

Barnet Local Plan EIP – Strategic Policies GSS11 & GSS12

Reason for producing this note

On Day 6 (Thursday 6th October) of the hearing sessions, during consideration of Matter 6: Transport, Communications and Infrastructure, Inspector Philpott requested a note covering a number of issues relating to the Council's strategic policies GSS11 (Major Thoroughfares) and GSS12 (Redevelopment of Car Parks).

This note, to include any resultant proposed modifications, encompasses the following matters:

- Ensure internal consistency between Policy GSS11 and its supporting text and with the Key Diagram.
- Clarify the policy approach to the A406, A1 and A141 and propose any necessary modifications.
- Provide a justification for and explanation of the selection of roads included in GSS11 and any omissions, including (but not limited to) the A110, A502, A5109 and M1.
- Explain and clarify what support is given by Policy GSS11 to non-residential uses and alternative uses and consider whether the policy or others in the Plan provide adequate control/management of potential development.
- Clarify what support is intended to be given by Policy GSS11 to development not physically adjoining major thoroughfares (i.e. the relationship expected and any flexibility thereto).
- Explain the role of the Designing for Density SPD and clarify that it is not intended to allocate land.
- Cross-referencing between policies GSS11, ECC02 and TRC03 and open space policies in respect of air quality / parking / open space.
- Move references to supporting text or explain within Policy GSS11 what are meant by “wall like corridors” and “medium rise” buildings for clarity.
- Consider whether further articulation of the “aim” in policy GSS12 is needed in the context of the Council's / Mayor's car reduction objectives and para 107 of the NPPF.
- Clarify suitable (non-residential) uses for GSS12 and how a suitable mix will be achieved according to location.
- Explain the approach across GSS11 and GSS12 in respect of parking strategies and MM109.
- Consider potential overlaps between GSS12, CDH01 and ECC02 and look at opportunities for potential cross referencing to ensure consistency of approaches.
- Explain the purpose of the second bullet point in GSS12 with regards to public transport and active modes of travel and reflect on its effectiveness and necessity in light of the third bullet point.
- Clarify the position on car parking re-provision and how it works during the construction phase for the purposes of GSS12.

Background

Following submission of the Barnet Local Plan in November 2021 the Council in June 2022 produced a table of proposed modifications (EXAM 4). This document was produced after consideration of the Reg 19 soundness representations received, together with subsequent discussions with parties on the drafting of Statements of Common Ground. EXAM 4 includes proposed modifications to policies and supporting text pertaining to policies GSS11 and GSS12 and the supporting text to these policies. These proposed modifications (MM104 to MM109) were considered during the examination hearing session where Matter 6 was

discussed. However, in the light of that discussion and the requests made by Inspector Philpott for further clarification, explanation and justification of the matters detailed in this note, the Council now proposes a series of additional further modifications as set out below.

The following format has been used in this Note to denote further proposed modifications to the submission version of plan as revised by the proposed modifications listed in EXAM 4.

~~Strikethrough text~~ to indicate text proposed for removal.

Underlined text to indicate additional text.

Consideration

1) *Ensure internal consistency between Policy GSS11 and its supporting text and with the Key Diagram*

The five A road major thoroughfare routes (A1000, A598, A5, A504 and A110) depicted on the Key Diagram are listed on the key and identical descriptions are provided in para 4.26.1 of the Plan which supports Policy GGS11.

However, for avoidance of any doubt the Council proposes a further modification to the first sentence of the policy so as to read:

Redevelopment along Barnet's main road corridors as set out in the Key Diagram and listed in para 4.26.1 can provide

The Council acknowledges that there are merits in identifying these major thoroughfares. It therefore proposes the following modification to GSS11

Redevelopment along Barnet's Major Thoroughfares (A1000, A598, A5, A504 and A110) ~~main road corridors~~ as set out in the Key Diagram can provide a significant supply of sites for growth.

