

Harrow New Local Plan 2021-2041

CSD11A - Schedule of Proposed Modifications

(Version 2)

8 May 2025

The following schedules set out a number of proposed modifications to the Regulation 19 Version of Harrow's emerging Local Plan, for the Inspector to consider during the examination process. This document has been updated in response to the Inspector's letter dated 24 April 2025 (LBH/ED4).

The modifications reflect the Council's objective to resolve as many objections as possible ahead of the hearing sessions and reflect constructive, on-going dialogue with representors, which in some cases is or will be reflected in Statements of Common Ground.

For the most part, modifications are proposed to provide greater clarity to the policy wording or supporting text. We suggest that only a limited number of the modifications proposed are necessary to make the Plan sound. At the further request of the Inspector, we have further considered and delineated potentially "main" modifications from "additional" modifications to assist in the Inspector's work in undertaking the Examination in Public.

The Council has therefore split the proposed modifications included in the Regulation 22 statement into a draft list of proposed ("main") modifications that the Inspector may consider are required to be made for soundness, and "additional" proposed modifications, which we consider would be beneficial for the successful implementation of the Plan, including reduction of repetition of NPPF, London Plan, and other relevant regulations and guidance. For each of the "main" modifications, the schedule sets out why these are considered to be necessary for soundness, as per the Inspector's request.

Proposed Main Modifications

Policy LE5 – Tourism & Visitor Accommodation

Proposed main modification	Justification / Reason
<p>Amend Policy LE5, paragraph C as follows:</p> <p>c. Any change in use or redevelopment complies with other policy requirements of the development plan; <u>and</u></p> <p><u>d. There would be no net loss from the borough stocks over the plan period through re-provision on site or elsewhere within the borough.</u></p> <p>Amend paragraph 5.5.2 as follows:</p> <p>5.5.2 As an outer London borough, Harrow's tourism economy is still an integral part of the local and wider economy. A strong tourism economy provides opportunities for local residents through jobs and supports local businesses across the borough. The London Plan (2021) estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041 and also set out a requirement for Harrow to deliver 347 rooms. The Harrow Economic Needs Study (2024) noted the impact of the Coronavirus pandemic, and forecasts that 270 <u>additional</u> rooms to be provided within Harrow from 2023 – 2041. The Council will look to meet the demand as set out above <u>over the plan period</u> through supporting appropriate new and retaining existing hotel / tourist accommodation in appropriate locations <u>unless the loss of a hotel is to be or has been replaced elsewhere within the borough which maybe secured through a legal agreement.</u></p>	<p>Amendment made to provide a more strategic approach to meeting the targets for tourism accommodation as set out by the London Plan (2021), by enabling a re-provision elsewhere within the borough resulting in no overall net loss.</p> <p>To ensure that the plan is effective, by more closely aligning with the approach in the London Plan.</p>

Strategic Policy 6 – Social & Community Infrastructure

Proposed main modification	Justification / Reason
<p>Amend SP06 as follows:</p> <p>d. Resisting the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of</p>	<p>Modification acknowledges that not all development will be required to contribute to strategic infrastructure.</p>

Proposed main modification	Justification / Reason
<p>other existing facilities contributing to an overall improvement in local provision; and</p> <p>e. Requiring all development to contribute to the delivery of strategic infrastructure identified in the Infrastructure Delivery Plan; and</p> <p>f. e. Utilising the Community Infrastructure Levy (CIL) or any subsequent mechanisms to fund the maintenance and provision of infrastructure through legal agreements.</p>	To ensure that the policy is consistent with national policy and regulations.

Policy CI1 - Safeguarding and Securing Social Infrastructure

Proposed main modification	Justification / Reason
<p>Amend submitted Part C as follows:</p> <p>C. The Council seeks to retain and protect existing social infrastructure and community facilities from loss to alternative uses. Any proposals that result in loss of these uses will be resisted, unless proposals can adequately demonstrate that:</p> <p>a. There is no longer a need for the current use or an alternative social infrastructure or community use (as evidenced by 24 months of effective marketing); there is no projected future need, or the site is unsuitable for the current use and there is no need for any other suitable community use on the site; and or</p> <p>b. The loss of social infrastructure would not result in a shortfall in provision of that use; or Redevelopment would secure enhanced social infrastructure reprovion on-site</p> <p>e. A replacement facility is provided <u>off-site</u> that would better meet the specific needs of existing and future users in regard to quantity, quality and location; or</p> <p>d. Redevelopment would secure enhanced social infrastructure reprovion (on or off-site) ensuring continued delivery of social infrastructure and related services.</p> <p>Delete submitted Part D.</p>	<p>Modifications proposed to provide greater clarity for planning decisions.</p> <p>To ensure that the Plan is positively prepared.</p>

Proposed main modification	Justification / Reason
Amend Part A as follows: 'Proposals will be required to make contributions towards the provision of enhanced or new social infrastructure <u>where additional needs are generated. Facilities should be appropriately located to meet these needs, in locations where there are existing facilities capacity issues or a need is identified</u> , to support new development	<p>Modification proposed to provide greater clarity for planning decisions.</p> <p>To ensure that the policy is consistent with national policy.</p>

Strategic Policy 8 – Responding to the Climate & Nature Emergency

Proposed main modification	Justification / Reason
<p>Add to Policy SP08: <u>Groundwater and land quality</u> i. <u>Planning policies and decisions should ensure that:</u></p> <ol style="list-style-type: none"> <u>1. a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);</u> <u>2. after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</u> <u>3. adequate site investigation information, prepared by a competent person, is available to inform these assessments.</u> <p>Add Supporting Text: <u>8.0.10 Planning applications should be accompanied by a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated. NPPE paragraph 189c) defines a competent person (to prepare site investigation): “A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation”.</u></p>	<p>To ensure that the risk of development adversely impacting on ground conditions is explicitly covered in adequate detail within policy and to address the concerns raised by the Environment Agency.</p> <p>To ensure that the policy is consistent with national policy.</p>

Policy CN3 – Reducing Flood Risk

Proposed main modification	Justification / Reason
Add between CN3(B)(d) & (e): e. No increase in the built footprint of any existing development within Flood Zone 3b. f. No increase in the vulnerability classification of any existing development within Flood Zone 3b.	To ensure that the policy is explicitly in accordance with national flood risk policy. To ensure that the policy is consistent with national policy.

