



Barnet Draft Local Plan (Reg 18) Preferred Approach Consultation - Barnet Cycling Campaign response

Barnet Cycling Campaign is the local borough group of London Cycling Campaign ([LCC](#)). We represent the interests of cyclists living or working in the Borough of Barnet and aim to expand the opportunities for all to cycle safely in the borough.

The group has over 300 members in Barnet of all ages and abilities, including commuter, utility, sport and leisure cyclists. We encourage more active, healthy forms of travel and help to get people out on their bikes and riding on the roads in Barnet. We campaign to make streets in Barnet healthier, safer and an improved experience for all cyclists, walkers and public transport users.

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Comments on Ch. 1 - Introduction

Sustainable development is central to both the revised NPPF, the London Plan and the Local Plan and sustainable travel is a key component. Recognising this, the London Mayor issued his Transport Strategy six months before the London Plan, so that transport policies could be included.

It is unfortunate that consultation on LB Barnet's Transport Strategy, which includes proposals relating to transport that should be reflected in planning policies, closes after the Reg 18 stage of its Local Plan. For example, proposals for Low Traffic Neighbourhoods are included in the Transport Strategy, but not in this version of the Local Plan. We will respond separately on the Transport Strategy and have included some key points relating to active travel in this response.

The Infrastructure Delivery Plan (IDP) is key to showing where spending priorities have been up to now and for informing our comments on how they need to change. This doesn't appear to have been published, to show what has been delivered, since November 2012 and a revised IDP will not be issued until the next stage of consultation.

The Local Plan should represent a significant opportunity to improve active travel in Barnet. We comment on the relevant chapters and policies to show this needs to be prioritised.

Comments on Ch. 2 - Challenges and Opportunities

We need everyone to support taking real steps to get people out of cars, even if it's a bit uncomfortable when it comes to our own habits. This is even more important as Barnet grows, or we'll all grind to a halt anyway. And this doesn't always mean big, bold expensive schemes - many small scale local interventions can make a real difference.

How many Barnet councillors and planners have tried swapping cars for bikes or ebikes for a month? Or have ridden on the worst roads in the borough with Barnet Cyclists? Or have strapped on a personal pollution monitor to see how you and your kids are exposed to emissions? Or have accepted our invitation to look at Low Traffic Neighbourhood schemes in [Waltham Forest](#)ⁱ and [Enfield](#)ⁱⁱ? The challenge here is to rise above party politics and adopt best practice whether that's from London, Manchester or Europe.

[Low Traffic Neighbourhoods](#)ⁱⁱⁱ (LTNs) work and are popular with residents – drivers use live routing apps that take them down back streets to avoid congestion, but end up causing more congestion when forcing their way back onto main routes used by buses (St Margarets Ave is a prime example). Meanwhile they make life unpleasant and dangerous for residents, particularly the young and the elderly, and stop them walking and cycling.

[School streets](#)^{iv} and 20 mph limits improve safety and encourage parents and children to use active transport to school. Barnet has no School Streets.

Parking charges and road pricing works – it works in cities where it has been introduced including London, with the congestion charge. But we need to make it clearer to people that if you drive your car unnecessarily you need to pay a bit more. Smart road-user pricing could charge people by time of day, where they're driving, how far, what type of vehicle they use etc. This will cut unnecessary car use and raise much-needed funds in the face of government cuts.

“Shared mobility”, such as electric bikes and cars you can just pick up and drop off wherever you want and need, mean it’s more convenient than ever to not own a car. Indeed, for anyone other than people who absolutely need to commute in a car, it’s not only a lot cheaper, but also less stressful. The issue then is making sure there’s lots of shared mobility vehicles around to use, and making sure there’s lots of safe cycling routes, so those who don’t need a car can pop on a bike instead. The alternative is that we all sit in traffic fumes forever as Barnet’s population grows and the planet burns.

Fear of global flu pandemics could make people avoid crowded public transport, at least in the short term, in favour of private car use and home deliveries and possibly walking and cycling. This can only add to the problems of congestion.

Focus on cycling

LTNs, School Streets, 20 mph limits, shared mobility and reducing traffic would all benefit cycling and improve physical and mental health.

The school run is 1/5th of rush hour traffic, 1/3rd of London car journeys are under 2km, and TfL says millions of daily car journeys could easily be cycled or walked – these are short, single-occupant, light load, A to B journeys.

Look at European cities for example: cycling isn’t just for the types of people you see on bikes in London (male, fit, Lycra); in Europe, all sorts of people cycle on all sorts of cycles – including school children, families, people with disabilities, the elderly etc. Why can’t this apply to Barnet? Study after study has shown that the main impediment to mass-cycling is the lack of safe infrastructure to keep cyclists safe from motor vehicles. Not weather and not topography – and where hills are an issue, Ebikes are the solution.