2) *Clarify the policy approach to the A406, A1 and A141 and propose any necessary modifications*

As stated in para 4.26.6, these routes form the Transport for London Road Network (TLRN) within Barnet. Unlike the Major Thoroughfares identified in para 4.26.1 these routes are not managed by the Council. Any changes to routes in the TLRN and the M1 (managed by National Highways) will have to be implemented by the respective highways authorities. The schedule of site proposals (Annex 1) already includes a number of sites adjacent to these highways. This includes Site 15 – Tesco Coppetts Centre and Site 31 – Brentmead Place on the A406 and Site 50 – Watford Way and Bunns Lane on the A1. Policy GSS11 highlights that over the Plan period the environment around the Major Thoroughfares is likely to improve with regulatory changes and the introduction of new technologies. The Council is committed to delivering Healthy Streets in Barnet and will measure improvements against the Healthy Streets Indicators. The Council acknowledges that GSS11 and supporting text should be more explicit on how such improvements will be gauged. It proposes a cross-reference to London Plan Policy T2 – Healthy Streets which sets out the Healthy Streets Approach. This consists of 10 indicators of a healthy, inclusive environment in which people choose to walk, cycle and use public transport. A key consideration for the Council will be improvements in air and noise quality as well as PTAL. The Council therefore proposes the following modifications :

New para 4.26.7

The Council is committed to delivering Healthy Streets in Barnet and will measure improvements against the Healthy Streets Indicators set out in the London Plan Policy T2 – Healthy Streets and Figure 10.2 which sets out 10 indicators of a healthy, inclusive environment in which people choose to walk, cycle and use public transport. A key consideration for the Council in unlocking opportunities along the Major Thoroughfares in the TLRN will be significant improvements in air and noise quality as well as PTAL.

Policy GSS11 – last para

The Council will consider long term opportunities along the Major Thoroughfares within the Transport for London Road Network (TLRN) (A406, A1 and A41) subject to improvements against Healthy Streets Indicators and Public Transport Accessibility Levels.

3) Provide a justification for and explanation of the selection of roads included in GSS11 and any omissions, including (but not limited to) the A110, A502, A5109 and M1

The Major Thoroughfares (A1000, A598, A5, A504 and A110) and depicted on the Key Diagram are managed by the Council. TfL also operate and maintain traffic signals on all roads, and have certain wide-ranging powers, such as the ability to introduce road pricing proposals like the Ultra Low Emission Zone and the Congestion Charge. . Compared to the TLRN the Thoroughfares managed by the Council have better connectivity between town centres. They all have better levels of accessibility with a range of public transport options available along their routes, (bus routes, underground and mainline rail stations). Development is coming forward on sites that access onto these 'A' roads. Recent examples of completions include Totteridge Place on the A1000, a 124 unit residential redevelopment on a former B&Q store. Another completed example is The Rushgroves a 386 home, residential led mixed use redevelopment on a former Homebase store on the A5 near Hendon. The Key Diagram illustrates how important these Major Thoroughfares are in connecting town centres. The A5 and A1000 in particular as historic transport routes that traverse the Borough, connecting Cricklewood with Edgware and East Finchley with Chipping Barnet Bringing these routes back into residential use through redevelopment of former commercial uses such as DIY outlets helps to attract investment, open opportunities for more sustainable and efficient use of land as well as reduce dependence on the car as a mode of transport. This has a beneficial effect on TfL public transport investment and initiatives such as improvements to public realm, road safety and sustainable modes of travel arising from the Mayor of London's Healthy Streets Approach. Infill and intensification as well as generating investment for environmental improvements also reconnects these routes with their suburban hinterlands creating a better sense of place.

The Council has not considered the M1 motorway as a Major Thoroughfare. Policy GSS11 clearly states the criteria for when development proposals will be supported. This includes an improved and more active streetscape as well as facilitating delivery of the Healthy Streets Approach. The M1 has no public transport accessibility in terms of bus routes and stops, underground and mainline rail stations. One of the Indicators for Healthy Streets is ability to cross the road. Development of sites along the M1 for employment land uses would be considered with regards to Policy EGY01 as addressing it with regards to the Healthy Streets Approach would be unrealistic.

4) Explain and clarify what support is given by Policy GSS11 to non-residential uses and alternative uses and consider whether the policy or others in the Plan provide adequate control/management of potential development.

GSS11 is primarily focussed upon residential led mixed use development, supporting proposals that help deliver Healthy Streets. Investment in revitalising locations on Major Thoroughfares through infill or intensification can be led by uses other than residential. There is potential for commercial led development. The Council through GSS11 envisages development be it residential or commercial helping to support the revitalisation of these routes. The Council proposes the following modifications to GSS11 and supporting text :

Opening para of GSS11

Redevelopment along Barnet's ~~main road corridors~~ Major Thoroughfares as set out in the Key Diagram can provide a significant supply of sites for residential and commercial growth and facilitate delivery of the Healthy Streets Approach. Such locations have capacity to deliver an additional 3,350 new homes. The Council will work with TfL and National Highways England to help deliver appropriate sites.