Policy CN4 – Sustainable Drainage

Proposed main modification	Justification / Reason
Amend Part H as follows: to read: ‘Proposals for major all development should ensure appropriate best practice is followed with respect to the control of water pollution to ensure groundwater resources are not negatively impacted . Where SuDS are proposed, these must prevent discharges to ground through land affected by contamination’	To ensure that the risk of development adversely impacting on ground conditions is explicitly covered in adequate detail within policy and to address the concerns raised by the Environment Agency. To ensure that the plan is effective, by being in accordance with Environment Agency guidance.

Site Allocations

To ensure that the plan is positively prepared and justified, reflecting the latest evidence on site capacities, the following modifications are proposed:

Site OA7: Update Capacity to 463/509 units

Site OA9: Update numbers to 955/ 1,051 units

Site OA10 Clarify that the number is 18/20 C3 units’ equivalent floorspace

Site OA14: Update to 638/702

Site O4: Update to 292/292 units

Site O14: Update to 25/28 C3 units’ equivalent floorspace

Site O18: Clarify 25/25 C3 units’ equivalent floorspace

Site O19: Update Capacity to 52/57 units

Category		Past completions	Pre-adoption	Years 1-5	Years 6 – 10	Years 11 – 15	Total
		(19/20 – 23/24)	(24/25 – 25/26)	(26/27 – 30/31)	(31/32 – 35/36)	(36/37 – 40/41)	
Surplus housing delivered between 19/20 – 20/21		454					454
Completions 21/22 – 23/24	Opportunity area	1,464					1,464
	Outside opportunity area	460					460
	Total	1,924					1,924
Under construction	Opportunity area		365	257	0		622
	Outside opportunity area		357	74	0		431
	Total		722	331	0		1,053
Permissions or legal agreements	Opportunity area		17	100	0		117
	Outside opportunity area		92	330	0		422
	Total		109	430	0		539
Non-conventional supply	Opportunity area		5	1	0		
	Outside opportunity area		58	-68	0		
	Total		63	-67	0		
Small sites				375	1,875	1,875	4,125
Allocations	Opportunity area		869	2,992 2,980	2,333 2,157	780 702	6,974 6,708
	Outside opportunity area			466 451	1,211 1,162	231 210	1,908 1,823

	Total		869	3,458 <u>3,431</u>	3,544 <u>3,319</u>	1,011 <u>912</u>	8,882 <u>8,531</u>
Total	Opportunity area	1,633	1,256	3,350 <u>3,338</u>	2,333 <u>2,157</u>	780 <u>702</u>	9,352 <u>9,086</u>
	Outside opportunity area	745	507	802 <u>787</u>	1,211 <u>1,162</u>	231 <u>210</u>	3,496 <u>3,411</u>
	Small sites	0	0	375	1,875	1,875	4,125
	Total	2,378	1,763	4,527 <u>4,500</u>	5,419 <u>5,194</u>	2,886 <u>2,787</u>	16,973 <u>16,621</u>

Proposed Additional (Minor) Modifications

Strategic Policy 1 – High Quality Growth

Amend Para. 2.0.10 - ...New growth requires infrastructure to support its potential impacts, such as highway transport improvements, school places, access to doctor surgeries.'

add to the end of the first sentence: '...provides necessary uses for Harrow residents and promotes the creation of healthy and sustainable places.'

Amend paragraph 2.0.7 as follows: 'Heritage assets contribute to Harrow's character across the borough and their significance needs to be considered as part of all development proposals (see Strategic Policy 02HE1 (Historic Environment)).'

Policy GR1 - Achieving a High Standard of Development

Amend paragraph GR1B(c) as follows: 'c. Providing high quality (hard & soft) landscaping, amenity space and play space to support the overall quality of a successful development. Proposals should seek to retain or enhance existing landscaping, biodiversity or other natural features of merit (including rivers and the riparian zone).'

Amend paragraph 2.1.3 as follows: 'New development where appropriate should address the National Model Design Code, National Design Guide and London Plan Optimising Site Capacity Guidance, to ensure development opportunities are optimised and address all relevant material planning considerations, including local context (such as the historic environment and protected views heritage etc).'

Policy GR2 - Inclusive Neighbourhoods

No proposed modifications.

Policy GR3 - Public Realm and Connecting Places

Replace Part F with the following: Accessible and inclusive adaptations of heritage assets will be supported if harm to their significance is avoided and minimised, as well as outweighed by the public benefit of the adaptation.

Policy GR4 – Building Heights

Amend the key on the map at the end of Policy GR4 Building Heights to as follows: '~~Maximum appropriate~~ Appropriate heights for tall buildings'

Amend GR4 (E) (b) as follows: 'The protection and preservation of ~~local heritage views~~ protected views, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and'

Amend Part GR4E as follows:

- a. Would be appropriate for both the application site and the wider context, especially where a proposal may impact areas of significantly lower density and height;
- b, would be of an exemplary design;

~~b c.~~ The protection and preservation of local heritage views, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and
~~e d.~~ Address matters in relation to the safety of occupiers and any mitigation required.

