



Jamie Blake
Strategic Director for Environment
London Borough of Barnet
Via email

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

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Phone 020 7222 5600
www.tfl.gov.uk

Dear Jamie,

Barnet's draft Local Implementation Plan

Thank you for submitting the London Borough of Barnet's draft Local Implementation Plan (LIP) to TfL for consultation.

London's boroughs play a vital role in delivering the Mayor's Transport Strategy (MTS) and helping to achieve the ambitious target for 80 per cent of all trips in London to be undertaken by active, efficient and sustainable modes of travel by 2041. That is why this third round of LIPs is so important in demonstrating how the MTS will be implemented at a local level across the city.

Colleagues at TfL have reviewed your consultation draft submission. The intention of our assessment is to be constructive in assisting you to achieve approval. I enclose here detailed comments for your consideration ahead of the final draft LIP submission to TfL on 16 February 2019.

Final approval of the LIP will be a matter for the Mayor. There are many elements of the London Borough of Barnet's consultation draft LIP which are welcomed. However, our review has identified a number of matters we consider necessary to be reviewed and strengthened. Addressing these issues in full is required for the London Borough of Barnet's LIP to meet the necessary standard we believe the Mayor would consider adequate for approval, in accordance with the conditions set out in section 146 of the GLA Act (1999).

A summary of our key comments is as follows:

- The borough objectives are welcomed. However, they need to demonstrate a stronger commitment overall to supporting a reduction in car dependency to ensure consistency with the MTS.
- The borough needs to clarify their commitment to achieving Vision Zero by 2041 and should strengthen their objectives for this Outcome through the provision of greater detail.

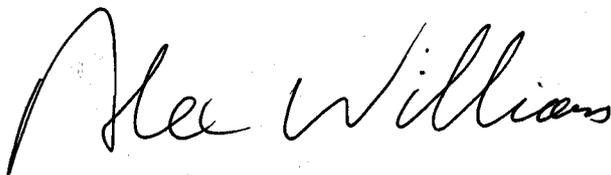
- The borough is asked to strengthen their objectives throughout the LIP through the provision of greater detail. By doing so, the LIP would more strongly demonstrate how the borough intends to achieve its short and longer term Outcome indicator targets.
- The borough is asked to provide more detail on proposals for the delivery of strategic and local cycle routes in Barnet.
- A commitment needs to be made in the borough objectives to achieve at least 95 per cent of bus stops in Barnet as wheelchair accessible by 2025 in accordance with the MTS Accessibility Implementation Plan (Figure 20 in the MTS).
- More detail needs to be provided in the supporting commentary for the Three-Year Indicative Programme of Investment.
- The borough needs to set 2041 targets for Outcome 1b and Outcome 2 and review the targets set for Outcome 3c and Outcome 4.

A list of detailed comments is enclosed in the annex to this letter. We look forward to continuing to work with the London Borough of Barnet over the coming months as you finalise your LIP. My team will contact your officers to request a follow-up meeting to discuss our feedback. In addition, I request that you write to me confirming receipt of this letter and outline in your reply how you will amend your LIP in response to our comments.

Please do not hesitate to contact us going forward should anything in our response require clarification or if you need any support with the further development of the LIP. The key contacts for the London Borough of Barnet are:

Joseph Phelan, Transport Strategy
Ahilan Kanagasabesan, Network Sponsorship

Yours sincerely

A handwritten signature in black ink that reads "Alex Williams". The signature is written in a cursive, flowing style.

Alex Williams
Director of City Planning
Email: alexwilliams@tfl.gov.uk
Direct line: 020 3054 7023

Annex: Third Local Implementation Plan – Consultation Feedback Form December 2018

Borough name: LB Barnet

1. LIP Guidance Requirements

- 1.1. Requirement 1 – Draft LIP follows the template structure and provides a response to all requirements.
- 1.2. Requirement 12 – Regard is given to the draft London Plan, Mayor's Environment Strategy and Health Inequalities Strategy. More detail could be provided on how other Mayoral strategies have influenced the LIP.