4th bullet point

Contributes to an improved and more active streetscene; ~~and facilitates delivery of Healthy Streets Approach;~~

Para 4.26.1 Major road corridors in Barnet tend to be very heavily trafficked, which creates an unattractive environment both for residents living along the route and businesses. Reducing car dominance and creating a more attractive environment designed to healthy streets standards, will have a positive impact on residents by helping to mitigate poor air quality. It will also benefit businesses, by creating an attractive environment. These corridors through Barnet provide, in certain cases, opportunities for infill, and intensification and investment.

4.26.2A The Healthy Streets approach puts human health and experience at the heart of planning the city. It uses ten evidence based indicators to assess the experience of being on London's streets. Rather than providing an ideal model for a street, the approach accounts for each street's function and points towards how better-quality environments can be created.

4.26.3 Working towards Delivering the Mayor's Healthy Streets Approach is as much about creating a more attractive environment designed to healthy streets standards, which will have a positive impact on footfall and dwell time as it is on facilitating ~~of~~ a modal shift away from the private motor vehicle to more sustainable modes such as public transport, cycling and walking, will help to improve the environment along the Borough's thoroughfares. Proposals coming forward along these road corridors must themselves support the Healthy Streets Approach.

5) Clarify what support is intended to be given by Policy GSS11 to development not physically adjoining major thoroughfares (i.e. the relationship expected and any flexibility thereto).

The Council refers to Barnet's Characterisation Study which highlights that since the mid twentieth century, many of Barnet's major routes have undergone a significant amount of change. Traffic has had a significant impact upon their historical character whilst ribbon development along these routes has resulted in elongated areas of town centre activity. Although many of these routes have been established for several centuries, the majority were not developed until the Victorian and Edwardian periods. Historically these streets were lined with a variety of villas, terraces, and large houses built speculatively as a

manifestation of London's outward growth. These large Victorian and Edwardian buildings where characterised by their exceptionally large plot sizes. During the years that immediately followed the Second World War there was an increasing trend for a series of houses along these streets to be bought up and demolished, as developers would amalgamate large plots in order to accommodate low rise apartment blocks or big box development.

The Council proposes the following modification :

New para 4.26.5A

Barnet's Characterisation Study highlighted an association between the Major Thoroughfares and 'big box' development, typically large single building units (sheds) typically coarse grained and without an over-arching urban structure. These 'big boxes' are often surrounded in parking. The Council will consider sites close to Major Thoroughfares that lack an over-arching urban structure (such as 'big box' development) with regards to Policy GSS11. Whilst policy GSS11 relates to sites that are immediately adjacent to and therefore readily able to access the Major Thoroughfares identified in the policy, the Council recognises that there will also be a number of nearby sites with large plots that do not physically adjoin one of the major thoroughfares. Development proposals that come forward on such large and accessible sites that are in close proximity to the thoroughfares and afford similar opportunities for growth are also likely to be supported where they satisfactorily address the criteria outlined in policy GSS11

6) Explain the role of the Designing for Density SPD and clarify that it is not intended to allocate land.

The Council understands the role and remit of supplementary planning documents (SPDs) and the appropriate relationship between policies and allocations included within a development plan and supporting guidance and information that might be included within an SPD. Therefore, for the avoidance of doubt, the Council can confirm that it is not intending to defer allocation of land through SPD. The forthcoming Designing for Density SPD will provide guidance on on design and density of development across the Borough. The Council proposes to delete the reference to the SPD to avoid confusion.

Para 4.26.5 last sentence

~~The Council is preparing a Height Strategy Supplementary Planning Document to guide designs along these road corridors.~~

7) Cross-referencing between policies GSS11, ECC02 and TRC03 and open space policies in respect of air quality / parking / open space.

It is of course important for plan users to read the plan as a whole when preparing or considering a development proposal. However, as with many policies through the plan, the Council recognises the value in making the plan as accessible and user friendly as possible. This can usefully include cross referencing to other policies in the plan that may be relevant and therefore need to be considered.

Policy GSS11 makes reference to air quality and noise pollution (environmental considerations covered in some detail in Policy ECC02), access to open spaces and play space (Policy ECC04), design (Policies CDH01 and CDH04 in respect of tallbuildings) and also sustainable and active travel (Policy TRC01) and car parking, the details and standards for which is addressed in Policy TCR03 which covers parking management issues. These have all been the subject of separate notes.

The Council therefore proposes a further modification to GSS11 that signposts reference to other potentially relevant policies in the plan.