Policy GR4a - Basement Development

Amend Part B as follows: Basement proposals for ~~independent housing~~ self-contained homes will not be supported.

Add new Para 2.4.20: Proposals for new basements within an Archaeological Priority Area (APA) should be consulted on with the Greater London Archaeological Advisory Service (GLAAS) and where appropriate be accompanied by a desk-based assessment.

Renumber remaining paragraphs accordingly.

Policy GR5 – View Management

Amend Part G as follows: ‘Opportunities to create new local views and vistas should be ~~maximised~~ secured through the design and layout of new development.

Policy GR6 – Areas of Special Character

Amend Part C as follows: ‘Proposals that would ~~substantially harm~~ have an unacceptable impact upon an area of special character, or its setting, will be refused

Policy GR7 – External Lighting

Amend the second paragraph ‘A’ to ‘B’

Policy GR8 – Shopfronts & Forecourts

No proposed modifications.

Policy GR9 – Outdoor Advertising, digital displays and hoardings

No proposed modifications.

Policy GR10 – Infill & Backland Sites

Amend Part Ae as follows: ‘Appropriate levels of car parking is provided in line with Policy M2 ~~commensurate to the scale of development~~, with servicing and refuse collection adequately addressed.’

Policy GR11 – Planning Obligations

Amendment paragraph A as follows: ‘Relevant infrastructure may include matters (but not limited to) such as public transport, active travel, health, counter-terrorism and public realm improvements’.

Amend part of paragraph 2.11.4 as follows: ‘Where considered a requirement a S.106 obligation may be secured for ~~public transport~~ for improvements to infrastructure such as public transport services, ~~stations access or capacity~~, junctions/roads or

infrastructure to provide increased capacity or improved accessibility, or to contribute to ~~new an improved~~ public realm

...or to contribute to ~~new an improved~~ public realm.

Policy GR12 – Site Allocations

Amend references to flood zone (surface water) 3a to high/ medium/ low risk of surface water flooding as appropriate in the site allocations, as set out in the SFRA.

See individual Site Allocations.

Strategic Policy 2 - Harrow's Historic Environment

Amend SP02, Part Ae as follows:

Ensuring that new development within the locally ~~strategic protected~~ views (as set out within the policies map) ~~does not harm views the significance of heritage assets within those views, for example to St Mary's Church spire and on Harrow on the Hill Conservation Area and other identified assets.~~

Amend SP02, Part C as follows:

Support ~~the integrated management measures to heritage assets to mitigate and adapt to climate change, of the natural and historic environment where this conserves and enhances and nature where appropriate, where these are able to be undertaken sensitively, whilst not harming the significance of both and optimise co-benefits, especially for climate change. the heritage asset~~

Policy HE1 – Historic Environment

Add a new part (part c) to Part D as follows:

'Maximise all opportunities to secure the future of conservation areas particularly those on the 'heritage at risk' register'.

Insert new HE1, Part C as follows:

Proposals relating to heritage assets (either designated or non-designated) will be considered against the relevant provisions of the NPPF

Delete subheading:

~~Designated Heritage Assets~~

Update subheadings for each separate asset:

Conservation Areas and Local Areas of Special Character

Listed Buildings and Locally Listed Buildings

Scheduled Monuments and Non-Designated Archaeological Assets

Registered Parks and Gardens (including locally listed parks and gardens); and Locally Listed Parks and Gardens

Delete sub-heading Non-Designated Heritage Assets and paragraph J.

~~Non-Designated Heritage assets~~

~~J. The Council will consider the effects on the significance of a non-designated heritage asset. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be taken.~~

After paragraph 3.1.8 Delete subheading
~~Designated Heritage Assets~~

Amend the following supporting text subheadings
Development within Conservation Areas and Local Areas of Special Character
Listed Buildings and Locally Listed Buildings
~~Non-Designated Heritage Assets~~
Registered Parks and Gardens (~~Locally Listed Park and Gardens~~) and Locally Listed Parks and Gardens

Delete paragraph 3.1.13
~~Non-designated heritage assets are locally important assets which can range across a number of assets that include locally listed buildings, locally listed parks and gardens, archaeological priority areas and Local Areas of Special Character (LASC). By reason of the difference in listing, there is a differing level of protection afforded to these assets.~~

Relocate paragraph 3.1.14 to paragraph 3.1.11

Remove erroneous reference to a paragraph at end of paragraph 3.1.13
...particularly in respect of buildings on the heritage at risk register (~~see paragraph 3.25 below~~).

Renumber paragraphs from 3.1.11 to 3.1.22 (end of supporting text).

Policy HE2 – Enabling Development

No proposed modifications.

Strategic Policy 3 – Meeting Harrow’s Housing Needs

Amend Para 4.3.7 as below:

In addition, proposals will be required to consider any future local guidance that may be produced to increase the provision of well designed new homes on small sites, such as site specific design briefs, master plans and Design Codes in line with the London Plan Guidance (2023), ~~to support well designed new homes on small sites~~

Policy HO1: Dwelling size mix

No proposed modifications.

Policy HO2: Conversion and redevelopment of dwellings

Amend part 2i of this, as below

~~Make adequate provision for parking and~~ Ensure any car parking is provided in line with Policy M2 and provides safe access to and within the site and not lead to any material increase in substandard vehicular access’.