2. Objective Setting – Mode Share

- 2.1. The draft LIP sets a number of borough objectives contributing to achievement of the borough's overarching mode share aim. Objectives include promotion of active travel, application of Healthy Streets principles to deliver improvements, promoting and enabling more sustainable travel, improving orbital public transport connectivity and securing growth in opportunity areas based on sustainable development. These objectives are welcomed.
- 2.2. **However, the borough is asked to strengthen their objectives throughout the LIP through the provision of greater detail. By doing so, the LIP would more strongly demonstrate how the borough intends to achieve its short and longer term Outcome indicator targets, including for mode shift.**
- 2.3. For example, given the key challenge highlighted in the draft LIP in relation to the necessity for improved orbital public transport connectivity, the LIP could provide much greater detail on the borough's short and longer term aspirations, in particular in relation to enhanced orbital bus provision. In addition, the borough is asked to provide much greater detail on their aspirations for the delivery of strategic and local cycle routes.

- 2.4. Moreover, the objectives could be stronger on the borough's intentions to support efficient freight in Barnet, namely in the context of town centres and new developments.
- 2.5. Given the significant growth anticipated in Barnet, there is much opportunity to facilitate mode shift through supporting car-free and car-lite development in the borough's more connected areas. The draft LIP does recognise this opportunity and makes a commitment to promote sustainable development in Barnet's opportunity areas. There is also reference in Objective D to "applying controls round car-free and car-lite development" and "introduction, extension and review of CPZs". This is welcomed. However, the borough could make a stronger commitment in their objectives to facilitating mode shift through supporting car-free and car-lite development in accordance with public transport improvements over time.
- 2.6. The LIP could be much stronger in outlining how, short and longer term, the borough will encourage reduced car use through walking, cycling and public transport improvements (i.e. 'carrot' measures) given the stated reluctance to introduce 'stick' measures to discourage car use in the less dense suburbs.
- 2.7. The MTS is not about being anti-car but supporting people to travel without having to rely solely on cars. The 'changing the transport mix' section of the LIP could give this much greater recognition, in particular opportunities for car dependency to be reduced through supporting walking and cycling for short trips, as well as over time through improved orbital public transport connectivity and support for Good Growth.
- 2.8. **The borough objectives need to demonstrate a stronger commitment overall to supporting a reduction in car dependency to ensure consistency with the MTS.**
- 2.9. Additionally, it is important for the borough to clearly indicate short term objectives stating their intentions for delivery for the period to 2021/2022. These objectives would sit under the longer term overarching policy objectives.
- 2.10. Also, it would be beneficial to outline the current transport mix (i.e. mode share breakdown) in this section.

3. Objective Setting – MTS Outcomes

- 3.1. *Outcome 1*

- 3.1.1. The draft LIP identifies a number of objectives for the purpose of achieving this Outcome. There is a commitment to develop a strategic network for walking and cycling, including cycle routes reflecting TfL's Strategic Cycling Analysis. There are also objectives to deliver improvements through the application of Healthy Streets principles, including in town centres and development areas, as well as Liveable Neighbourhoods in Colindale and Brent Cross. Included in the challenges and opportunities commentary there is reference to plans currently in consultation for improving cycle and walking access to local facilities such as Copthall Sports Hub. Other borough objectives are identified to deliver against this Outcome, including road safety improvement measures and promoting more sustainable travel. These objectives are welcomed.
- 3.1.2. However, it has not been made clear in the objectives or supporting commentary what the borough's specific short and longer term aspirations are for the delivery of a strategic cycle network. Although potential corridors are recognised and cycling potential analysis has been undertaken, it has not been made explicit what the borough's intentions for the delivery of strategic cycle routes over the period to 2021/22 and longer term to 2041 are, other than delivery of the in-development North Finchley to Hornsey Quietway.
- 3.1.3. Moreover, it is not clear what the borough's aspirations are in terms of the delivery of local routes to complement the development of a strategic cycle network (in accordance with Proposal 3b of the MTS) over the short and longer term.
- 3.1.4. **Hence, the borough is asked to provide more detail on proposals for the delivery of strategic and local cycle routes in Barnet.**
- 3.1.5. Figure 7 (page 37) is a useful inclusion in the LIP. However, it does not identify Strategic Cycling Analysis 'medium' potential corridors. This would be very beneficial to identify prioritised routes for delivery and enable comparison to existing routes which could be upgraded to form part of the strategic network. On the basis of this analysis, the borough could then map the strategic and local cycle network intended for delivery by 2021/2022. Longer term aspirations for 2041 could also be outlined.
- 3.1.6. More detail could be provided on the specific nature of the Healthy Streets improvements that will be delivered under Objective B. Greater detail on the locally specific barriers to walking and cycling that will be addressed could also be outlined.

