

Statement of Common Ground

between

The London Borough of Harrow

and

Transport for London (TfL)

**In relation to the preparation of the Local Plan for the London Borough
of Harrow 2021 - 2041**

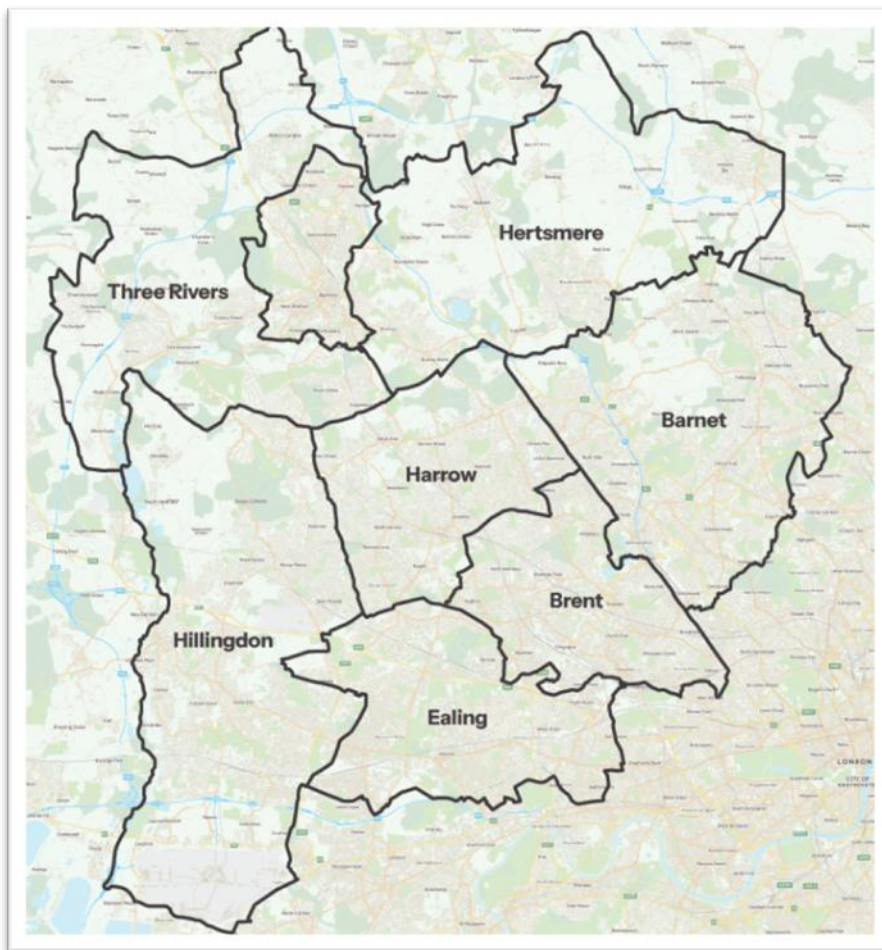
May 2025

1. Introduction

1.1 This Statement of Common Ground has been prepared by The London Borough of Harrow (“LBH”) and Transport for London (“TfL”) hereafter referred to as “the parties”. It sets out matters that are agreed between the parties in relation to Harrow’s New Local Plan 2021-2041 Proposed Submission (Regulation 19) version, November 2024 (the emerging Local Plan).

2. Borough Profile

2.1 LBH is an Outer London borough located in north west London. It borders four other London boroughs – Barnet to the east, Brent to the southeast, Ealing to the south and Hillingdon to the west and the Hertfordshire districts of Three Rivers and Hertsmere to the north. The map below shows Harrow and surrounding boroughs.



2.2 Covering a total area of 50.47 km², the borough of Harrow incorporates the Metropolitan Centre of Harrow, the Major Centre of Edgware (part) and the District Centres of Wealdstone, North Harrow, Pinner, Rayners Lane, South Harrow, Stanmore and parts of Burnt Oak, Kingsbury and Kenton. The Borough also contains a number of designated Local centres and Parades.

2.3 The borough has a resident population of approximately 261,200. Household sizes are significantly larger than the London average. 32.5% of households have 4 or more people compared to the London average of 24.1%. There are also a significantly lower proportion of one-person households (12.1%) than the London average (20.1%).

2.4 Housing density across the borough is relatively low. There are a significantly greater proportion of whole house or bungalow homes in the borough than the London average, which is reflective of a more suburban outer London Borough. There are significantly lower proportion of flats in the borough than the London average.

2.5 TfL's Public Transport Accessibility Level (PTAL) rating confirms that access to public transport is typical of outer London. Land surrounding and within identified District Centres generally has a PTAL rating of 3 and 4. The highest levels of access to public transport can be found in and around the Metropolitan Centre of Harrow, which has a PTAL rating of 6a.

2.6 Travel patterns across the borough are complex. Harrow is typical of other outer London Boroughs in that a proportion of journeys are undertaken to and from destinations outside of the London boundary, reflecting the functional linkages with other local authority areas. PTAL ratings provide a useful indicator of access to public transport services, but do not necessarily reflect the destinations that residents or daily commuters wish to travel to.

2.7 Harrow has higher rates of car ownership (75.2%) than the London average. Car and rail mode shares are both very similar to outer London averages and registration data for Harrow (DVLA) over the five years to 2023 shows a consistent annual decrease in the rate of car ownership.

3. The Emerging Local Plan

3.1 LBH commenced the evidence gathering process for its new Local Plan in 2018 and this has been on-going since this time. A document seeking views on the issues that the emerging Local Plan should cover was issued for consultation in February 2024. As part of this process, an open 'call for sites' exercise was also undertaken and the development of 'reasonable alternative' spatial options and policies prepared and analysed to enable preferred options to be identified.

3.2 Feedback from the earlier stages of the plan making process and the conclusions of all the completed evidence base documents were used to prepare the Regulation 19

version of the plan, which was published for comment on 4th November 2024 until 17th December 2024.

3.3 LBH submitted the Regulation 19 version of the plan for examination after full consideration of all representations received. The Local Plan is intended to be examined against the December 2023 NPPF, as enabled by the 2024 NPPF transitional arrangements.

4. The London Plan (March 2021)

4.1 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The current London Plan was adopted by the Mayor of London in March 2021.

4.2 All Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.

4.3 The London Plan should be read as a whole and the policies and priorities within the document have equal weight. Once adopted, policies in Harrow's Local Plan 2021-2041 and the London Plan will form part of the development plan for Harrow alongside made neighbourhood plans and the West London Waste Plan. LBH is required to determine planning applications for new development in accordance with policies in the development plan, unless material considerations indicate otherwise.