Policy HO3: Optimising the use of small housing sites

Amend part 3d as below:

Ensure ~~sufficient parking is provided on site~~ any car parking is provided in line with Policy M2 to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users’.

Policy HO4 - Genuinely Affordable Housing

No proposed modifications.

Policy HO5: Housing estate renewal and regeneration

Amend part 1k o , as below:

Compliance with parking standards set out in Policy M2 should apply ~~unless exceptional local circumstances are demonstrated~~

Policy HO6: Accommodation for older people

No proposed modifications.

Policy HO7: Supported and Sheltered Housing

No proposed modifications.

Policy HO8: Purpose-built student accommodation

No proposed modifications.

Policy HO9 - Large scale purpose built and conversions for shared living (LSPBSL)

No proposed modifications.

Policy HO10 - Housing with shared facilities (Houses in Multiple Occupation)

The text of Part 11 of the policy should be amended as follows:

~~Adequate provision is made for car parking and~~ Car parking is provided in line policy M2 and provides safe access to property and does not result in a harmful cumulative increase in impact on on-street parking (in compliance with policy M2 Parking) or the safety of other road users’.

Policy HO11 - Self-build and Custom build housing

No proposed modifications.

Policy HO12 – Gypsy & Traveller Provision

Amend part 3f of the Policy HO12 as follows:
Add to the end of Part 1: Any expansion will need to be well designed to protect, enhance the significance of nearby Watling Farm GII Listed building and its setting.

Strategic Policy 4 – Local Economy

No proposed modifications.

Strategic Policy 5 – Harrow & Wealdstone Opportunity Area

Amend Part De as follows: ‘Improve ~~the pedestrian walking~~ connectivity and ~~the walking~~ environment throughout the Metropolitan Centre’

Policy LE1 – Development Principals & Town Centre Hierarchy

No proposed modifications.

Policy LE2 – Night-Time & Evening Economy

Amend Part D as follows: ‘All new proposed night-time activities must seek to ensure all residents are able to participate in and travel safely to nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community’.

Amend numbering (Second E to be replaced with F)

Policy LE5 – Tourism & Visitor Accommodation

No proposed (main) modifications.

Strategic Policy 6 – Social & Community Infrastructure

No proposed (main) modifications.

Policy CI1 - Safeguarding and Securing Social Infrastructure

Amend Part Bd as follows: ‘Are provided in flexible and, adaptable ~~and all abilities accessible~~ buildings that are accessible to all, and, preferably co-located with other social infrastructure uses; and

Amend Part Be as follows: ~~Must~~ Seek to maximise wider community benefit through the utilisation of measures such as community use agreements.

Re-order policy so that Existing Social Infrastructure (heading and Parts C and D) appears first

Amend paragraph 6.1.6 as follows:

6.1.6 Any proposals involving the loss of a community use should be evidenced by 24 months of continuous effective marketing, at a reasonable market rate. Evidence should include various examples of online and local marketing through reputable agents. Where it can be demonstrated that healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the

requirements listed under Part C ~~and D~~ of the Policy will not apply. Redevelopment of any facilities and subsequent reprovision should improve the experience of existing uses or the facility and incorporate additional capacity to meet future demand.

Policy CI2 - Play and Informal Leisure

No proposed modifications.

Policy CI3 - Sport and Recreation

Amend Part E (a) of Policy CI3 as follows: Any loss of facilities would be replaced with by equivalent or better provision in terms of quantity and quality, in a suitable location in accordance with Policy CI1 (Safeguarding and securing social infrastructure); or

Policy CI4 - Digital and Communications Infrastructure

Amend Part Ab as follows: 'The siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant), and the appearance and character of the area; and'

Strategic Policy 7 – Green Infrastructure

Amend Part J of the policy as follows: 'Green spaces infrastructure, which itself may have heritage value, should support the historic environment through ~~their~~ its ability to enhance heritage assets and link to local history'.

Insert the following at the end of paragraph 7.0.2: 'All development should avoid putting pressure on vulnerable ecosystems and mitigate risk through careful planning of green infrastructure, in line with Paragraph 159 of the NPPF 2023. Proposals relating should take account of Natural England's Green Infrastructure Guidance.'

Policy GI1 - Green Belt and Metropolitan Open Land

Amend Para 7.1.1 as follows:

Harrow's Green Belt accounts for 21.6% of Harrow's land area, and benefits from a variety of uses that help to maintain its openness and character. As well as a number of farmland and woodland areas, uses of the Borough's Green Belt include sports grounds, public open space, nature reserves and burial space. The Green Belt's purpose is to provide a break between urban areas and rural areas. For the avoidance of doubt, this policy has been prepared to reflect the provisions of Green Belt policy contained in the NPPF (December 2023).

Amend Part E as follows: Proposals on allocated sites GB1 and GB2 will be required to demonstrate very special circumstances and on Green Belt or MOL land that may not be in accordance with the NPPF should be put forward in the context of a comprehensive, long term plan(s) for the site as a whole.

Policy GI2 - Open Space

Amend Part C as follows:

Existing open space, ~~sports pitches, recreational buildings, and playing fields~~ should not be built on unless:

- a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or
- b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or
- c. Proposals relating to the loss of sports and recreation facilities meet the criteria set out in part E of policy CI3 ~~The proposals will result in the loss of sports and recreation facilities (including pitches) and meet the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use; or~~
- d. The proposal is for a small ancillary use (maintenance shed, food & beverage, changing rooms) that would enhance the useability of the space and surrounds., or
- e. ~~The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.~~

Amend Part B as follows: ‘Major development proposals ~~must~~ should incorporate new publicly accessible open space in accordance with the standards set in The London Plan unless it can be clearly demonstrated that it is not feasible, in which case off site contributions will be required

Insert new paragraph after existing paragraph 7.2.3 as follows: Proposals for new development should, in the first instance, seek to provide open space on site. Alternative approaches to meeting needs will be considered as an exception, including circumstances where evidence demonstrates that the size of the site is not sufficient to deliver useable open spaces and the needs of residents can be better met through other means, such as appropriate off-site provision or improvements to the quality of nearby open spaces. The proposed approach should be considered at the pre-application stage. Where off site provision is found to be an appropriate solution, this should be within walking distance of the development site and its provision will be secured through a S106 planning obligations agreement.