3.1.7. The borough should also outline proposals for enhanced provision of cycle parking or 'soft' measures such as cycle training, behaviour change initiatives or community engagement to support an increase in cycling for shorter trips in Barnet.

3.2. *Outcome 2*

3.2.1. Chapter 2 of the draft LIP outlines the borough's objective to seek to achieve Vision Zero for road danger (no KSIs) by 2041. This is strongly welcomed. However, a concern is raised in the executive summary regarding the achievability of Vision Zero "given the numbers of strategic roads in the borough and the reality that only a complete removal of all traffic can truly deliver zero serious accidents." Moreover, in setting targets for KSI reduction (page 96), the borough affirm their commitment to Vision Zero but not necessarily its achievement by 2041.

3.2.2. **Hence, the borough needs to clarify their commitment to achieving Vision Zero by 2041.**

3.2.3. The draft LIP identifies a number of policy objectives for the purpose of achieving this Outcome. The main policy objectives are "programmes of road safety, education, training and publicity"; "targeted engineering schemes to address collision hot-spots, including major proposals that apply Healthy Streets principles"; and "delivery of 20mph areas around schools and other areas where pedestrian activity is high". These objectives are welcomed.

3.2.4. **However, the borough should strengthen their objectives for this Outcome through the provision of greater detail.**

3.2.5. For example, the borough is asked to indicate what specific road safety, education, training and publicity measures they intend to deliver. The draft LIP identifies a proportional increase in pedal cycle and motorcycle KSIs in Barnet. As such, training and education could focus on these particular vulnerable road user groups.

3.2.6. The borough objective to use a targeted engineering approach to address collision hot-spots is welcomed. However, more detail could be provided on specific locations and measures, based on any spatial analysis undertaken. The borough is also asked to make a commitment in their objectives to the robust monitoring of infrastructure schemes, entering them on to TADS.

3.2.7. The borough is also asked to give consideration to the Safe Systems pillar of 'safe vehicles'. Measures the borough could implement in

relation to this include promoting a work-related road risk policy to address the borough fleets.

- 3.2.8. In relation to improving security and reducing fear of crime, the borough is asked to set a specific objective in relation to this and give consideration to the appropriate use of HVM.

3.3. *Outcome 3*

- 3.3.1. It is stated in the draft LIP that the borough does support the aim of reducing reliance on private car use. This is welcomed. A number of challenges are highlighted, in particular, that the borough does not have direct control over key roads in the borough (including the A1, M1, A41 and A406), and that many car trips across Barnet have origins and destinations outside the borough. On this basis, the borough should emphasise in this section their commitment to working with key stakeholders such as TfL and neighbouring boroughs/local authorities to achieve the borough's traffic reduction targets.

- 3.3.2. The draft LIP also outlines that maximum parking levels for residential development in the borough are anticipated to reduce towards draft London Plan levels in the future. This is welcomed.

- 3.3.3. It is also stated that in the less dense suburbs car use and ownership "should not be made more difficult than it needs to be". To reiterate, the MTS is not about being anti-car but supporting Londoners in moving around the city without having to rely solely on car use. **A stronger commitment needs to be made in this section to supporting a reduction in car dependency.**

- 3.3.4. The borough is asked to outline more explicitly their commitment to reducing traffic in Barnet through the prioritisation of space-efficient modes of travel (in accordance with Policy 5 of the MTS). This is important given the high levels of growth anticipated in Barnet. The contemporary challenges in Barnet are acknowledged. However, the LIP could give greater recognition of the opportunities presented by new development and enhancement of public transport connectivity and services over time in facilitating a reduction in car use.