School Travel Plans need to consider suitable school uniforms. A blazer, collar and tie and long trousers are not ideal cycle clothing, particularly in the summer. At schools where the uniform is much more suitable for cycling (polo shirt, sweatshirt, black trousers or shorts or a skirt) the level of cycle use is high as a result.

Comments on Ch. 3 - Barnet’s Vision & Objectives

The vision statements need an additional paragraph referring to the benefits to health, wellbeing, local environments and climate change arising from the provision for active travel, which will be integral to sustainable development.

Concentrating the expected growth in Barnet’s population on key transport corridors and sustainable locations provides an essential and unmissable opportunity to provide for active travel, improving the character of Barnet’s town centres and the health and well-being of the population.

Policy BSS01 Spatial Strategy for Barnet

We suggest that part c) of this policy should include references to active travel (cycling and walking) rather than just public transport as follows:

*c) In order to better manage the impacts of development on the climate **and traffic congestion**, growth will be concentrated in accordance with the Local Plan’s suite of strategic policies GSS01 to GSS13 in the most sustainable*

locations with good public transport connections and active travel provision. Outside of these locations, growth will be supported in places where there is recognised capacity and local character can be conserved or enhanced as a result.

Comments on Ch. 4 - Growth and Spatial Strategy

Much of the proposed growth is in specific areas that will see higher density or along major thoroughfares - which is optimal for cycling. Provision of adequate local services, including nurseries, schools, healthcare, leisure and shops in line with changing demographics, are essential to minimise the need to travel long distances.

Policy GSS09 Existing and Major New Transport Infrastructure

We support development and regeneration close to major transport infrastructure if safe cycling and walking routes are provided in the locality.

Policy GSS11 Major Thoroughfares

An additional 4,900 new homes along Barnet's main road corridors will add to traffic congestion unless the alternatives are much better. For cycling that means installing safe cycle tracks along these corridors, especially on strategic routes like the A5, A1000 and A598.

Policy GSS12 Car Parks

The proviso that car parking spaces will [only] be released if surplus to requirements or re-provided will not drive the sort of change needed to support other policies on active travel and climate change.

Policy GSS13 Strategic Parks and Recreation

We support the establishment of a Regional Park within the Brent Valley / Barnet Plateau area but ask for fuller details of what is proposed. In particular, we ask for good cycling facilities in it on the lines of, say, the Lee Valley Regional Park.

Comments on Ch. 5 – Housing

Policy HOU03 Residential Conversions

When converting existing dwellings to increase occupancy, consideration should be given to provision of adequate and affordable cycle storage.

Policy HOU04: Specialist Housing

Proposals for student accommodation should also demonstrate that they are easily accessible by public transport, cycling and walking, particularly between the accommodation and the educational establishment.

Comments on Ch. 6 - Character, Design & Heritage

Policy CDH03 Public Realm

We support the use of Healthy Streets Indicators, but the policy needs to set minimum acceptance criteria for the healthy streets scores. [Our assessments](#)^v show that Barnet performs poorly compared to most of its neighbouring boroughs. It comes 28th out of 33 and could improve greatly by introducing Low Traffic Neighbourhoods, protected cycle tracks and widespread 20mph speed limits and CPZs.

Comments on Ch. 7 - Town Centres

Policy TOW01 Vibrant Town Centres

This policy fails to recognise that town centres are unattractive because they are dominated by polluting, noisy and dangerous traffic. In towns where traffic has been restricted, footfall has increased and trade has increased, as shown in [this report](#)^{vi} and [this video](#)^{vii}.

Comments on Ch. 8 - Community Uses & promotion of health and wellbeing

Policy CHW01 Community Infrastructure

The study has identified a need for increased pay-and-play accessible water space, equivalent to 2 new swimming pools (6 lane x 25 m) by 2036. None of the four sites mentioned are in town centres or easily reached by sustainable transport and so they all have large car parks. Safe cycling routes and good public transport needs to be provided. In one of the largest London boroughs with inadequate swimming facilities, having to wait until 2036 for increased provision is unacceptable.

Policy CHW 02 – Promoting health and wellbeing

The council needs to do more than “Encouraging implementation of the Healthy Streets Approach, as set out in the draft London Plan”. It needs to take responsibility and lead on this by directing all possible funding towards healthy streets schemes across the borough.