Policy GI3 - Biodiversity

Amend wording as proposed, with part G referring to the 2021 Environment Act, as follows:

“G. All major and minor development proposals, unless exempt under the Environment Act 2021, must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain...”

Amend Part Gc as follows: ‘A minimum of one ~~biodiversity~~ wildlife enhancement per residential dwelling; and’

Policy GI4 - Urban Greening, Landscaping and Trees

Amend paragraph 7.4.5 by adding the following at the end of the paragraph: ‘or public transport facilities.’

Clarify that UGF can contribute to BNG with additional supporting text at paragraph 7.4.2

The London Plan sets an Urban Greening Factor (UGF) requirement for major developments. The UGF provides a target for the value of green cover that development is expected to provide. The Council will adhere to the recommended UGF factors for major residential and commercial development as set by the London Plan and acknowledges that additional green cover has the potential to contribute towards bio-diversity net gain requirements. Existing green cover retained on site as part of a development proposal will count towards the target UGF score.

Policy GI5 - Food Growing

No proposed modifications.

Strategic Policy 8 – Responding to the Climate & Nature Emergency

No proposed (main) modifications.

Policy CN1 – Sustainable Design & Retrofitting

No proposed modifications.

Policy CN2 – Energy Infrastructure

No proposed modifications.

Policy CN3 – Reducing Flood Risk

Amend paragraph 8.3.8 by adding the following text to the end of the paragraph: The London Surface Water Strategy seeks to increase London’s resilience to surface water flooding. The Strategy will facilitate collaboration across administrative boundaries and with multiple strategic partners, including securing funding for surface water management projects and maintenance more efficiently.

Amend paragraph 8.3.10 as follows: ‘Harrow will proactively work with the West London LPA and Strategic Flood Group and other partnerships to adopt a catchment based approach to flood alleviation, mitigating water pollution and improving water quality across the network of waterways and to the collection and use of developer contributions to fund mitigation measures.

Amend Part G as follows: Natural flood management methods should be employed as the preferred approach in new development proposals.

Policy CN4 – Sustainable Drainage

Add to the end of paragraph 8.4.12, the following: and The Environment Agency’s Approach to Groundwater Protection, particularly statements G1 and G9 to G13; The Susdrain website; and the Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations to Update these’.

Policy CN5 – Waterway Management

In Policy CN5, amend the first (E) to (a) and renumber a and b to b and c respectively.

Amend paragraph 8.5.3 by adding the following to the end: ‘In recognition of the important role waterways / blue infrastructure plays, the policy facilitates enhancements that could include reconnection of sites to waterways / corridors,

deculveting / daylighting / restoration schemes, securing floodplain compensation - and utilising plans for compensation that provide wetlands and biodiversity gain.'

Strategic Policy 9 – Managing Waste & the Circular Economy

No proposed modifications.

Policy CE1 – Reducing and managing waste

No proposed modifications.

Policy CE2 – Design to Support the Circular Economy

Delete Part B of Policy CE1: Reducing and Managing Waste and renumber C and D to B and C respectively.

Strategic Policy 10 – Transport & Movement

Amend Part E as follows: The Council will seek to encourage and enable people to choose active transport for day and night time travel by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this in line with the Mayor's Vision Zero objective

Amend paragraph 10.0.2 by adding the following at the end: Active travel refers to modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.

Policy M1 – Sustainable Transport

No proposed modifications.

Policy M2 - Parking

Delete paragraph B and move H up to replace the deleted B and add additional text at the start so that the complete new Part B reads as: 'Sites which serve wide catchments in Harrow may need to continue to provide public car parking. On sites with existing public car parking in the Metropolitan and District Centres, or at strategic public transport or leisure nodes, any loss should be managed, based on an agreed local public parking strategy. Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality in line with the Harrow Parking Strategy. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.

Amend Para 10.2.9 to read: 'Car free developments are those that make no general on or off-site provision for car parking other than that required to meet the needs of disabled persons. Where located in areas of high public transport accessibility levels (PTAL4-6) and access to services through sustainable transport modes, such schemes are an effective means of delivering a modal shift away from private car use. Public parking plays an important role in underpinning the vitality and vibrancy of local centres, enabling a choice of modes, representing the wide range of goods and

services visited within them. Public parking enables visitation from areas that are not well connected by public transport, and enable families to conveniently travel together, as well as facilitation g the collection of bulky goods. This extends to other strategic assets, including leisure facilities that serve a sub-regional catchment, and parking at transport nodes that underpin mixed-mode travel within north London, and actively reduce congestion. ~~New development must demonstrate that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking.~~ In Harrow, the Harrow & Wealdstone Opportunity Area and town, district and neighbourhood centres with a PTAL of 4-6 provide the most suitable locations for car-free development. They provide occupiers with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere.

Amend paragraph 10.2.11 as follows: Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport.'

Amend part E to read as follows: 'Proposals that create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted unless appropriate mitigation measures can be put in place.'