- 3.3.5. The draft LIP identifies a number of proposals under Objective D for the purpose of achieving this Outcome. This includes school travel planning and STARS, piloting school street closures (resident access only at certain streets around some schools), travel planning for new developments, review of on-street parking provision including introduction, extension and review of CPZs and making provision for car clubs. Supporting objectives include proposals to enhance public transport provision in the borough, including bus priority improvements

and orbital express bus provision. These objectives are welcomed.
However, the borough is asked to strengthen these objectives.

- 3.3.6. As stated previously, the significant levels of growth projected in Barnet provides the opportunity to support car-free and car-lite development in the more connected areas in the borough. There is reference in the objectives to “applying controls around car-free and car-lite development” and the statement that “the level of development in Barnet provides opportunities to introduce or pilot new or innovative approaches to transport with lower levels of parking in accessible areas” is strongly welcomed. However, a stronger overall commitment could be made to supporting car-free and car-lite development in the more connected locations in Barnet in accordance with public transport improvements over time. This would support achievement of the borough’s targets to reduce traffic and car ownership levels to 2041. This would also build on commentary already provided on plans for improved walking, cycling and public transport provision in the context of new development (Brent Cross, Colindale and North Finchley), as well as Objective H. This is also important given the stated reluctance to make car use more difficult in the “less dense suburbs”.
- 3.3.7. Moreover, a strengthening of the borough’s objectives for the development of a strategic and local cycle network, enhanced orbital bus connectivity and bus priority – namely through the provision of greater detail – would also be beneficial in relation to this Outcome.
- 3.3.8. A challenge highlighted is in relation to the large number of faith schools with extended catchment areas in the borough. On page 6 of the draft LIP it is stated that “school travel planning doesn’t adequately tackle the challenges in this situation and further measures, including improved public transport options, may be needed.” The borough is asked to indicate in their objectives on school travel planning how this specific challenge will be addressed.
- 3.3.9. The borough’s commitment to travel planning for schools and new developments is welcomed. The borough is asked to give consideration to workplace travel planning and behaviour change, in particular in those locations already well connected by public transport.
- 3.3.10. The borough’s intention to support car club provision is welcomed. However, this should be linked to a reduction in the availability of private parking, in accordance with Proposal 19 of the MTS.
- 3.3.11. In relation to freight, the borough is asked to provide more detail on their planned freight consolidation strategy. The borough is also asked to indicate the measures likely to be adopted in Barnet in accordance with

the work to be undertaken as part of the North London Freight Study. In particular, the borough should give consideration to measures to support efficient freight deliveries in town centres.

3.4. *Outcome 4*

3.4.1. A number of policy objectives for the purpose of achieving this Outcome have been identified. Key objectives include facilitating implementation of identified measures from the school air quality audits, pressing for a sub-regional extension and tightening of the ULEZ, delivering open access EV charge points, facilitating car-free days and events and increasing greening and tree planting. These objectives are welcomed.

3.4.2. **However, the borough is asked to strengthen their objectives.** Of the 14 air quality focus areas identified in Barnet, it is indicated in the draft LIP that 9 are associated with the TLRN or M1. The borough is asked to identify those 5 focus areas not associated with these road networks and indicate what specific measures will be used at these locations to address air quality issues.

3.4.3. The borough's commitment to deliver open access EV charge points in Barnet is welcomed. The borough is asked to consider measures to support the identification of sites for rapid charging points and support development of a rapid charging network for commercial fleets (taxis, PHVs and freight vehicles).

3.4.4. Although referenced elsewhere in the draft LIP, the borough is asked to give greater recognition to SuDS in this section.

3.5. *Outcome 5*

3.5.1. The draft LIP outlines the borough's intention to enhance public transport connectivity and services in the borough, in particular in relation to orbital travel. Key objectives include supporting and facilitating introduction of the WLO line and Crossrail 2 to New Southgate and working with TfL to realise the delivery of orbital express bus provision and demand responsive public transport. These objectives are welcomed.

3.5.2. The key focus for boroughs in relation to this Outcome is supporting mode shift from car use through the delivery of complementary street and public transport improvements to provide an attractive whole journey experience (Policy 10 of the MTS). However, borough Objective B – “to apply Healthy Streets principles, to deliver a range of improvements” is only cited as a supporting objective for achievement of this Outcome.