Development proposals will ~~having regard to other relevant policies in this plan~~ be supported in those locations where it compliance can be demonstrated with that:

- Access to walking (see Policy TCR01);
- Design (see Policy CDH01);
- Achieving a high-quality design ... (see Policies CDH01 and CDH04);
- Contributes to an improved and more active streetscape (see Policy TCR01);
- Avoids unacceptable levels of air and noise pollution (see Policy ECC02);
- Supports and, where appropriate improves, access to open spaces (see Policy ECC04); and
- Any proposals to provide car parking (see Policy TCR03).

8) Move references to supporting text or explain within Policy GSS11 what are meant by “wall like corridors” and “medium rise” buildings for clarity.

The Council refers to MM104 which proposed the deletion of text from para 4.26.2 as it is inconsistent with Policy CDH04. The Council sets out within para 4.26.2 that any ‘tunnelling’ effect from buildings must be avoided, and a sense of separation must be maintained between town centres.

It is therefore suggested that the following further proposed modifications are made:

- i) Amend the third bullet point included within Policy GSS11 to read:
 - Achieves a high-quality design that enhances visual amenity ~~and does not contribute to a continuous ‘wall like’ corridor of medium rise buildings between town centres~~; and ensures a sense of separation between town centres

9) Consider whether further articulation of the “aim” in policy GSS12 is needed in the context of the Council’s / Mayor’s car reduction objectives and para 107 of the NPPF.

The Council refers to its Note on Policy TRC03 – Parking Management and its proposed modifications on parking requirements. This includes a revision to TRC03 in terms of a response to the Inspector’s request at Point 9 to revisit off-street parking in TRC03(d) and ensure consistency with London Plan Policy T6(L).

The Note states that the Council, with regards to Policy GSS12, will accept the loss of off street short-term publicly available parking only where this would not lead to under-provision in the locality. This will be supported by a new para at 11.2.6A which emphasises retention of short term publicly available parking spaces where they are needed to support town centre vitality and viability or serve an identified need such as spaces for disabled persons or operational reasons. Town centre development will be required to make available to the public any parking provided. New public off-street parking will be subject to a S106 legal agreement to control the layout of the parking spaces, the nature of the users and the pricing structure. Where parking is created or reallocated, the Council will encourage the allocation of spaces for low emission vehicles, car clubs, pool cars, cycle hire and parking, and electric vehicle charging equipment. In accepting the loss of parking that the Council will have due

regard to the need for continued parking provision whilst taking into account the Borough mode share targets and the availability of active travel means and public transport provision. The Council proposes modifications to GSS12 and supporting text to clarify this approach.

Policy GSS12 – Redevelopment of Car Parks, seeks to support the sustainable, efficient use and supply of land that is required to help meet Barnet’s housing needs. This policy supports consideration being given to the potential for releasing publicly accessible surface level car parking spaces across the Borough to enable the development of that land for residential and other suitable uses. However, in supporting the vitality and viability of its town centres, the Council fully recognises the importance of ensuring an adequate supply of conveniently located car parking spaces. It therefore makes cross reference to TRC03 which accepts at TRC03(d) the loss of off street short-term publicly available parking only where this would not lead to under-provision in the locality and where they are needed to support town centre vitality and viability or serve an identified need. The Council confirms that its approach on car parking set out in Policy TRC03 – Parking Management (with further clarification provided by the Note on TRC03) is consistent with NPPF para 107.

The Council has already proposed two modifications to the wording of Policy GSS12 (EXAM 4 MM109 and MM110 refer). In addition to these the Council now suggests the following additional modifications:

Para 4.27.2 The Council acknowledges the importance of a convenient ~~and~~ good quality and publicly accessible parking supply to ensuring thriving and competitive town centres. The Council will seek to retain short-term publicly available spaces where they are needed to support town centre vitality and viability. or serve an identified need such as spaces for disabled persons or operational reasons. Within town centres where short -term publicly available spaces are available in ~~there are~~ several car parking locations, enabling greater parking system efficiency can help provide a better level of service for local people, businesses and visitors, and provide some capacity for further demand. In circumstances where development in town centres provides parking it will be required to make such provision available to the public. In considering local capacity the Council may seek a dedicated development related parking strategy in order to review the existing pricing, timing, availability and management of publicly available car parking spaces. This will enable enhanced matching of precise space availability in type and location to existing and anticipated future parking demand and assist in achieving the desirable parking system efficiencies.