4.4 Chapter 10 of the London Plan focuses on Transport. Policy T6 (Parking) and policies T6.1 – T6.5 are of particular relevance to the representations made by TfL.

5. Key Strategic Matters

5.1 The parties have agreed the following strategic matters relating to the preparation of the emerging Local Plan:

General Conformity with the London Plan

5.2 The Mayor of London wrote to LBH on 16th December 2024, stating that:

'As currently drafted it is the Mayor's opinion that the draft Local Plan is in general conformity with the LP2021; although this letter provides some further guidance to bring the draft Plan into closer alignment with the LP2021.'

Transport and Parking Provision

5.3 The Mayor is supportive of the adoption of maximum car parking standards. Amendments to the wording of some policies is necessary to ensure the emerging Local Plan is fully consistent with LP2021 parking policies.

5.4 LBH received detailed comments on the emerging plan from TfL under a separate cover on 16th December 2024. The key points made by TfL were as follows:

- The emphasis placed on measures to encourage active travel and public transport and the promotion of car-free and car-lite development is supported, although this aspect could be strengthened further.
- The policies in the emerging Local Plan which encourage shifting journeys to sustainable modes and adopt the Healthy Streets Approach are supported.
- The explicit support for public transport and active travel improvements through planning contributions and the reference to active travel schemes which LBH is currently developing with TfL are supported.
- Concern at the large number of site allocations that require re-provision of car parking which is not in line with London Plan policy.
- In many cases, the requirement to retain parking spaces does not take into account the location or site PTAL and fails to make best use of land.

5.5 A schedule of the representations received from TfL on the emerging Local Plan, LBH's response and whether an agreed position has been reached can be found at Appendix 1.

6. Areas of Agreement

6.1 The main areas of agreement between LBH and TfL in relation to the preparation of the emerging Local Plan are set out below.

- The content of Harrow's emerging Local Plan is in general conformity with the London Plan.
- TfL is broadly supportive of the content, subject to the points highlighted in the Key Strategic Matters section of this statement and the Schedule of Comments at Appendix 1.
- Policy M2 of the emerging Local Plan is clear that development proposals will be supported where the number of vehicle parking spaces complies with the maximum London Plan standards.
- Policy T6 (B) of the London Plan states that the starting point for all development in areas which are well-connected is car-free with development in other areas being car-lite. The maximum parking standards in the London Plan relate to residential, office, retail, hotel and leisure uses and non-residential disabled persons parking standards.

- The emerging Local Plan includes allocations at Canons Park Station Car Park (Site O20) and Stanmore Station Car Park (Site O22) for residential use. LBH proposes that these allocations include the re-provision of station car parking.
- TfL's webCAT tool indicates that these sites have a predominant PTAL rating of 2-3.
- Paragraph 10.6.5 of the London Plan states that *'Where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity'*.
- Tables 1A and 1B in Appendix 1 detail the matters where agreement has been reached through discussion during the preparation of this Statement of Common Ground and the parts of the plan that are supported by TfL.

7. Outstanding matters

7.1 The areas where LBH and TfL remain in disagreement in relation to the preparation of the emerging Local Plan are set out below:

- TfL does not support the retention of car parking at Stanmore and Canons Park stations and considers that London Underground station car parks are sites suitable for development into other uses in order to make the best use of land and reduce car dominance.
- TfL maintains that the starting point for all developments which are well-connected, including on sites which are currently station car parks, is car-free.
- LBH's position is that the Stanmore and Canons Park allocations have a low public transport accessible level and the principle of re-providing some car parking on these sites is justified in the context of London Plan Policy T6.
- Some aspects of the wording to policy M2 are still to be agreed, although further proposed wording is put forward by LBH. Discussions on the wording of this policy will continue.

7.2 The respective positions of the parties on the outstanding matters are set out in Table 1C of Appendix 1. The parties agree to maintain an open dialogue to work through outstanding issues to the extent possible.

8. Governance Arrangements Including Future Review

8.1 The parties agree to:

- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies;
- To review and update this Statement of Common Ground in the light of any material change in circumstances; and
- To maintain positive principles of cooperation.

9. Signatories

9.1 We agree that this statement is an accurate representation of matters discussed and issues agreed upon.

9.2 It is agreed that these discussions have and will continue to inform the emerging Local Plan. The parties will continue to work together collaboratively, and the parties are satisfied that the requirements of the duty to cooperate have been met.

	On behalf of LBH	On behalf of TfL
Signed by		
Name	Viv Evans	Josephine Vos
Position	Chief Planning Officer	London Plan & Planning Obligations Manager
Date	30 th May 2025	30 th May 2025

Appendix 1 – TfL Responses to LB Harrow Reg 19 Consultation & Proposed Modifications

Table 1A: Matters where agreement has been reached through SoCG discussion

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
SP01: High Quality Growth	Para. 2.0.10 - We note the insertion of new paragraph 2.0.10. The first sentence should be amended as follows: 'New growth requires infrastructure to support its potential impacts, such as highway transport improvements, school places, access to doctor surgeries.'	Proposed Modifications: Amendments to paragraph. 2.0.10: ...New growth requires infrastructure to support its potential impacts, such as highway transport improvements, school places, access to doctor surgeries.'
GR4a: Basement Development	We note the introduction of this new policy. An additional condition needs to be added to part A ' <i>does not adversely impact on sub-surface transport or utilities infrastructure</i> ' The supporting text should include a requirement to consult with the owners or providers of sub-surface infrastructure to ensure that the proposed works do not have any adverse impacts either during construction or when completed.	This is a general requirement, not specific to basements and is covered by the provisions of other policies. No proposed modifications
GR4a: Basement Development	The requirement in part Ag to 'Continue to provide for appropriate landscaping and parking provision within the front garden' should be amended to remove reference to parking provision as shown.	Proposed Modifications: Replace part Ag of policy GR4a with the following wording:

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
		<u>‘Provide a front garden that is appropriate and reflects the character of the area.’</u>
GR10: Infill and backland sites, back gardens and amenity areas	Although we welcome the addition of a reference to Policy M2, the wording should be further amended as shown because car parking standards already reflect the scale of development. ‘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.	Proposed Modifications: Amendments to part Ae of the policy: ‘Appropriate levels of car parking are provided in line with Policy M2 commensurate to the scale of development , with servicing and refuse collection adequately addressed.’
GR11: Planning Obligations	Although we welcome the addition of a reference to public transport this should be included alongside affordable housing to ensure consistency with London Plan Policy DF1. It would also be helpful to add active travel improvements to the list of relevant infrastructure as shown below: ‘Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes <u>and necessary public transport improvements</u> , and to ensure that all relevant development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Relevant infrastructure may include matters (but not limited to) such as	Proposed Modifications: Amendments part A of the policy as follows: Relevant infrastructure may include matters (but not limited to) such as public transport, <u>active travel</u> health, counter-terrorism and public realm improvements’.