Policy CHW04 - Making Barnet a Safer Place

Accident rates have levelled off with about 100 people killed or seriously injured in road traffic accidents in the Borough every year. This policy needs to include targets for 2035 towards achieving the aim of Vision Zero: no KSIs by 2041.

Comments on Ch. 9 - Economy

Policy ECY03: Local Jobs, Skills and Training

This policy supports training in the construction industry. To support policy ECC01 (Mitigating Climate Change) this policy should include supporting jobs in the industries and infrastructure we need to tackle the climate crisis.

Comments on Ch. 10 - Environment and Climate Change

Policy ECC01 – Mitigating Climate Change

Climate emergency: The Paris Agreement placed a legally binding commitment on the UK to be carbon neutral by 2050. The IPCC now says that emitting carbon at current rates over the next 10 years will breach 1.5 degrees of warming. So the Mayor and some neighbouring boroughs’ current vision is now for a [carbon neutral London by 2030](#)^{viii}. Carbon Dioxide emissions in Barnet stood at 3.3 tonnes per capita in 2016. Barnet also needs to declare a climate emergency and take proportionate action to play its part in meeting the 2030 target of net zero for London.

The planned boom in construction, to increase the population by 15.3%, will increase construction traffic and the associated roadworks will also cause congestion. The increased population living in these developments require extra services and online shopping deliveries, even if they don't own a car themselves.

Some of the proposed sites involve building on green spaces (e.g. Danegrove, High Barnet station, Colindeep lane, Finchley Central, Whalebones Park, Mill Hill East, Watchtower House & Kingdom Hall, Watford Way & Bunns Lane, Woodside Park Station West, Barnet Mortuary). The plan needs to show how losses of green space from these and other sites will be replaced.

Dockless bikes, car share bays and electric vehicles are all needed for a low carbon future. You don't have to be anti-car to be pro-planet, but we will need to ensure people use cars only when they really need to.

This policy ECC01 needs to be strengthened to show how the Local Plan helps to meet the target of net zero carbon dioxide, rather than simply minimising the effect of development on climate change. Policies and plans need to explain how Barnet and its partners will support carbon reduction by:

- making existing homes energy efficient;
- ensuring that Barnet has electric buses;
- creating new green spaces;
- speeding up the installation of solar panels; and
- supporting a dense network of zero-carbon shared mobility by 2024.

Funding may be available from central government and The Mayor's Green New Deal for London.

ULEZ for Barnet: Over 20% of all carbon emissions in London come from road transport. A target date is needed for the ULEZ to cover the entire borough.

Enable cycling: To achieve a major shift to cycling, suitable for a zero-carbon Barnet, adopt strengthened policies for TRC01 – Sustainable and Active Travel.

Policy ECC04 –Barnet's Parks and Open Spaces

This policy lacks commitment to make parks and open spaces accessible by cycle or for cycling within them. Cycle routes to parks and between parks need to be provided and routes through parks and open spaces need upgrading with wider, hard surfaces that separate walkers from cyclists.

Comments on Ch. 11 - Transport & Communications

In this chapter we provide comments on some of the reasoning as well as suggestions for the specific policies.

11.1.1 Specific National and London Plan Policies to be taken into account ADD - and acted upon.

We firmly agree with the statement from the London Plan below. This is the essence of what must be achieved to make a habitable city. Please make sure that active travel is always emphasised:

London Plan – 10.1.4. Rebalancing the transport system towards walking, cycling and public transport, including ensuring high quality interchanges, will require sustained investment including street environments to make walking and cycling safer and more attractive, and providing more, better quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing.

Barnet Council will have to make a considerable step change in provision for active travel, cycling & walking where there have been decades of under investment and lack of maintenance. A street can move far more pedestrians, cyclists and bus passengers per hour than it can people in cars. We have to recognise that it is ridiculous to prioritise the least efficient means of moving people and the most damaging form of movement. Parked cars and heavy traffic both have a huge impact on the efficiency and safety of active travel.

11.2.1 COMMENT - We endorse this introductory statement and strongly support the investment in orbital links with priority given to active travel.

It is no surprise that cycling mode share has remained at just 1%. When cycling policy has been referred to in Barnet Council reports over previous years, there has been a serious lack of commitment to provision that would encourage and facilitate safe cycling, apart from cycle training schemes and cycle parking. With little provision for progressing cycling as active travel, how many pupils have continued to cycle on the borough road network?

11.3.3 ...at their current rate, bus passenger numbers will decline by 14% every ten years, putting the future of the bus network under threat. COMMENT - improvements to the bus network need to be addressed 2020-2025 as a matter of urgency in order to redress the current situation and safeguard the future of the bus sector.