Paragraph 4.27.3 amend final sentence to read:

The submission of a ~~A clear~~ strategy will be required as part of any proposals entailing the ~~for~~ redevelopment of car parking spaces to ensure minimum disruption to parking in the town centre or local area during ~~construction.~~ redevelopment of the ~~any car parking spaces.~~ The strategy should clearly demonstrate how access to the town centre or local area will be maintained throughout the construction period.

Reflecting MM109 and MM110 further amend Policy GSS12 to read as follows:

~~In order to~~ To ensure the efficient and sustainable use of land the Council will support re-development of parking spaces within publicly accessible surface level car parks for residential and other suitable main town centre uses provided that:

- The design ~~preserves~~ has no significant adverse impact on the amenity of neighbouring uses;
- It can be demonstrated ~~Demonstrates~~ how the existing use of public transport and active modes of travel will lead to reduced car park usage; and
- With regard to Policy TRC03 ~~The~~ any retention of parking spaces can be demonstrated as necessary to support vitality and viability within a town centre or serve an identified need surplus to requirement, with the intention ~~aim~~ to re-provide any spaces only where it is essential, for example for disabled persons or operational reasons.

10) Clarify suitable (non-residential) uses for GSS12 and how a suitable mix will be achieved according to location.

By reference to suitable non residential uses the exact uses and the configuration / mix will need to be determined on a case by case basis. Whilst likely to be dependent on the precise location and any particular individual site constraints etc, the Council has in mind other main town centre uses as defined in the NPPF.

See above an additional proposed modification making explicit reference in Policy GSS12 to “other suitable main town centre uses”.

11) Explain the approach across GSS11 and GSS12 in respect of parking strategies and MM109.

Policy GSS11 does not make reference to parking strategies. In respect of policy GSS12, the response given to matter 9 above and the proposed revision to the final sentence of paragraph 4.27.3 clarifies the Council’s expectations as to the purpose and anticipated content of a parking strategy submitted in support of proposals that involve the loss of existing car parking spaces.

12) Consider potential overlaps between GSS12, CDH01 and ECC02 and look at opportunities for potential cross referencing to ensure consistency of approaches.

The Local Plan, and the policies it contains, need to be read and considered as a whole. Therefore, the Council agrees that to assist the plan user it would be helpful within policy GSS12 to make cross references to policies CDH01 (Promoting High Quality Design) and TRC01 (Sustainable and Active Travel) as well as Policy ECC02 – Environmental Considerations

Therefore, the Council proposes a further modification adding a sentence to the end of Policy GSS12 stating as follows:

Policies CDH01 – Promoting High Quality Design, TRC01 – Sustainable and Active Travel and ECC02 – Environmental Considerations provide more detailed policy considerations regarding design, making the most efficient use of land, the promotion of sustainable and active travel and ensuring improvements to air quality.

13) Explain the purpose of the second bullet point in GSS12 with regards to public transport and active modes of travel and reflect on its effectiveness and necessity in light of the third bullet point.

The second bullet is included to ensure that, those promoting proposals that will result in the net loss of car parking spaces, fully justify their case by including reference to and analysis

of the public transport and active modes of transport alternatives available. In permitting such proposals the Council would require assurance that they would be unlikely to result in detrimental impacts effecting the vitality and viability of town centres. This is expressed as the provision of short-term publicly available spaces. It is anticipated that evidence would be provided demonstrating the likelihood and propensity that current car user visitors would be prepared to switch to using alternative more sustainable transport modes were the current number of parking spaces. Therefore, presenting evidence of existing good public transport services (bus, tube and rail) and connections together with availability of attractive and safe local walking and cycling routes. Whilst these matters might be addressed in seeking to satisfy the third bullet point criteria, the Council considers there to be benefits derived from spelling this out and would therefore prefer to retain in the policy the second bullet as proposed to be modified.

14) Clarify the position on car parking re-provision and how it works during the construction phase for the purposes of GSS12.

The Council refers to Point 9 with regards to retention of spaces that are short-term and publicly available within a town centre or serve an identified need. Consideration of the re-provision of car parking spaces and how this would operate during construction phases would be dependent upon individual proposals. As this is likely to vary it is therefore not possible or appropriate to provide details within the Local Plan itself, other than stipulating the general expectation requiring that essential spaces such as for disabled persons and any demonstrably needed for operational reasons would be re-provided.

Conclusion

The Council invites the Inspectors to consider and recommend that the Council makes the additional further modifications set out in this paper recognising that those considered to be Main Modifications will need to be formally consulted upon in due course.