Policy M3 – Deliveries, Servicing & Construction

Add to end of paragraph A the following: 'including use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movements where appropriate.'

Amend paragraph 10.3.5 as follows: "...shared consolidation facilities for deliveries and servicing including micro consolidation hubs as a means of minimising..."

Site Allocations

Allocation OA1 – Queens House Car Park

~~Town Centre, while ensuring a satisfactory reprovision of car parking spaces.'~~

The allocated use '~~Reprovision of carpark spaces~~' should be deleted.

The requirement for '~~Car parking reprovision (public and private parking)~~' should be deleted.

In the development principles the following amendment should be made: 'Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking. ~~Re-provision of appropriate levels of car parking (both in~~

~~relation to supporting new development and wider public car parking provision to serve the town centre) must be demonstrated.'~~

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly along the south east of the site.

Safe access and egress routes should be directed to the north west of the site towards Kymberley Road where there is a lower risk of flooding. Development should be directed away from the southern eastern areas of the site where there is higher risk of surface water flooding.

Allocation OA2 – Harrow on the Hill Underground & Bus Station

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly along Station Approach.

Safe access and egress routes should be directed to the northwest of the northern site towards College Road and southwest of the southern site towards Lowlands Road where there is a lower risk of flooding. Development should be directed away from the northern area of the northern site and southeast area of the southern site where there is higher risk of surface water flooding.

... An enhanced transport hub must deliver greater accessibility (including step free access from the southern entrance of the train station) and ensure transportation capacity is met over the plan period in line with TfL's future requirements.

The bus station uses should be retained and enhanced and so we welcome references to this in the development considerations. However, we recommend amendments to the wording as shown:

The development requirement 'Improved bus station to provide for capacity over the plan period and proposed electrification of the bus fleet' should be amended to read Provision of an enhanced bus station to accommodate the future bus network; including capacity for forecast growth and the necessary infrastructure for the zero emission bus fleet.

Allocation OA3 – 15-29 College Road

No proposed modifications.

Allocation OA4 – Havelock Place

No proposed modifications.

Allocation OA5 – Station Rd East

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Allocation OA6 – Greenhill Way

The allocated use 'Car parking' should be deleted.

The requirement for 'Car parking provision to serve town centre / new development' should be deleted.

In the development principles the following amendment should be made: 'Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking. Car parking will continue to be required at a level that is supportive of both any new development and for the Harrow Metropolitan Town Centre. New development will have to demonstrate an appropriate level of car parking.'

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Allocation OA7 – Tesco Station Rd

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

In the requirements the following amendment should be made: 'Re-provide the existing supermarket with limited car parking in line with London Plan standards to avoid a site that is dominated by surface car parking and sufficient associated parking.'

In the development principles the following amendment should be made: 'Improve pedestrian access to the site, and pedestrian links between the site and Harrow town centre. including use of the car park for linked trips.'

Allocation OA8 – Former Royal Mail Sorting Office, Elmgrove Rd

No proposed modifications.

Allocation OA9 – Poet's Corner & Milton Rd

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Allocation OAI0 – Wealdstone Probation Office

Replace Flood zone (Surface Water) 3a with:

The site is at medium risk of surface water flooding, particularly along the south east of the site.

Development should be directed away from the south east of the site where there is higher risk of surface water flooding.

Allocation OAI1 – Car Park, Ellen Webb Drive

The requirement ‘~~Appropriate car parking provision~~’ should be deleted.

In the development principles the following amendment should be made : ‘Car free development except for disabled persons’ or operational parking requirements
Car parking on site must be provided to serve any new development with care taken...’

Change current use to vacant.

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly in the northwest of the site. The intersection of Ellen Webb Drive and Headstone Drive, is at high risk of surface water flooding.

Development should be directed away from the west side of the site where there is higher risk of surface water flooding.

Allocation OAI2 – Peel Rd

Additional Development Principle:

Development should contribute to protecting and enhancing the significance of the locally listed Byron Recreation Ground.

The allocated use ‘~~Car parking~~’ should be deleted.

The requirement ‘~~Reprovision of appropriate level of car parking~~’ should be deleted.

In the development principles the following amendment should be made: ‘Car free development except for disabled persons’ or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of district centre car parking. Car parking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Centre. New development will have to demonstrate an appropriate level of car parking.’

Allocation OAI3 – Travis Perkins Wealdstone

Additional Development Principal:

Development should contribute to protecting and enhancing the significance of the locally listed Byron Recreation Ground.

The Council will support site assembly of the properties noted within the allocation; ~~and give due consideration to a Compulsory Purchase Order where appropriate.~~

Allocation OAI4 – Byron Quarter

Replace ~~Flood zone (Surface Water) 3a~~ with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Additional Development Principal:

Development should contribute to protecting and enhancing the significance of the locally listed Byron Recreation Ground.

The allocated use ‘~~Car parking~~’ should be deleted.

The requirement ‘~~Car parking re-provision~~’ should be deleted.

In the development principles the following amendment should be made: ‘~~Sufficient~~
~~A limited amount of car parking re-provision should be made within new development~~
to service the Leisure Centre (if retained or re-provided on-site) and other leisure and community uses.’

Allocation OA15 – Iceland Wealdstone

Replace ~~Flood zone (Surface Water) 3a~~ with:

The site is at high risk of surface water flooding, particularly along the centre of the site. High Street, at the east of the site, is at high risk of surface water flooding.

Safe access and egress routes should be directed to the west of the site towards Wolseley Road where there is a lower risk of flooding. Development should be directed away from the central areas of the site where there is higher risk of surface water flooding.