11.3.4 For Barnet to achieve a reduction in dependence on private vehicles orbital travel needs to be radically improved. ADD -by investment in public transport, walking and cycling.

11.4.3 Cycling is becoming a more important transport mode in Barnet. Low take-up (1% of all trips) has historically been associated with the typography of Barnet. COMMENT - The low take-up is primarily associated with serious lack of infrastructure and a hostile road environment exacerbated by lack of action by council. For those who have been put off cycling due to hills, the rapid increase in take-up of e-bikes will mitigate any apparent disadvantage.

...The Barnet LIP strongly supports the delivery of attractive and accessible cycle links especially in development areas ADD - and connecting to those developments.'

11.4.7 *Reducing discretionary car use, particularly for short car journeys will be key to improving air quality* **COMMENT** - Air pollution is thought to have caused 64,000 deaths in the UK in 2015, including 17,000 fatal cases of heart and artery disease. Improving air quality near schools is vital but how does the council intend to improve air quality in general outside the NCR?

11.4.9 *The Council will seek to ensure that any new transport interchanges are designed* **ADD** - and improvements to existing interchanges made - *to help address personal safety issues and reflect Secured by Design.*

11.4.10 *It will also take positive action to prevent any pupil parking, promoting car sharing,...* **ADD** and relaxing school uniform rules... It will play its part by providing safe cycle routes, providing 'school streets', Low Traffic Neighbourhoods and 20 mph speed limits to enable more children to walk and cycle to school safely.

11.4.12 *...and by comprehensively tackling the school run.* **ADD** ,ensuring that school travel plans include ambitious targets for walking and cycling.

Policy TRC01 – Sustainable and Active Travel

The thrust of this policy is to minimise the adverse effects of development. By saying the Council will "Refuse proposals that have an unacceptable impact on highway safety or a severe impact on the road network" without defining 'unacceptable' and 'severe', it is actually saying that some impact on highway safety and congestion is acceptable (contravening policies CHW04 and ECC01).

While "attractive and an accessible cycle links especially in development areas" and "good quality walking surfaces and off-road cycle routes" and adoption of the Healthy Streets approach are all welcome, these should not be confined to development areas.

These improvements will have very little impact on modal shift away from private car use unless they are accompanied by further measures in this policy that make active travel safer, easier and cheaper than using the car.

1. Providing Low Traffic Neighbourhoods (LTNs) in all residential areas by 2030, which prevent through traffic, but retain permeability for active travel (bus, walking & cycling).
2. Making 'School streets' the default arrangement, which close roads outside schools at the start and end of the school day.
3. Increasing parking charges for larger and more polluting vehicles.
4. Ensuring that Barnet is "Smart Road User Charging ready" by 2024 as part of a London-wide scheme.
5. Supporting a dense network of shared mobility schemes by 2024.

This policy needs to do much more to enable people to choose cycling as their preferred mode of sustainable transport.

6. Develop a programme on a large scale that will motivate people to cycle their daily journeys, help them to get a bike, provide storage for it and teach them how to maintain it.
7. In parallel, develop programmes that discourage use of private vehicles, including PHVs, for journeys into, through or within Barnet.
8. Provide the infrastructure and traffic conditions that will make people feel it is safe and convenient to cycle:
 - Build 50% of the prioritised strategic cycling corridors (as identified in TfL's Strategic Cycling Analysis) by 2024 and 100% by 2030.
 - Match other boroughs and TfL by moving to a general 20 mph speed limit.
9. Promote ownership and usage of E-bikes by committing to the installation of charging points within cycle storage areas and working with TfL to deploy hire-Ebikes at locations within the Borough.

Policy TRC02 – Transport Infrastructure

The plan recognises the need to invest in public transport lines and interchanges and we support investment in orbital and radial public transport. Secure cycle storage / stands should be provided near key bus stops to enable mode sharing: e.g.: cycling a short distance and then catching the bus to travel further is particularly useful for longer or hilly orbital journeys like Routes 251, 107, 307. Planners should ensure that cycle parking is adequate and easily visible to public view to discourage theft and that secure "cycle hubs" are provided at large busy stations.

It also claims that bus journeys are slower than car journeys (ignoring stopping at bus stops), although it's hard to see why as cars cannot usually overtake buses and buses could use bus lanes, bus gates and be given priority at traffic lights. It is true that cycling speeds can be faster than motor traffic, especially when segregated cycle lanes are provided. It is vague on plans for infrastructure that will enable people to use buses, walking and cycling to reach new train and underground stations.

Barnet needs to provide infrastructure for buses and to enable people to cycle safely around the borough.