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	public transport, <u>active travel</u> , health, counter-terrorism and public realm improvements.	
GR11: Planning Obligations	<p>We welcome the addition of the following text to paragraph 2.11.4 although we recommend amendments as shown to ensure consistency with the London Plan and to provide greater clarity.</p> <p>‘Where considered a requirement a S.106 obligation may be secured for public transport for improvements to infrastructure such as transport bus services or bus infrastructure, stations access or capacity, junctions/roads or infrastructure to provide increased capacity or improved accessibility. or to contribute to new <u>an improved</u> public realm. Similarly, S.106 contributions towards walking and cycling infrastructure or the wider public realm may also be required from developments to meet the Mayor’s Healthy Streets Approach or to address deficiencies identified through an Active Travel Zone Assessment.’</p>	<p>Proposed Modifications:</p> <p>Amendment to part of paragraph 2.11.4:</p> <p>‘Where considered a requirement a S.106 obligation may be secured for public transport for transport improvements. This may include infrastructure such as improvements to public and active transport including stations as well as to junctions/roads. This could include obligations to mitigate impacts to ensure the ongoing function of the bus network.</p>
HO2: Conversion and replacement of dwellings	<p>The policy is inconsistent with London Plan Policy T6, as it should acknowledge there may be well connected locations where car parking may not be required. Suggest Policy should be amended as below to address this issue:</p> <p>‘Make adequate provision for parking and <u>Ensure any car parking is provided</u> in line with <u>Policy M2</u> and provides safe access to and</p>	<p>Proposed Modifications:</p> <p>Amendments to part 2iof the policy: Make adequate provision for parking and <u>Ensure any car parking is provided</u> 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’.</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	within the site and not lead to any material increase in substandard vehicular access’.	
HO3: Optimising the use of small housing sites	<p>The policy is inconsistent with London Plan Policy T6, as it should acknowledge there may be well connected locations where car parking may not be required. Suggest Policy should be amended as below to address this issue:</p> <p>‘Ensure sufficient parking is provided on-site <u>any car parking is provided in line with Policy M2</u> to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users’.</p>	<p>Proposed Modifications:</p> <p>Amendments to part 3d of the policy:</p> <p>Ensure sufficient parking is provided on-site <u>any car parking is provided in line with Policy M2</u> to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users’.</p>
HO5: Housing estate renewal and regeneration	<p>To ensure soundness and consistency with the London Plan and to avoid undermining the approach to car and cycle parking the wording in part 1K should be amended as follows:</p> <p>‘Compliance with parking standards set out in Policy M2 should apply unless exceptional local circumstances are demonstrated’.</p>	<p>Proposed Modifications:</p> <p>Amendments to part 1k of the policy:</p> <p>Compliance with parking standards set out in Policy M2 should apply unless exceptional local circumstances are demonstrated’</p>
HO10: Housing with shared facilities (Homes in Multiple Occupation)	<p>TfL reiterate previous comments, as no changes were made.</p> <p>‘Adequate provision is made for car parking and <u>It is car-free and provides</u> 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’.</p>	<p>Proposed Modifications:</p> <p>Amendments to part 11 of the policy: Adequate provision is made for car parking and <u>Proposed car parking should reflect the provisions of policy M2, to ensure safe access to property and no harmful cumulative increase in impact on</u> on-street parking (in compliance with policy M2 Parking) or the safety of other road users’.</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
		<p>Amend paragraph 4.10.7 to read as follows:</p> <p>In general accordance with the London Plan (2021), this policy seeks to facilitate HMO conversions, which intensify the use of existing premises, within the most appropriate locations that have good access to public transport, local; services and facilities (i.e. PTAL 4-6). <u>By reason of being directed to more sustainable locations, in most instances HMO developments should be car-free.</u> This in turn promotes the use of sustainable modes of transport, reduces the need to travel by private car. It also reduces the potential risks of harmful effects such as the need for higher levels of hard standing areas for car parking that can result in the loss of biodiversity/soft landscaping in front gardens and increased surface water runoff...</p>
SP05: Harrow and Wealdstone Opportunity Area	<p>We welcome changes to part De and part Df in line with our regulation 18 representation. However, in part De ‘the pedestrian’ should also have been deleted so that it reads as follows: ‘Improve the pedestrian walking connectivity and the walking environment throughout the Metropolitan Centre’.</p>	<p>Proposed Modifications:</p> <p>Amendments to part De of the policy:</p> <p>‘Improve the pedestrian walking connectivity and the walking environment throughout the Metropolitan Centre’</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>We welcome the change to the second sentence of para. 5.0.38 in line with our regulation 18 representation.</p> <p>We also welcome confirmation that ‘The Harrow Town Centre Masterplan will assist in setting out (among other things) how sustainable transport such as walking and cycling will be considered within the Harrow Town Centre and linking to the wider Harrow & Wealdstone Opportunity and beyond.’</p>	
LE2: Night Time and Evening Economy	<p>We note the addition of explanatory text in para. 5.2.3 ‘Whilst sustainable modes of transport, including walking and cycling are encouraged, nevertheless some nighttime activities may still rely on vehicles such as the private car and taxi / uber movements. Night-time activities should set out how servicing such as taxi / uber drop offs and pickups are able to be undertaken without harm to neighbouring properties or highway safety.’</p> <p>We welcome the addition of part D although we suggest a minor amendment to emphasise the need for safe night-time travel as follows: ‘All new proposed night-time activities must seek to ensure all residents are able to participate in <u>and travel safely to</u> nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community.’</p>	<p>Proposed Modifications:</p> <p>Amendments to part D of the policy: ‘All new proposed night-time activities must seek to ensure all residents are able to participate in <u>and travel safely to</u> nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community’.</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
GI4: Urban Greening, Landscape and Trees	We welcome insertion of the new paragraph supporting green infrastructure in kerbside space but suggest an addition as follows: ‘Kerbside space should be used for green infrastructure where it contributes positively to the public realm (in line with policy GR3) and is not required for active travel upgrades or <u>public transport facilities</u> .’	Proposed Modifications: Amend paragraph 7.4.5 by adding the following at the end of the paragraph: ‘ <u>or public transport facilities</u> .’
SP10: Movement	Part E - We support the addition to part E although we suggest a further amendment to address the point about day and night time travel as follows: ‘The Council will seek to encourage and enable people to choose active transport <u>for day and night time travel</u> by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this <u>in line with the Mayor’s Vision Zero objective</u> .’	Proposed Modifications: Amendments to part E of the policy: The Council will seek to encourage and enable people to choose active transport <u>for day and night time travel</u> by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this <u>in line with the Mayor’s Vision Zero objective</u> .
SP10: Movement	We note that no change has been made in line with our regulation 18 representation and so we reiterate our request for Strategic Policy 10 to include support for car free development in well-connected locations and delivering car-lite development elsewhere as one of the proposed measures to ensure consistency with London Plan Policy T6.	Proposed Modifications: Addition of new Part H to policy SP10: <u>The Council will support parking levels in line with the London Plan, including where appropriate car-free development in areas with good access to public transport.</u>
SP10: Movement	We also strongly encourage you to set out the proposed transport improvements which will support the delivery of the Local Plan, including	Proposed Modifications: Additional of final sentence to paragraph 10.0.5