Allocation OA16 – Kodak

Replace ~~Flood zone (Surface Water) 3a~~ with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Amend Indicative residential capacity to read:

Before Plan period (before 1/4/21) – 452 units
Pre-Adoption Period (1/4/21-1/4/26) – 1,514 units
2026-2031 5-Yr period – 1,690 units

Additional Development Principal:

Development should contribute to protecting and enhancing the significance of Headstone Manor.
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Allocation OA17 – Former Kodak Administration Offices

Amend the policies map / Atlas of Change to remove the site from Strategic Industrial Location (SIL) to Locally Significant Industrial Sites (LSIS).
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Amend Planning considerations in the Site allocation to refer to Locally Significant Industrial Site instead of Strategic Industrial Location

Amend Planning History as follows: <u>P/1154/24</u> <u>P/1152/24</u>
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Allocation GB1 – Royal National Orthopaedic Hospital

Replace Flood zone (Surface Water) 3a with:

<u>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.</u>
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Add a new Development principle as follows: <u>Planning application will need to be supported by an archaeological desk-based assessment.</u>

Allocation GB2 – Watling Farm

Replace Flood zone (Surface Water) 3a with:

<u>The site is at high risk of surface water flooding, particularly along the centre of the site. Watling Farm Close, at the centre of the site, is at high risk of surface water flooding.</u>

<u>Watling Farm Close is at high risk of surface water flooding and is the only direct route out of the Farm. A safe 'haven' should be provided to the southeast of the site, where flood risk is not predicted.</u>
--

Additional Development Principal:

<u>Development should contribute to protecting and enhancing the significance of the Locally The Grade II listed Watling Farm</u>

Allocation O1 – Waitrose, South Harrow

<u>An appropriate level of carparking in line with London Plan standards must be provided to continue to serve the Waitrose superstore and also for any residential development.'</u>

Amend 'Requirements' as follows:

<u>NHS floorspace (having regard to the identified need at the time and the delivery of NHS floorspace on other allocated sites)</u>
--

Replace Flood zone (Surface Water) 3a with:

<u>The site is at high risk of surface water flooding, particularly along the south east of the site. Development should be directed away from the southern area of the site where there is higher risk of surface water flooding.</u>
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Safe access and egress routes should be directed to the southeast corner of the site towards Northolt Road where there is a lower risk of flooding. Development should be directed away from the southern area of the site where there is higher risk of surface water flooding.

Allocation O2 – Roxeth Library & Clinic

No proposed modifications.

Allocation O3 – Northolt Rd Nursery & Car Park & R/o 27 Northolt Rd, South Harow

The requirement '~~Provision of appropriate level of car parking~~' should be deleted as shown. Residential development in this location should be car free and any car parking associated with a re-provided nursery should be limited to disabled persons' parking or for operational needs.

In the development principles the following should be deleted as shown because there should be no requirement in this location to retain, re-provide or relocate car parking '~~Development of the car-park should be accompanied by an assessment of parking need which demonstrates that an appropriate level of parking is being retained, re-provided on-site or relocated.~~'

Replace Flood zone (Surface Water) 3a with:

Both sites are at high risk of surface water flooding, particularly along the west of the sites. The Car Park is at greater risk than the Children Centre. Northolt Road, to the west of the both sites, is at high risk of surface water flooding. Car Park - Safe access and egress routes should be directed to the northeast of the site towards Brigade Close where there is a lower risk of flooding. Children Centre - Safe access and egress routes should be directed to the east of the site towards Grange Road where there is a lower risk of flooding. Development should be directed away from the northwest side of the both sites where there is higher risk of surface water flooding.

Additional Development Principal:

Development should contribute to protecting and enhancing the significance of the Locally listed British Legion Club.

Allocation O4 – Grange Farm

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Allocation O5 – Harrow School Estate & John Lyon School

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Allocation O6 – Brethren’s Meeting Hall, The Ridgeway

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly along the southwest boundary / west side of the site. Safe access and egress routes should be directed towards The Ridgeway where there is a lower risk of flooding and road access. Development should be directed away from the south corner of the site where there is higher risk of surface water flooding.

Allocation O7 – Rayners Lane Station Car Park

The site objective should be amended as follows: ‘Mixed-use development which improves access to Rayners Lane Station, ~~while retaining or re-provided a sufficient level of car parking.~~’

The allocated use ‘~~Car parking~~’ should be deleted as shown.

The requirement ‘~~Re-provision of an appropriate level [of] station car-parking for disabled persons to help meet need generated by commuters and in connection with major events at Wembley Stadium.~~’ should be amended as shown.

In the development principles the following should be deleted as shown because there should be no requirement in this location to re-provide car parking. ‘~~Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.~~’

‘Any planning application for the redevelopment of the site should be supported by evidence of car parking demand within the District Centre and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.’

~~Re-provision of an appropriate level of l-station car-parking to help meet need generated by commuters to support the vitality of the District Centre.~~

~~Provide step-free access to Rayners Lane Station~~ Contribute towards the provision of step -free access to Rayners Lane Station commensurate with the quantum of development

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Allocation O8 – Harrow West Conservative Association

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly along the west and north of the site. Safe access and egress routes should be directed to the south of the site towards Village Way where there is a lower risk of flooding. Development should be directed away from the north and west of the site where there is higher risk of surface water flooding.

Allocation O9 – Pinner Telephone Exchange

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly along the east of the site.

The site is at risk from fluvial flooding from Yeading Brook, especially on its eastern part.

Site access and egress routes will be directed to the west of the site towards Cannon Lane where there is a lower risk of fluvial flooding. Development should be directed away from the eastern areas of the site where there is higher risk of surface water flooding.