- 3.5.3. **As such, the borough is asked to place more emphasis on this objective in the context of this Outcome.** Moreover, the borough is also asked to provide more detail on how they will support the provision of an improved whole journey experience to facilitate mode shift away from the car, building on the existing commentary. For example, in relation to Objective B, more detail could be provided on the specific nature of the Healthy Streets improvements envisaged for particular transport hubs, especially in terms of enhanced priority for sustainable modes and improved access by walking and cycling.
- 3.5.4. Given the emphasis placed in the draft LIP on the need for improved orbital public transport connections in Barnet, the borough is asked to provide greater detail on their aspirations for orbital express bus provision and demand responsive public transport. It is recognised that this will be explored in the borough's emerging long term transport strategy. However, it would be beneficial if greater detail could be provided in the LIP, for example particular routes or locations the borough considers to be a priority.
- 3.6. *Outcome 6*
- 3.6.1. The draft LIP identifies a number of policy objectives for the purpose of achieving this Outcome. The borough indicate that they will support step-free proposals for Mill Hill East, Burnt Oak, Colindale and Brent Cross LU Northern Line stations, deliver the new Brent Cross West station with step-free facilities and support Network Rail to deliver step-free facilities for Mill Hill Broadway station. There is also a commitment to increase the percentage of accessible bus stops in the borough from 91% to 98%. These objectives are welcomed.
- 3.6.2. **However, a commitment needs to be made in the borough objectives to achieve at least 95 per cent of bus stops in Barnet as wheelchair accessible by 2025 in accordance with the MTS Accessibility Implementation Plan (Figure 20 in the MTS).** The Equalities Act (2010) places a duty on both public transport operators and highway authorities to provide reasonable adjustments so that disabled passengers are not disadvantaged. Providing access between a low-floor bus (fitted with ramps) and the footway is crucial to fulfilling these duties.
- 3.6.3. The borough is also asked to indicate any longer term aspirations for delivering step-free accessibility at stations in the borough, in addition to the proposals already identified.
- 3.7. *Outcome 7*

3.7.1. The draft LIP set the objective for the borough to “deliver programmes of Bus Priority improvements, especially focusing on locations that provide benefits for buses serving development areas, orbital movement and higher passenger numbers.” This objective and the supporting commentary in the challenges / opportunities section are welcomed. The main objective set in the draft LIP for Outcome 7 is Objective F, which is also the main objective set for Outcome 5. Whilst there are interrelationships between these two outcomes, the key focus for boroughs in relation to Outcome 7 concerns improving bus journey times and journey time reliability.

3.7.2. **As such, the borough is asked to provide specific policy objectives for Outcome 7 on this basis, thus strengthening their commitment to the delivery of Bus Priority improvement programmes.**

3.7.3. For example, the statement in the challenges / opportunities section that “Healthy Streets improvements on major roads provide opportunities to re-balance the provision of road space to provide facilities that better support bus movements” is strongly welcomed. The supporting commentary in the challenges / opportunities section (in particular the final paragraph on pages 55-56) would form the suitable basis for the determination of borough objectives.

3.7.4. In setting objectives on this basis, the borough is asked to consider their plans in relation to managing kerbside space and restricting parking to minimise delays to buses, installing more bus lanes and extending bus lane operating hours.

3.7.5. More detailed analysis of the specific challenges in Barnet in relation to bus speeds and journey time reliability could be provided, in particular in terms of spatial analysis.

3.8. *Outcomes 8 and 9*

3.8.1. The borough’s intention to seek to “secure sustainable transport in relation to all developments and to maximise active travel to new development sites” is welcomed. As stated previously, the Council’s review of its car parking policy in its local plan with an expectation of moving towards the draft London Plan standards is also welcomed and will be an essential element to ensure that new development is sustainable.

3.8.2. **Given the high levels of growth projected in Barnet, the borough is asked to strengthen Objective H.** As stated previously, the borough could be stronger in making a commitment to support car-free and car-

lite development in Barnet's more connected locations in accordance with public transport improvements over time. It is recognised that there is reference to "applying controls around car-free and car-lite development" in Objective D under Outcome 3 and it would be suitable to articulate this more strongly in the context of Outcomes 8 and 9.