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	a map of existing and proposed walking, cycling and public transport improvements.	<u>The Council will seek to set out spatially, through the Infrastructure Delivery Plan, transport improvements across the borough. This will include improvements to walking, cycling and public transport infrastructure.</u>
M1: Sustainable Transport	Although we welcome the strong focus on walking and cycling, there is very little about public transport in this policy or elsewhere in the local plan. We reiterate our regulation 18 representation that the local plan should set out requirements for safeguarding land for new transport projects as well as the protection and enhancement of existing transport infrastructure. In addition to active travel routes, this should include bus stations, stands, stops and driver facilities, bus garages, and rail and Underground stations and infrastructure. This is necessary for soundness and to ensure consistency with London Plan Policy T3.	No proposed modifications
M1: Sustainable Transport	We reiterate our regulation 18 representation about the need for a map of existing and proposed walking and cycling routes. The addition of paragraph 10.1.4 is helpful in setting out a number of active travel projects but in line with the Sustainable Transport, Walking and Cycling LPG these should be illustrated on a map of the existing networks that also identifies gaps in provision or areas for improvement. We	No proposed modifications

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	note that amended paragraph 2.11.4 refers to the funding of measures identified through an Active Travel Zone Assessment but a requirement for day and night-time Active Travel Zone Assessments should be included in Policy M1 to ensure soundness.	
M2: Parking	We note that paragraph 10.2.2 states that ‘Car free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6).’ This wording should be incorporated in the Policy to ensure consistency with London Plan Policy T6.	The London Plan’s parking standards are referenced in the Policy and will apply to new development proposals. No proposed modifications
M2: Parking	If any reference to ‘exceptional operational requirements’ is retained it needs to be defined in the glossary or supporting text based on the definition in London Plan Annex 3 which excludes parking for personal travel such as commuting.	This reference has been removed from the policy
M2: Parking	Para. 10.2.9 We recommend that this is redrafted as shown to better reflect the approach to parking in the London Plan ‘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. New	Proposed Modifications: Amendments to paragraph 10.2.9: ‘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. <u>New</u>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>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, <u>district and neighbourhood</u> 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.'</p>	<p>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, <u>district and neighbourhood</u> 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. <u>The rationalisation of public car parks will be managed in accordance with a local parking strategy.</u></p>
M2: Parking	<p>Para 10.2.11 We welcome the requirement for development to prioritise walking, cycling and public transport but this approach should not be confined to Opportunity Areas and town centres. It should apply to all areas of the borough and the wording amended as shown to reflect this. 'Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport.'</p>	<p>Proposed Modifications:</p> <p>Amendments to paragraph 10.2.11:</p> <p>Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport.'</p>
M3: Deliveries, Servicing and Construction	<p>We welcome inclusion of the sentence 'Development proposals which facilitate</p>	<p>Proposed Modifications:</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<u>sustainable freight movement by rail, waterways and road where appropriate, will be supported in line with Policy T7 of the London Plan.</u> However it would be useful to add ‘including use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movements where appropriate.’	Addition of the following text to end of paragraph A: ‘ <u>including use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movements where appropriate.</u> ’
M3: Deliveries, Servicing and Construction	Para. 10.3.1 – We note the additional reference to TfL Delivery and Servicing Plan guidance although this is more relevant to the section on Deliveries and Servicing than Construction Logistics.	Proposed Modifications: Move ‘TfL Delivery and Servicing Plan guidance should be followed’ from paragraph 10.3.1 to the end of 10.3.3.
M3: Deliveries, Servicing and Construction	Para. 10.3.5 – We welcome the addition of the following although we suggest a further amendment as shown ‘Consideration should also be given to the role of, and opportunities for, shared consolidation facilities for deliveries and servicing <u>including micro consolidation hubs</u> as a means of minimising vehicle movements, reducing overall levels of congestion and improving road safety.’	Proposed Modifications: Amendments to paragraph 10.3.5: “...shared consolidation facilities for deliveries and servicing <u>including micro consolidation hubs</u> as a means of minimising...”
OA1: Queen’s House Car Park	The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons’ or operational parking requirements, taking into account	Proposed Modifications: Amendments to Site allocation (Site objective): ...Harrow Metropolitan Town Centre, while ensuring a satisfactory reprovision of car parking spaces.