Allocation O10 – Harrow View Telephone Exchange

No proposed modifications.

Allocation O11 – North Harrow Methodist Church

Proposed Modification:

~~'An appropriate level of car-parking should be retained, reprovided on site or relocated as part of development in order to meet the need generated by development as well as for the broader town centre.'~~

Replace Flood zone (Surface Water) 3a with:

The site is at moderate risk of surface water flooding, particularly in the south area of the site.

Allocation O12 – Hatch End Telephone Exchange

~~'An appropriate level of car-parking should be retained, reprovided on site or relocated as part of development in order to meet the need generated by development as well as for the broader town centre.'~~

Allocation O13 – Harrow Arts Centre

No proposed modifications.

Allocation O14 – Vernon Lodge

New Requirement: A Travel Plan will be required to demonstrate how sustainable travel patterns for residents of the site can be achieved.

Replace ~~Flood zone (Surface Water) 3a~~ with:

The site is at high risk of surface water flooding, particularly around the west and north part of the existing building in the site.

Safe access and egress routes should be directed to the north of the site towards Mountside where there is a lower risk of flooding. Development should be directed away from the northern and western areas of the site where there is higher risk of surface water flooding.

Allocation O15 – Belmont Clinic

Replace ~~Flood zone (Surface Water) 3a~~ with:

The site is at medium risk of surface water flooding, particularly in the centre of the site.

Safe access and egress routes should be directed to the south west of the site towards Kenton Lane where there is a lower risk of flooding. Development should be directed away from the centre of the site where there is higher risk of surface water flooding.

Allocation O16 – Traveller's Rest

Replace ~~Flood zone (Surface Water) 3a~~ with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

Change the PTAL to 4-5.

Amend 'Site objective' as follows:

A mixed-use development that retains or re-provides a Public House ~~and Hotel~~ within the Kenton District Town Centre, with an enabling residential element.

Delete hotel from 'Leading land use'

Delete 'Re-provision of hotel use on site' from 'Requirements'.

Delete 'and hotel offer' from 'Development principles' (third paragraph).

At the end of the fifth paragraph, add the following: 'Any loss or tourism accommodation from the site will be assessed in accordance with Policy LE5 – Tourism & Visitor Accommodation.'

Allocation O17 – Kenton Rd Telephone Exchange

Replace ~~Flood zone (Surface Water) 3a~~ with:

The site is at risk from fluvial flooding from the Wealdstone Brook, especially in the western part of the site.

The site is at medium risk of surface water flooding, however there is a small portion at higher risk, along the northwest of the site. The areas outside the west of the site are at high risk.

Safe access and egress routes should be directed to the east of the site towards Kenton Road where there is a lower risk of flooding.

Development should be directed away from the north west of the site where there is higher risk of surface water flooding. Development should be directed away from the north west of the site where there is higher risk of surface water flooding.

Allocation O18 – Wolstenholme

Amend final Development Principal:

The design and layout of development on this site should contribute to protecting and enhancing the significance of ~~must be sensitive to the~~ setting of the adjoining conservation area and the Locally listed cemetery and grade II* listed Church of St John the Evangelist (church and ruin) which faces the site, and should ensure the protection of the adjoining boundary wall.

Allocation O19 – Marsh Lane Gas Holders

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly along the west of the site. Marsh Lane, at the west of the site, is at high risk of surface water flooding.

Safe access and egress routes should be directed to the northeast of the site towards Wychwood Avenue where there is a lower risk of flooding. Development should be directed away from the west side of the site where there is higher risk of surface water flooding.

Allocation O20 – Canons Park Station Car Park

Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking associated with the station ~~and the development itself.~~

Public car parking to support multi-modal travel.

The site is suitable for partial residential development with retention of an appropriate amount of station car parking to support multi-modal travel on the Jubilee line ~~help meet demand generated by commuters.~~ Any planning application for the redevelopment of the site should be supported by evidence of car parking demand

and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.

Public car parking to support multi-modal travel.

The site is suitable for partial residential development with retention of an appropriate amount of station car parking to support multi-modal travel on the Jubilee line ~~help meet demand generated by commuters.~~ Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.

Allocation O21 – Anmer Lodge

The site objective should be amended as shown: ‘Mixed-use development of this under-utilised town centre site which includes a supermarket as well as a suitable level of residential use, ~~while replacing car parking.~~’

The allocated use ‘~~Car parking~~’ should be deleted as shown.

In the requirements the following amendment should be made ‘~~Appropriate level of replacement~~ A limited amount of public car parking for the town centre.’

Replace Flood zone (Surface Water) 3a with:

The site is at high risk of surface water flooding, particularly along the southeast of the site.

Safe access and egress routes should be directed to the southwest of the site towards Rainsford Close and Coverdale Close where there is a lower risk of flooding. Development should be directed away from the southeast side of the site where there is higher risk of surface water flooding.

Allocation O22 – Stanmore Station Car Park

Replace Flood zone (Surface Water) 3a with:

Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.

The site is suitable for ~~partial~~ residential development with re-provision of an appropriate amount of ~~public~~ station car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of ~~public~~ car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.

Housing development which improves access to Stanmore Station while providing a sufficient level of ~~public~~ car parking

Update the site boundary

Update the site area to 3 Ha.

Supporting land use(s)

Public Car parking

Transport operations

Class E

The site is suitable for ~~partial~~ residential development with re-provision of an appropriate amount of public station car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of public car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.

Redevelopment of the site should enable ~~facilitate~~ step-free access to Stanmore Station, both from London Road and from the retained or replacement car-parking facility.