



# **EXAMINATION OF THE HARROW LOCAL PLAN 2021-2041**

## **HEARING STATEMENT**

### **MATTER 9: TRANSPORT AND MOVEMENT**

#### **ISSUE 15**

**5 June 2025**

## **Matter 9 Transport and Movement**

*Issue 15: Whether the approach to transport and movement is justified, positively prepared, consistent with national policy and in general conformity with the London Plan*

### **Questions**

#### **Strategic Policy 10: Movement**

**15.1 This policy identifies, amongst other things, that public and active transport travel networks will be enhanced to become more attractive alternative to private vehicles. In what way will the Plan achieve this objective, and which non-strategic policies will achieve this objective? Is the Plan and its policies sufficiently effective in this regard?**

- 15.1.1 Policies SP10 and M1, M2, and M3 will deliver this objective. Between them they support a range of development outcomes which will deliver:
- Improved pedestrian environments including improved pedestrian crossings, junctions, routes around the highway network;
  - By optimising the legibility of the urban environment to make it as easy as possible for pedestrians to navigate and use local facilities;
  - Improved cycling & pedestrian connections through the delivery of new connections through development sites;
  - More and better cycle parking and facilities, including for charging and post-ride facilities, (including the strategic items in the response to question 15.5 below);
  - Reduced (per capita) trips by private car by managing and mitigating the negative impacts on the transport network through Travel Plans;
  - Controlling parking levels in new development; and
  - Supporting sustainable freight and delivery movements and patterns.

**15.2 Is Strategic Policy 10 as drafted positively prepared and effective? As drafted, are parts A, B and E clearly written and unambiguous? Is it clear how a decision maker should react to development proposals?**

- 15.2.1 The policy is clear, and effective. It provides appropriate policy hooks enabling decision makers to:
- Deliver improved pedestrian and cycle connections;
  - Apply the London Plan's Healthy Streets approach;
  - Protect existing pedestrian and cycling assets;
  - Deliver new routes through development sites;
  - Apply the London Cycle Design Standards;

- Deliver cycle parking & pre/post ride infrastructure;
- Require development contributions where appropriate.

**15.3 Is it a justified approach for part A of the policy to require all development proposals to facilitate improvements to transport infrastructure and how would this be applied to householder planning applications? Should this part of the policy apply to major development proposals only?**

15.3.1 It is appropriate that Part A of the policy applies to sites other than major developments. The Council recognise that it is unlikely that householder applications in particular would be expected to make significant benefits but applying it only to major development would exclude all schemes of 1-9 units from this consideration. It is appropriate that the ability of minor as well as major development sites to benefit sustainable transport is considered.

**15.4 The transport strategic objective (page 23 of the Plan) notes that sustainable transport infrastructure will be delivered to ensure there are healthy and safe alternatives to the private vehicles, and the Council will facilitate modal shift away from fossil fuel car use. Which policies will secure these objectives and in what way?**

15.4.1 Policies SP10 & M1 focus on securing positive pedestrian and cycling environments, and improved public transport connections. Policy M1 sets a range of requirements for new development that will improve sustainable travel opportunities. Policy M1B restricts and mitigates the negative impacts of transport arising from new development. Policy M2 manages parking levels and design in new developments (including applying the London Plan's maximum parking standards and prioritising sustainable transport options in order to facilitate modal shift away from private vehicles). Policy M3 promotes a sustainable management of freight and delivery movements on the local network.

**15.5 If the Council is facilitating a modal shift away from fossil fuel car use, what does this mean for parking provision in relation to electric cars? How does the Plan seek to address these parking requirements?**

15.5.1 The move away from internal combustion engines in the plan is two-fold. Firstly, there is an overall managing down of parking provision within new developments, while also supporting design that supports local residents to make journeys by active or public transport modes. This will, over time, produce a shift away from the private car, and therefore internal combustion engine use.

15.5.2 Secondly, the plan supports the operation of electric cars. Paragraph 10.2.3 refers back to the London Plan Policy T6 with regards to the requirement for electric charging infrastructure. Policy T6 requires that at least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces, i.e. future proofing an increased proportion of vehicles being electric.