1. Support more bus lanes and the introduction of bus gates in healthy streets neighbourhoods to make bus journeys more efficient than car journeys.
2. Complete a borough-wide cycle network by 2030, based on TfL's Strategic Cycling Analysis, with enhancements where further needs can be identified.
3. Develop area-wide healthy streets neighbourhoods (low traffic neighbourhoods) to cover the entire borough by 2030 - it is not sufficient to confine healthy streets to new developments and occasional public realm schemes.
4. Provide secure cycle parking and cycle hubs.

Policy TRC03 – Parking Management

This policy focuses on what’s allowed in new developments but needs to extend borough wide. It needs to support policies ECC01, TRC01 and TRC02 to discourage private car use and favour active travel by:

1. Restricting parking on bus routes to allow free passage for buses and cyclists.
2. Extending bus lanes on the wider main bus routes and making them operational 7 days a week.
3. Increasing parking charges for larger and more polluting vehicles in car parks, CPZs and on street.
4. Providing economical, secure cycle parking for every resident – using on street bike hangers where needed in place of parking spaces.
5. Enforcing the ban on pavement parking and committing to a phased reduction in on-street parking.
6. Providing car club vehicle parking where appropriate.
7. Restricting the types of vehicle allowed to park in new developments to smaller and less polluting models or electric vehicles.
8. Assisting residents with personal travel planning and rewarding residents who give up car ownership, allowing Barnet to meet the residential parking standards given in the draft [London Plan](#)^{ix} (rather than the increased levels proposed in Table 23).

Policy TRC04 - Digital Communication and Connectivity

This policy needs to recognise the value of enabling working from home to reduce the overall need to commute, not only to travel outside peak periods.

Comments on Ch. 12 - Delivering the Local Plan

The 2012 version of the Infrastructure Delivery Plan only had a few ‘critical’ and ‘necessary’ items on walking & cycling for 2011-16.

Type of infrastructure	‘critical’ & ‘necessary’
Transport	£12,200,000
Highways	£110,341,000
Parking	£600,000
Cycling & pedestrians	£328,000
Movement and connectivity total	£131,821,000

This was just 17 pence per person per year and only 2.5% of the total cost on movement and connectivity, the majority of which was on highways. With ongoing delays to schemes in North Finchley and Brent Cross, it would be useful to know how much has been spent since 2011 on walking and on cycling and what has been delivered.

Studies have consistently shown that [investment enabling people to cycle](#)^x has a far higher benefit to cost ratio than investment in other transport modes – at least 5:1 and up to 20:1 or more in some cases.

It is clear that a step change is possible to significantly increase the proportion spent on walking and cycling. This will be necessary to deliver the aims that are needed in Barnet's Local Plan.

In contrast to the minimal current levels of spending on walking and cycling in Barnet, the House of Commons Transport Committee has called for increased and sustained investment and have [evidence](#) that 5% of transport spend, rising to 10% after 5 years is needed^{xi}. Nationally, this would amount to £17 per person annually in 2020/21, rising to £34 per person in 2024/25.

For the next stage of consultation, we urge the Council to publish a revised Local Plan and the associated IDP that takes walking and cycling seriously and commits to ambitious interventions, target dates and spending.

Sincerely,

Charles Harvey
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[Barnet Cycling Campaign](#)
13 Mar 2020

Hyperlinks used in this document are listed on the next page.

- i Enjoy Waltham Forest <https://www.enjoywalthamforest.co.uk/work-in-your-area/>
- ii Support for low traffic in Fox Lane area in Enfield: <http://betterstreets.co.uk/yes-to-low-traffic-in-the-fox-lane-area/>
- iii A guide to Low Traffic Neighbourhoods <https://lcc.org.uk/pages/low-traffic-neighbourhoods>
- iv Enfield gets its first School Streets: <http://betterstreets.co.uk/school-streets-come-to-enfield/>
- v LCC healthy streets scores for London boroughs: <https://lcc.org.uk/articles/healthy-boroughs>
- vi Waltham Forest mini-Holland evidence: <https://wfcycling.wordpress.com/mini-holland/evidence/#LocalEconomy>
- vii Cycling in London and Holland: <https://youtu.be/zq28fU2AuMU>
- viii Enfield declares climate emergency: <https://new.enfield.gov.uk/news-and-events/council-declares-climate-emergency/>
- ix Residential parking in The London Plan: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-10-transport/policy-t61-residential-parking>
- x Value of cycling report: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509587/value-of-cycling.pdf
- xi Transport Committee - Active travel: increasing levels of walking and cycling in England <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/148708.htm>