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>overall town centre parking supply. The requirement for re-provision of car parking is inappropriate in this location, would provide a constraint to improving the public realm and would fail to maximise use of a well-connected site within the town centre. Kymberley Road is also an important route for buses with stops and stands including for Superloop services and so any redevelopment of the site should take this into account. The following changes are necessary to ensure soundness and consistency with parking policies and standards in the London Plan.</p> <p>The site objective should be amended to remove reference to re-provision of car parking as follows: ‘Deliver a mixed-use development that provides high quality residential homes and appropriate town centre uses [in] the Harrow Metropolitan Town Centre, while ensuring a satisfactory re-provision of car parking spaces.’</p> <p>The allocated use ‘Reprovision of carpark spaces’ should be deleted.</p> <p>The requirement for ‘Car parking re-provision (public and private parking)’ should be deleted.</p>	<p>Amendments to Site allocation (Allocated use):</p> <p>‘Reprovision of carpark spaces’ should be deleted.</p> <p>Amendments to Development considerations (Requirements):</p> <p>The requirement for ‘Car parking re-provision (public and private parking)’ should be deleted.</p> <p>Amendments to Development considerations (Development principles):</p> <p><u>“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.”</u></p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>In the development principles the following amendment should be made: ‘<u>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.</u>’</p>	
<p>OA2: Harrow on the Hill Underground and Bus Stations</p>	<p>The sites are owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons’ or operational parking requirements, taking into account overall town centre parking supply.</p> <p>The site objective should be amended to refer to TfL’s future requirements as shown ‘Redevelopment of the site to provide a landmark / wayfinding development that will deliver housing, town centre uses and an</p>	<p>Proposed Modifications:</p> <p>Amendments to Site allocation (Site objective):</p> <p>... 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 <u>in line with TfL’s future requirements.</u></p> <p>Amendments to Development considerations (Requirements):</p> <p>‘Improved bus station to provide for capacity over the plan period and proposed electrification of the bus fleet’ should be</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>enhanced public transport hub. 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 <u>in line with TfL's future requirements</u>.'</p> <p>The bus station uses should be retained and enhanced and so we welcome references to this in the development considerations.</p> <p>However, we recommend amendments to the wording as shown:</p> <p>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 '<u>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.</u>'</p> <p>The development principle 'Redevelopment of the site must ensure a modernised bus station be delivered to ensure sufficient capacity over the plan period and includes the necessary infrastructure for the electrification of the network' should be amended to read '<u>Redevelopment of the site must ensure delivery of a modernised and enhanced bus station, which meets TfL's Passenger and</u></p>	<p>amended to read <u>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.</u></p> <p>Amendments to Development considerations (Development principles):</p> <p><u>Redevelopment of the site must ensure delivery of a modernised and enhanced bus station, which meets TfL's Passenger and Operational Requirements for the future bus network; including capacity for forecast growth and the necessary infrastructure to accommodate the zero emission bus fleet.'</u></p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p><u>Operational Requirements for the future bus network; including capacity for forecast growth and the necessary infrastructure to accommodate the zero emission bus fleet.</u></p> <p>In the development considerations we welcome the requirement ‘Provision of step free access to the southern side of the Harrow on the Hill underground station.’</p>	
OA6: Greenhill Way	<p>The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons’ or operational parking requirements, taking into account overall town centre parking supply. The requirement for re-provision of car parking is inappropriate in this location and would fail to maximise use of a well-connected site within the town centre. The following changes are necessary to ensure soundness and consistency with parking policies and standards in the London Plan.</p> <p>The allocated use ‘Car parking’ should be deleted.</p>	<p>Proposed Modifications:</p> <p>Amendments to Site allocation (Allocated use):</p> <p>The allocated use ‘Car parking’ should be deleted.</p> <p>Amendments to Development considerations (Requirements):</p> <p>The requirement for ‘Car parking provision to serve town centre / new development’ should be deleted.</p> <p>Amendments to Development considerations (Development principles):</p> <p>Car parking will continue to be required at a level that is supportive of both any new</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>The requirement for ‘Car parking provision to serve town centre / new development’ should be deleted.</p> <p>In the development principles the following amendment should be made: ‘<u>Car free development except for disabled persons</u>’ or <u>operational parking requirements</u>. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking Carparking 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 carparking.’</p>	<p>development and for the Harrow Metropolitan Town Centre. New development will have to demonstrate an appropriate level of carparking.</p> <p>Replace with the following:</p> <p>‘<u>Car free development except for disabled persons</u>’ or <u>operational parking requirements</u>. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking</p>
OA7: Tesco Station Road	<p>The site has a PTAL of 3 -4 with a very small area of PTAL 5 on the site frontage, is on the edge of Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so car parking should be minimised in line with London Plan standards.</p> <p>In the requirements the following amendment should be made: ‘Re-provide the existing supermarket <u>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.</u>’</p>	<p>Proposed Modifications:</p> <p>Amendments to Development considerations (requirements):</p> <p>‘Re-provide the existing supermarket <u>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.</u>’</p> <p>Amendments to Development considerations (Development principles):</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	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.'	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. '
OA11: Carpark Ellen Webb Drive	<p>The site has a PTAL of up to 6a and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development.</p> <p>The requirement 'Appropriate car parking provision' should be deleted.</p> <p>In the development principles the following amendment should be made : '<u>Car free development except for disabled persons</u>' or <u>operational parking requirements</u> Carparking on site must be provided to serve any new development with care taken...'</p>	<p>Proposed Modifications:</p> <p>Amendments to Development considerations (Requirements):</p> <p>'Appropriate car parking provision' should be deleted.</p> <p>Amendments to Development considerations (Development principles:</p> <p>'Car free development except for disabled persons' or operational parking requirements Carparking on site must be provided to serve any new development with care taken...'</p>
OA12: Peel Road	<p>The site has a PTAL of up to 6a and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development.</p> <p>The allocated use 'Car parking' should be deleted.</p> <p>The requirement 'Reprovision of appropriate level of car parking' should be deleted.</p>	<p>Proposed Modifications:</p> <p>Amendments to Site allocations (Allocated use):</p> <p>'Car parking' should be deleted.</p> <p>Amendments to Development considerations (Requirements):</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>In the development principles the following amendment should be made: <u>‘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. Carparking 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 carparking.’</u></p>	<p>‘Reprovision of appropriate level of car parking’ should be deleted.</p> <p>Amendments to Development considerations (Development principles):</p> <p><u>‘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. Carparking 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 carparking.’</u></p>
GB1: Royal National Orthopaedic Hospital (RNOH)	<p>The site has a PTAL of up to 1a and there are very limited opportunities for active travel. It is not well located for residential development or access to services and is likely to result in a car dependent development. If the site allocation includes housing as proposed this should be located close to existing bus services on Brockley Hill. The following development principle should be amended as shown ‘The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport <u>improvements including</u></p>	<p>Proposed Modifications:</p> <p>Amendments to Development considerations (Development principles):</p> <p>‘The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements <u>including active travel routes and access to public transport to improve connectivity</u> & support measures as set out in the Council’s Long Term Transport Strategy and Local Implementation Plan.’</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p><u>active travel routes and access to public transport to improve connectivity</u> & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan.'</p>	
O1: Waitrose South Harrow	<p>The site has a PTAL of 3 and is close to South Harrow bus and Underground stations and district centre so there should be a limited amount of car parking associated with any development.</p> <p>We note the requirement 'Appropriate level of replacement carparking'. Any car parking should be based on current London Plan standards and not historic provision.</p> <p>In the development principles the following amendment should be made to ensure consistency with the London Plan and to reflect the site's potential for a car free residential development taking account of the PTAL of 3 and the proximity to shops and services in South Harrow.' An appropriate level of car parking <u>in line with London Plan standards must be provided to continue</u> to serve the Waitrose superstore and also for any residential development.</p>	<p>Proposed Modifications:</p> <p>Amendments to Development considerations (Development principles):</p> <p>'An appropriate level of car parking <u>in line with London Plan standards must be provided to continue</u> to serve the Waitrose superstore and also for any residential development.</p>
O3: Northolt Road Nursery and Car Park at rear of 27 Northolt Road	<p>The sites have a PTAL of 4 and are close to South Harrow bus and Underground stations and district centre so there should be a limited</p>	<p>Proposed Modifications:</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>amount of car parking associated with any development.</p> <p>The requirement ‘Provision of appropriate level of car parking’ should be deleted as shown.</p> <p>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.</p> <p>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.’</p>	<p>Amendments to Development considerations (Requirements):</p> <p>Delete ‘Provision of appropriate level of car parking’</p> <p>Amendments to Development considerations (Development principles):</p> <p>Delete ‘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.’</p>
O7: Rayners Lane Station Car Park	<p>The site is owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 4 - 5 and is adjacent to Rayners Lane Underground station and district centre so any development should be car free to ensure consistency with the London Plan.</p> <p>The site objective should be amended as follows: ‘Mixed-use development which improves access to Rayners Lane Station, while</p>	<p>Proposed Modifications:</p> <p>Amendments to Site allocation (Site objective):</p> <p>‘Mixed-use development which improves access to Rayners Lane Station, while retaining or re-provided a sufficient level of car parking.’</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>retaining or re-provided a sufficient level of car parking.</p> <p>The allocated use 'Car parking' should be deleted as shown.</p> <p>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.</p> <p>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.'</p>	<p>The allocated use 'Car parking' should be deleted as shown</p> <p>.</p> <p>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.</p> <p>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.'</p>
O12: Hatch End Telephone Exchange	<p>The site has a PTAL of 2, forms part of Hatch End local centre and is close to Hatch End Overground station.</p> <p>The requirement for an appropriate provision of car parking should be deleted because car parking should be provided in line with Policy M2 and London Plan parking standards. There should be no need for additional car parking to serve the local centre which has a local</p>	<p>Proposed Modifications:</p> <p>Amendments to Development considerations (Development principles):</p> <p>'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.'</p>