**Policy M1: Sustainable Transport**

**15.6 With reference to the representations from Transport for London (TfL) could the Council identify on an annotated map the existing and proposed walking, cycling and public transport improvements referred to at part B of policy M1 and paragraph 10.1.4 of the supporting text.**

15.6.1 Please see Appendix 1.

**15.7 Is part A of the policy justified and is it consistent with the London Plan? Is this part of the policy sufficiently clear and what do the Council mean by a sustainable neighbourhood? Should this be defined within the glossary?**

15.7.1 Part A of the Policy is considered to be consistent with the London Plan.

15.7.2 The Council is not seeking to redefine “sustainable” and/or “neighbourhood” within this Plan. “Sustainable development” is broadly set out in Para 8 of the Framework, and the provisions in this policy support the delivery of actions within Harrow’s local neighbourhoods. These include:

- Good walking and cycling infrastructure;
- Good connections by active and private modes to key local nodes;
- The application of the London Plan Healthy Streets approach;
- Protection and improvement of routes to and through new developments;
- Enhanced access to cycle hire and similar facilities that improve active travel choice.

**15.8 Is part C of the policy sufficiently clear and justified and is it consistent with the London Plan?**

15.8.1 This provision supports the protection of existing walking and cycling assets, as well as promoting new assets through the redevelopment of sites. The principal of maximising active travel through development is considered to be a positive approach, and in conformity with the London Plan’s transport policies.

**15.9 Transport for London (TfL) have concerns that the Plan should be more specific concerning the safeguarding of land for new transport projects to ensure the plan is consistent with policy T3 of the London Plan. Are these changes necessary to ensure the policy is effective?**

15.9.1 Part (c) of the policy aims to protect existing infrastructure, and plan for improvements where they are deliverable on development sites. TfL have not provided specific safeguarding opportunities to be specifically protected through the Plan.

15.9.2 The Council has agreed with TfL through the agreement of a Statement of Common Ground (LBH/ED14) a potential modification in regards this policy: “Additional of final sentence to paragraph 10.0.5: 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.”

**15.10 In what way does policy M1 support development that will improve access to public transport?**

15.10.1 The policy focuses on improving multimodal infrastructure, i.e. through improving cycle parking at stations, which will support increased patronage on public transport.

15.10.2 By improving routes around and through sites, improved permeability/ connectivity will be achieved, and therefore access to public transport. Part A(a) of the Policy specifically seeks to improve connections to transport hubs.

**Policy M2 Parking**

*I note a significant number of representations made at the Regulation 19 stage of the Plan refer to consultation regarding changes to a Controlled Parking Zone. This does not form part of this Plan and as a result, the questions below focus on the representations made in relation to the policy as currently drafted.*

**15.11 Should the text at paragraph 10.2.2 be incorporated within the policy for effectiveness?**

- 15.11.1 Paragraph 10.2.2 is supporting text explaining what the London Plan standard set out in M2(A)(a) are. The LPA considers that it is not appropriate that this is in the Policy itself as it would unnecessary duplicate London Plan policy.

**15.12 Are parts B and H of the policy as drafted effective?**

- 15.12.1 M2 (B) is proposed to be deleted and (H) moved to (B) and reworded in the proposed modifications covered by the Statement of Common Ground with TFL.
- 15.12.2 As noted at various points in the evidence base, Harrow as an outer London borough has a higher level of car ownership that is typical across London. Partially as a consequence of this, parking availability at key infrastructure and town centres is an important local issue.
- 15.12.3 The Council is content to adopt the London Plan's parking standards, with the aim of reducing car use in favour of walking, cycling and public transport. The Council accepts that car trips should be managed though an overall reduction of town centre parking, but this also needs to be managed to ensure town centre vitality.
- 15.12.4 The Framework includes wording that development should help to improve the quality of parking in town centres alongside managing the overall level of parking. The current town centre car parking offer in Harrow's town centres is large, but not of a high standard. The London Plan policy T6.3 sets a maximum parking standard of 1 space per 75m<sup>2</sup> for the Opportunity Area, and 1 space per 50m<sup>2</sup> for other centres in the borough. The approach in the Local Plan seeks to manage the risks that an overly significant loss of parking would have on the vitality of local town centres.
- 15.12.5 It is appropriate that developments in the Metropolitan Town Centre and Local centres have regard to the London Plan standards when considering redevelopment of town centre car parks to ensure that an appropriate supply of parking spaces is retained/ replaced.

**Appendix 1 - Existing and proposed walking, cycling and public transport improvements**

See separate document.