. Nearly

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all Barnet schools now have a School Travel Plan (STP). STPs have delivered reductions in car travel to school of 12 per cent on average. Nevertheless the proportion of pupils travelling by car remains the highest in London. Some STPs are only partly adhered to, and as set out in CS para 14.9.2 and CS9 we will continue working with schools, students and parents on improving them.

Student parking in residential areas around schools contributes to congestion and safety concerns. It frustrates local residents whilst undermining the efforts of schools and families to make responsible travel choices. The LIP highlights that as well as implementing improvements to complement STPs we will consider action to prevent pupil parking in neighbourhoods around schools.

Improvements to the bus network through new routes and better interchange facilities are being sought in the regeneration and development areas. We will work with TfL to improve the bus network to help ensure services are convenient, fast and reliable for residents, closely and efficiently matching demand and capacity. We seek to ensure that buses use appropriate roads that are reasonably direct avoiding the use of residential streets that are unable to accommodate them.

Barnet has a number of cycle road routes through parks and open spaces that have been enhanced and extended recently, and there is scope to expand this provision. The vast majority of roads in Barnet are minor and provide a significant resource for cycling which are highlighted in the London Cycle guides. Improving the condition of these coupled with better signage, and work to raise their profile would complement the off-road provision and the networks planned in development areas.

With regard to Road Safety the LIP notes:

Road traffic casualties are high in absolute terms with casualty numbers among the highest in London, but lower when the size of the borough and traffic volumes are taken into account, with car and goods vehicle occupants making up a higher proportion of casualties than is typical for London. Recent increases have been seen in numbers of slightly injured casualties, although those killed or seriously injured continue to fall.

Safety on the road network in Barnet has improved dramatically since 2000, in common with London as a whole (According to the TfL Road Safety Unit 136 people were killed or seriously injured in

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road traffic accidents in Barnet in 2008 compared with 261 in 2000).

According to the LIP respondents to the National Highways and Transport Network public satisfaction survey rated Road Safety as highly important but mid-range in terms of satisfaction, performing rather better in this regard than our other priorities.

The LIP sets out targets for a 10 per cent reduction in casualties overall by 2020 and a 33 per cent reduction in casualties killed or seriously injured. It identifies actions to deliver this:

- Accident reduction schemes introduced through wider corridor and area based proposals on main and distributor road corridors
- Road layout and junction improvements in conjunction with development proposals
- Programme of small scale traffic management and road safety improvements
- Pedestrian, cyclist and road safety training

In addition we monitor the levels and types of accident on the borough's roads and develop local road safety solutions to target locations with high numbers of personal injury accidents plus create educational initiatives to support road safety among children and vulnerable groups.

All new roads and junctions constructed in Barnet will be designed and built with full consideration to road safety. Road safety audits will be carried out at each appropriate stage.

The Council does not support the introduction of 20mph zones, which rely on physical measures to restrict the movement of traffic. The types of measures typically implemented can also have adverse impacts on local residents, bus services and emergency services. While 20mph zones have undoubtedly been successful in many areas where they have been introduced in response to a history of road traffic accidents, the distribution of accidents in Barnet is such that other measures are likely to be a more cost effective means of reducing casualties. This does not preclude the introduction of 20mph area speed limits if justified in a particular location, but a general policy of introducing these in residential areas is not considered appropriate.

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