Policy	TfL Representation at Reg 19 stage Dec 2024	LB Harrow Response May 2025
	<p>catchment that enables people to walk or cycle.</p> <p>In the development principles the following should be deleted as shown '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.'</p>	
O21: Anmer Lodge	<p>The site has a PTAL of 2 – 3 and is located within Stanmore District Centre. It provides an opportunity to replace car parking with more productive uses that enhance the district centre. 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.'</p> <p>The allocated use 'Car parking' should be deleted as shown.</p> <p>In the requirements the following amendment should be made 'Appropriate level of replacement A limited amount of public car parking for the town centre.'</p>	<p>Proposed Modifications:</p> <p>Amendments to Site allocation (Site objective):</p> <p>'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.'</p> <p>The allocated use 'Car parking' should be deleted as shown.</p> <p>In the requirements the following amendment should be made 'Appropriate level of replacement A limited amount of public car parking for the town centre.'</p>

Table 1B: TfL Representations submitted in support of the Regulation 19 Plan

Policy	TfL Representation	Harrow Response
GR3	We welcome the addition of paragraphs 2.3.18 – 2.3.23 which address safety issues including violence against women and girls.	Noted No proposed modifications
HO6	Support the amendment to part 3e of the policy ‘in line with Policy M2’, in in response with previous comments	Support noted. No proposed modifications
SP05	We welcome the addition of new sections that provide further details of commitments to address safety issues including violence against women and girls.	Noted. No proposed modifications
SP10	Although it is not included within the Policy, we welcome the addition to paragraph 10.0.3 which states that ‘The Council will work with TfL to identify additional targets for future iterations of the Mayor’s Transport Strategy.’ We also welcome the addition of paragraph 10.0.4 which includes reference to the Healthy Streets Data Park produced by TfL which shows that Harrow is on track to meet 2041 commitments. We would welcome further discussions to identify additional targets in advance of the next Mayor’s Transport Strategy.	Noted. No proposed modifications
SP10	Part A - We welcome the addition to part A so that it now reads: ‘Development proposals must facilitate improvements to transport infrastructure through active travel, and the public transport network to deliver safe, accessible, inclusive, healthy, walkable and sustainable neighbourhoods, <u>and mitigate their transport impacts through planning obligations.</u> ’	Noted. No proposed modifications

Policy	TfL Representation	Harrow Response
SP10	Part B - We welcome the addition to part B so that it now reads: 'Development must make effective use of land, improving its connectivity and accessibility to existing and future public transport, walking and cycling routes, <u>complying with London Plan parking standards to reduce the land take needed for carparking and mitigating any adverse impacts on London's transport networks and supporting infrastructure.</u> '	Noted. No proposed modifications
SP10	Part C - We welcome the additions to part C so that it now reads 'The Council will seek to improve access to public transport, <u>including the provision of fully accessible step-free station links</u> , particularly in areas of deprivation and for people with a disability, by working with Transport for London (TfL) to promote and improve public transport infrastructure, <u>capacity where needed to support development and all abilities access.</u>	Noted. No proposed modifications
M1	We note that the addition of 'mitigate their transport impacts through planning obligations' to Strategic Policy 10 part A partially addresses the point about transport contributions and that this is supported by the additional text added to paragraph 2.11.4 (see comments above).	Noted. No proposed modifications
M2	We welcome changes to a number of policies that clarify that 'Car parking will be provided in line with Policy M2' However further changes are needed to the wording of Policy M2 itself to ensure it is consistent with London Plan Policy T6 as set out below.	Noted. No proposed modifications
M2	We welcome changes to a number of policies that clarify that 'Car parking will be provided in line with Policy M2' However further changes are needed to the wording of Policy M2 itself to ensure it is consistent with London Plan Policy T6 as set out below.	Noted. No proposed modifications