- 3.8.3. Moreover, in the context of high growth, the need to use street space efficiently will increase and it may not be possible to accommodate higher levels of car ownership, particularly in the better connected areas of the borough. Additional on-street parking controls, in particular, may be necessary in areas of permit-free residential development with no or low parking if these are to come forward successfully. As such, the borough is asked to consider in their LIP the need to reduce high car ownership levels over time in accordance with improvements to public transport links, concentrating measures in areas with greater public transport access.
- 3.8.4. Alongside limiting parking provision and improvements to public transport, walking and cycling infrastructure, the borough should also outline other measures to support reduced car dependency in the context of new development. For example, car club provision in lieu of private car parking and cycle parking and storage provision.
- 3.8.5. The borough objectives in relation to rail freight and construction consolidation are recognised, in addition to the work the borough will undertake on a North London Freight Study. However, the borough is asked to provide more detail on 'efficient freight' in relation to deliveries and servicing in the context of new developments.

4. Borough Targets

- 4.1. *Outcome 1*
 - 4.1.1. The Outcome 1a indicator does include walking and cycling for leisure and going for a run is included as a walk trip in the LTDS travel diary.
 - 4.1.2. **A target has not been set for 2041 for Outcome 1b and no explanation has been provided for this. The borough needs to set a target for 2041 and this should be set in accordance with the trajectory in the MTS borough data pack.**
 - 4.1.3. The 2021 trajectory is based on the delivery of measures outlined in the TfL Business Plan to 2021/2022. The Strategic Cycle Network is defined as routes that serve key corridors of demand (as identified by the Strategic Cycling Analysis), routes that are in line with the LCDS (high

quality infrastructure design, direct alignments etc.), and routes that fit into the wider network (i.e. link to other planned routes).

4.2. Outcome 2

4.2.1. The borough's commentary in relation to Vision Zero is acknowledged. **However, the borough needs to set a target set of 0 KSIs for 2041 in accordance with Policy 3 of the MTS.**

4.2.2. Following the moves to new collision reporting systems – the Case Overview and Preparation Application (COPA) for the Metropolitan Police Service and Collision Reporting And Sharing (CRASH) for the City of London Police – we have now completed initial back estimates for the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 (contained in the 2017 'Casualties in Greater London' factsheet, available on the TfL website alongside supporting data tables at: <https://tfl.gov.uk/corporate/safety-and-security/road-safety>).

4.2.3. We will issue a revised set of borough trajectories for Outcome 2 and Vision Zero and need boroughs to update their targets to reflect these new trajectories in their final LIP for 2022 and 2030 (2041 is unchanged at 0). The level of ambition remains unchanged, despite these revised figures. The borough is also asked to include the following text in the final LIP under Outcome 2 explaining the reasoning for the change in trajectories and targets:

'The Metropolitan Police Service (MPS) introduced a new collision reporting system in November 2016 - the Case Overview and Preparation Application (COPA). The City of London Police also moved to the Collision Reporting And SHaring (CRASH) system in October 2015. This has had a number of impacts on the data that is available to Transport for London (TfL), and the London Boroughs in the ACCSTATS database for collision investigation.

Under the new systems officers use an 'injury-based assessment' in line with DfT STATS 20 guidance and online self reporting is available. Both of these changes are expected to provide a better assessment of injury occurrence and severity but have made data collected from November 2016 onwards difficult to compare with earlier data.

TfL commissioned the Transport Research Laboratory (TRL) to undertake a back-casting exercise to enable pre November 2016 data to

be compared with post November 2016 data. These initial back cast estimates include the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 and this data has been used to update borough targets to align with those contained in the Mayor's Transport Strategy, namely a 65 percent reduction in KSIs by 2022 against the 2005-09 baseline, a 70 percent reduction in KSIs by 2030 against the 2010-14 baseline and zero KSIs by 2041. The targets contained in this final version of our LIP have been set against Outcome 2 for Vision Zero to reflect the reporting changes. The level of ambition remains unchanged, despite these revised figures.'