Policy	TfL Representation	Harrow Response
M2	We welcome the amended wording so that it now reads: ‘The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose, Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists <u>in line with London Plan Policy T2 (Healthy Streets)</u>).	Noted. No proposed modifications
M2	Part E – We welcome deletion of the reference to inappropriate on-site parking so that it now reads: ‘Proposals that would result in inappropriate on-site parking provision, having regard to the supporting text in this policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.’	Noted. No proposed modifications
M2	Part G - We welcome amendments to part G so that it now reads: ‘Development in Town Centres should prioritise walking, cycling and public transport, including access to and from town centres. The public realm will be designed to support modal shift away from car use. Services and activities within the public realm will be supported. London Plan car parking maximums for office, retail and hotel accommodation must be complied with.’	Noted. No proposed modifications
M2	Para. 10.2.2 - We note that the amended wording ‘Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to both minimum and maximum parking standards as set by the London Plan, <u>except where a minimum provision would support additional family housing.</u> ’	Noted. No proposed modifications

Policy	TfL Representation	Harrow Response
M2	Para. 10.2.7 - We note the amended wording ‘On-site provision of vehicle parking can often overcome some issues with on-street parking particularly in residential areas where on-street parking can result in congestion and hindrance to traffic flow.’ This is an improvement on the previous wording.	Noted. No proposed modifications
M2	Para. 10.2.8 We welcome deletion of the final sentence as recommended in our regulation 18 representation.	Noted. No proposed modifications
M3	Part B – We note the amended wording ‘Demonstrating through the submission of a Construction Management/ Logistics Plan Statement (Major applications only), any impacts on the transport network during the construction phase of the development (including road closures and damage to the transport.’	Noted. No proposed modifications
M2	Part A - We welcome the change made to part A in line with our regulation 18 representation.	Noted. No proposed modifications

Table 1C: Outstanding matters

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
M2	Part H – We reiterate our regulation 18 representation that this part of the policy as currently drafted is not supported and should be amended to take account of London Plan standards, mode share targets, and the aim of encouraging active travel	The Council believe that it is important that any reduction in town centre car parking is managed strategically in order to protect the vibrancy of the town centre.	We have no objections to moving part H of the policy to the place of a deleted part B. We partly support the proposed modification insofar as a policy of car parking restraint must be applied across the borough with	Proposed Modifications: Further suggested wording to part B Sites which serve wide catchments in Harrow may need to continue to

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
	<p>and reducing car use for access to town centres and rail stations. Town centre car parking should be the minimum necessary to meet essential needs, such as provision for disabled persons or operational car parking requirements and must be clearly justified on a case-by-case basis. This part of the policy should also be more supportive of the redevelopment of car parking for more productive uses in line with London Plan Policies GG1 Making the best use of land, H1 Increasing housing supply (Part Bb), SD7 Town centres (Part C6a) and Section 6 of the Sustainable Transport, Walking and Cycling LPG. To ensure consistency with the approach to parking in the London Plan we recommend that it is redrafted as follows: <u>‘Proposals for the redevelopment of surplus, under-used or poorly located car parking for more productive uses are supported</u>. Any proposed reduction of car parking (either on-street or off-street) should consider the</p>	<p>We acknowledge that the London Plan standards for new uses on sites should be the starting point of any new parking for users of the site.</p> <p>Modification proposed to address this and representation in relation to Part B.</p> <p>Proposed Modifications:</p> <p>Move part H up to replace the deleted part B and add additional text at the start so that the complete new Part B reads as: ‘<u>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, car parking should be rationalised with the reduction managed through an agreed local public parking strategy. Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking</u></p>	<p>greater levels of restraint in places which are well-connected and have greater access to services and amenities.</p> <p>We do not support the proposed modification with regards to its setting an expectation that some sites will still need to provide car parking, not least based on their catchment – this is tenuous and unevidenced. Harrow town centre has a very large catchment by public transport. Other outer London boroughs also have large catchments for their Metropolitan town centres and fully comply with London Plan policy.</p> <p>While London Plan Policy T6 L requires that developments follow the approach set out in the current London Plan rather than re-providing car parking that is currently there, we understand that there can be a certain tension when all or nearly all public car parks are</p>	<p>provide public car parking. <i>On sites with existing public car parking in the Metropolitan and District Centres, or at strategic public transport or leisure nodes, car parking should be rationalised with the reduction managed through 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’.</i></p>

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
	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.'	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. See modification set out above for Part B.	<p>site allocations. However, the overriding principle that new development is provided on the basis of the current approach is in policy. Also, town centres are by their nature the most well-connected places in London as they are often centred around rail stations with the bus network focused in these locations as well as the fact that shops and services in these locations provide residents what they need locally. Further, in these constrained locations we need to make effective, efficient use of land. This is at the heart of a brownfield first approach. We do not agree that car parking is necessary for protecting town centre vibrancy and, as supported by evidence, car use is in fact detrimental to town centre vibrancy with more successful centres relying on access by foot, cycle or public transport.</p> <p>We are not opposed to taking a strategic approach to reducing car parking in town centres and</p>	<p>Delete Part H of the policy</p> <p>H. 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.</p>

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
			<p>appreciate that there is a period of transition for new travel habits to develop. However, for the avoidance of doubt, to align with the principles and policies set out in the London Plan, a 'local parking strategy' should effectively set out the managed reduction over time in public car parking as those sites come forward for development with a clear path to compliance within the plan period. Any such strategy should set a path for further restricting car parking over time across the town centre and the sites which are the most well-connected by sustainable modes should be the highest priority for being car-free with no reprovion of public car parking. Any reprovided car parking should be able to be converted to productive uses.</p>	
O20 Canons Park	The site is owned by TfL and so a separate response will be submitted by Places for London.	The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the	We strongly disagree that there are benefits for retaining car parking at rail and Underground stations in Greater London and	LBH 's position is that the Stanmore and Canons Park allocations have a low public transport

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
Station Car Park	<p>The site has a PTAL of 2 – 3 and is adjacent to Canons Park Underground station, Due to the proximity to the station it is suitable for a car free residential development. The site objective should be amended to read ‘Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking.</p> <p>The allocated use ‘Car parking’ should be deleted as shown.</p> <p>In the development principles the following amendment should be made: ‘The site is suitable for partial residential development with retention of an appropriate amount of station car parking <u>for disabled persons to help meet demand generated by commuters.</u> 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.’</p>	<p>catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL’s position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p>	<p>the statements made by the Council are inaccurate for several reasons which are set out below.</p> <p>Canons Park station has 162 car parking spaces. Assuming full occupancy of the car park for commuters on Tuesday-Thursday, no more than 5% of the approximately 7,500 journeys would involve a car park user and therefore car park users make up a negligible proportion of those using the station. Surveys of station car park users at other stations in London indicate that roughly 90% of station car park users either have a closer local station, a direct bus route to the station or live within walking distance or a short cycle. This means that people are choosing to drive to a non-local station during the peak period, therefore contributing to worse road congestion in Harrow, rather than using sustainable modes to access a station</p>	<p>accessibility level and the principle of reproviding some car parking on the site is considered to be justified in the context of London Plan Policy T6.</p>