4.3. Outcome 3

- 4.3.1. The borough's commentary in relation to their target setting for car ownership is acknowledged. **However, the borough should set a target for 2041 in accordance with the MTS borough data pack trajectory.**
- 4.3.2. Growth in Barnet, if delivered in accordance with the transport principles of Good Growth, offers the significant opportunity over time to reduce car ownership levels in the borough. Given the considerable levels of development projected in Barnet, in addition to the scope of change anticipated to be delivered based on implementation of the MTS, it is not unreasonable to set a target for 2041 in line with the MTS borough data pack trajectory.
- 4.3.3. The borough's commitment to the traffic reduction trajectory also suggests greater ambition could be demonstrated in relation to reducing car ownership levels.
- 4.3.4. It is not unreasonable for the borough to set a target for 2021 which deviates from the MTS borough data pack trajectory, recognising that changes in travel behaviour will happen over time in accordance with new development and improved public transport and active travel provision in the borough. This is also based on the evidence provided in the draft LIP.
- 4.3.5. However, the borough is asked to set a target for 2021 which demonstrates an intention to reduce car ownership levels over the shorter term. To reiterate, reducing car ownership levels is not about being anti-car but providing people with opportunities to lead car-free lifestyles and supporting mode shift to active, efficient and sustainable modes.

4.4. Outcome 4

4.4.1. The borough's commentary in relation to their target setting for Outcome 4 is acknowledged. However, the MTS trajectories are not based on bringing forward the date for 100% zero emission road transport to 2041 and the MTS does not seek to do this. The statement that "emissions from electric vehicle charging from the mains being about one third of those for diesel power" does not appear to take into account that the CO₂ emissions of vehicle km driven by electric vehicles will decrease over time, as the grid emissions intensity of the national grid decreases. TfL modelling for the MTS trajectories follows BEIS projections of this intensity with 2041 emissions at c50 gCO₂e / kWh, c80% lower than the MTS base year. Moreover, in relation to the fleet composition, TfL's strategy scenario for the MTS is for c87% of car km in London to be driven by Ultra Low Emission Vehicles in 2041, with all road vehicles reaching zero emission by 2050. In relation to NO_x, Barnet will benefit from the ULEZ expansion and LEZ strengthening. In relation to PM emissions, a reduction in emissions levels is more contingent on traffic reduction than changes in fleet composition due to the effects of tyre and brake wear and the borough have set targets for traffic reduction in line with the MTS borough data pack trajectory.

4.4.2. **On this basis, the borough needs to review their targets for Outcome 4 which should be set in accordance with the Outcome indicator trajectories in the MTS borough data pack.** In particular, the borough should demonstrate their intention to achieve zero emission road transport by 2050 in accordance with the Zero Emission Road Transport Timeline in the MTS (Figure 15).

4.5. *Outcome 5*

4.5.1. This is trips by borough of residence.

5. Delivery Plan – Longer Term Interventions to 2041

5.1. The borough is asked to provide further supporting commentary. Table 8 could be strengthened through the identification of any additional interventions the borough considers necessary to deliver the MTS in Barnet over the longer term.

5.2. In addition, the borough is asked to cross-reference their objectives against Table 8 to ensure the full remit of their longer term aspirations for delivery against each Outcome is captured.

- 5.3. Some interventions included in Table 8 could be referenced more explicitly in the borough objectives section.

6. Delivery Plan – Three-Year Indicative Programme of Investment

- 6.1. In the supporting commentary for the Three-Year Indicative Programme of Investment, it is stated that a “long list of proposals that aim to deliver the borough transport objectives for the three year programme has been identified from officers across the council and partner organisations.” However, this list has not been referenced.
- 6.2. **More detail needs to be provided on the nature of the measures that are to be implemented under each of the intervention categories.**
This would not necessarily go into the same level of detail as the Annual Programme but would provide an indication of the type of measures (including scheme-specific detail, locations and timeframes) that will be delivered across the three years and provide more detail on the borough’s intentions than currently outlined in the supporting commentary.
- 6.3. It is also not clear if the proposals listed in Table 5 are to be delivered only in 2019/20 or if this table also includes measures which will be delivered in years 2 and 3 of the Three-Year Indicative Programme of Investment. The borough is asked to clarify this.

7. Delivery Plan – Annual Programme

- 7.1. Comments on the Annual Programme (Proforma A) will be provided separately via the borough’s Network Sponsorship contact.