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
		<p>Proposed Modifications:</p> <p>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.</p> <p><u>Public car parking to support multi-modal travel.</u></p> <p>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.</p>	<p>which are readily available or using a local station.</p> <p>Car parking does not contribute to the strategic function of a station; the strategic function of a station comes from being a point of access to a high quality, high capacity rail service and access to that service is better provided through active, efficient and sustainable modes. There is however clear policy support for the redevelopment of car parks, including at stations, as set out in London Plan policies SD7, H1 and H2, as well as Chapter 6 of the Sustainable Transport, Walking and Cycling LPG. Conversely, there is no policy support for park and ride facilities anywhere in the London Plan.</p> <p>During the appeal for the previous planning application, the Inspector stated, ‘The development of the car park would result in a reduction in commuter parking. This could</p>	

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			<p>encourage people to either walk, cycle or take the bus to the station or to use stations closer to their home. This would be helped by the provision of 71 spaces in a new station cycle hub for use by the general public. I give these benefits moderate weight.'</p> <p>Canons Park station is also located near a number of other tube stations being located approximately 1.5km from Stanmore, Queensbury and Edgware stations and 3.2km from Harrow & Wealdstone station, which in the latter case is a short, 13- minute journey by bus. Canons Park station itself benefits from three bus routes which serve the wider area.</p> <p>Given the above, the site is undoubtedly well-connected and therefore to be in line with London Plan policy T6, the starting point for development in this location is car-free. There would be negligible negative impacts and in order to shift</p>	

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
			journeys from car to active, efficient and sustainable modes and meet the Mayor's target set out in London Plan policy T1, there is a need for car parking restraint on this site. This is also necessary to support other policies in the London Plan including Policy GG2 Making the best use of land.	
O22 Stanmore Station Carpark	<p>The site is owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 2 – 3 and is located adjacent to Stanmore Underground station. Due to the proximity to the station it is suitable for a car free residential development. The site objective should be amended to read 'Housing development which improves access to Stanmore Station, while providing a sufficient level of car parking.'</p> <p>The allocated use 'Car parking' should be deleted as shown.</p> <p>In the requirements the following should be deleted 'Reprovision of suitable level of car parking for</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL's position that new development at</p>	<p>As with Canons Park station, we strongly disagree that there are benefits for retaining car parking at rail and Underground stations in Greater London and the statements made by the Council are inaccurate for several reasons which are set out below.</p> <p>Stanmore station currently has 434 car parking spaces. Surveys done in 2019 indicate that 65 per cent of station car park users live more than 5km from the station, which given the location of Stanmore station and the geography of Harrow would indicate that everyone in this group lives outside Harrow, and almost certainly live outside</p>	<p>The LPA's position is that the Stanmore and Canons Park allocations have a low public transport accessibility level and the principle of reproviding some car parking on the site is considered to be justified in the context of London Plan Policy T6.</p>

Policy	TfL comments at Reg. 19 stage Dec 2024	LB Harrow response February 2025	TfL response February 2025	LB Harrow response May 2025
	<p>commuters and in connection with major events at Wembley Stadium.</p> <p>In the development principles the following amendments should be made 'The site is suitable for <u>partial</u> residential development with re-provision of an appropriate amount of station car parking <u>for disabled persons</u>. 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 car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.'</p>	<p>high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modifications:</p> <p>The site is suitable for <u>partial</u> residential development with re-provision of an appropriate amount of <u>public</u> 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 <u>public</u> car parking demand and show how that demand will be met by the re-</p>	<p>Greater London. Of station car park users, 48 per cent live more than 5km from the station and also travel past another rail or London Underground station. While only 35 per cent of car park users live less than 5km from the station, 52 per cent indicated that they would be willing to cycle all or part of their journey if facilities were improved. This means that people are choosing to drive to a non-local station during the peak period, therefore contributing to worse road congestion in Harrow, rather than using sustainable modes to access a station which are readily available or using a local station.</p> <p>As stated above, car parking does not contribute to the strategic function of a station; the strategic function of a station comes from being a point of access to a high quality, high capacity rail service and access to that service is better provided through active,</p>	

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		<p>provision of car parking capacity on the site or elsewhere.</p> <p>Housing development which improves access to Stanmore Station while providing a sufficient level of <u>public</u> car parking</p>	<p>efficient and sustainable modes. It is the actual strategic function of the station that makes it even more important to make best use of land around the station. There is additionally clear policy support for the redevelopment of car parks, including at stations, as set out in London Plan policies SD7, H1 and H2, as well as Chapter 6 of the Sustainable Transport, Walking and Cycling LPG. Conversely, there is no policy support for park and ride facilities anywhere in the London Plan. While as modified, the draft plan identifies the site for residential development as opposed to partial residential development, we do not believe that re-provided station car parking amounts to optimising site capacity as set out by London Plan Policy D3.</p> <p>Stanmore station, like Canons Park station, is located within a relatively dense network of suburban London Underground and rail stations and has direct</p>	

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			<p>access to three bus routes which operate every 10-15 minutes and provide access to the station from locations such as Hatch End (Lioness line), Edgware (Northern line) and Watford (West Coast Main Line).</p> <p>We note concerns around impacts of parking on Wembley Stadium event days, however this is an issue of enforcement. London Plan Policy T6C states that ‘an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.’ Therefore, a requirement to continue providing car parking at Stanmore station due to what amounts to inadequate on-street parking controls would not align with London Plan policy.</p>	

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			<p>Given the above, the site is undoubtedly well-connected and therefore to be in line with London Plan policy T6, the starting point for development in this location is car-free. There would be negligible negative impacts and in order to shift journeys from car to active, efficient and sustainable modes and meet the Mayor's target set out in London Plan policy T1, there is a need for car parking restraint on this site. This is also necessary to support a range of other policies in the London Plan including Policy GG2 Making the best use of land and Policy D3 Optimising site capacity through a design-led approach.</p>	