

Harrow Local Plan Examination in Public

Transport for London (Spatial Planning) – Matter 6 Written Statement

Sites OA2, OA5, OA6, OA9, OAI1, OAI2, OAI4, OAI5, OI, O3, O6, O7, OI3, O20, O2I and OA2

OA2 Harrow on the Hill Underground & Bus station

12.17) The policy in relation to the above sites specifies that any new development will have to bring forward an appropriate level of parking – but how has this been factored into the capacity work undertaken? Is the policy sufficiently clear in this regard?

1. As set out in Part A of Policy M2, development proposals must comply with London Plan car parking standards. The London Plan requires that all development in PTAL 5+ and Metropolitan town centres is car free and developments which are well-connected must be car free. The site is PTAL 6A and benefits from frequent Metropolitan line services, including fast services, to central London, Chiltern Railway services and a bus station.
2. No car parking is proposed in the site allocation, which is welcomed. The site allocation could be made clearer that the multi-storey car park will not be re-provided, in line with London Plan car parking standards, London Plan policies T6.3 and T6 L and Policy M2 A of the draft Plan. Car parking provision, therefore should not impact on capacity work on this site (apart from any requirements for disabled persons parking).

12.18) How many car parking spaces will be lost as a result of the site allocation?

3. The Harrow on the Hill surface car park has 88 bays, including 4 disabled bays, 1 motorcycle bay and 1 electric vehicle charging point. The multi-storey car park provides approximately 90 parking spaces, of which, 42 spaces are dedicated for TfL / LUL operational / staff parking, with the remainder are leased to a financial business and available to permit holders only. The Council has correctly identified the site as having the potential for housing as set out in Part 6 (a) of London Plan Policy SD7 which identifies car parks, particularly in town centres, as an appropriate source of housing capacity. The redevelopment of the car park will also contribute to meeting London Plan policies T1 and GG2. Therefore, the loss of car parking on the site is supported. It would be counter to London Plan policy to re-provide car parking on the site, except for operational and disabled persons parking.

Q12.19 A number of the sites which the Council are identifying as site allocations are existing car parks, some of which are connected to public transport nodes. I also note that a number of station car parks are included and from an initial view as well as those expressed by the Regulation 19 representations, many appear to be well used facilities. I also note⁴ that Harrow has a significantly higher rate of car ownership (75.2%) compared to the London average (57.9%) reflecting the significantly higher rates of car use and distance travelled to get to work compared with the London average.

Please could the Council advise on the following:

- *Total number of car parking spaces to be lost through the plan period;*
- *Have the Council completed any surveys of existing use and capacity of the existing car park(s)? Are the results of these surveys available?*
- *Have the Council considered any implications of the removal of the car park for the allocated centre/transport node (where relevant)*
- *Where no replacement car parking is proposed at station car parks, for example allocation 07 Raynes Lane station car park, what are the implications for this strategy in terms of existing parking at the site and the existing users of the car park?*
- *In what way will the Council ensure that policy M2 (H) is addressed as part of any development proposals and should the site allocations (where applicable) include a cross reference to this policy for effectiveness?*

4. Although the above questions are directed at the Council, we hope that our answers below help clarify our position with respect to the questions and this site allocation.

5. National and regional land use and transport policy are clear that development plans need to support making the best use of land; sites such as this are appropriate for redevelopment to deliver housing and encourage modal shift away from cars.

- a. The NPPF sets out in para. 125 that significant weight should be given to the redevelopment of brownfield land within settlements for the purpose of housing and that policies should support the redevelopment of under-utilised land such as ‘car parks, lock-ups and railway infrastructure’.
- b. The London Plan, as stated above, requires development plans and proposals to make best use of land through a range of approaches, with an emphasis on town centre and edge-of-centre sites as well as those which are well-connected by public transport (London Plan Policy GG2). Part 2 of London Plan Policy HI additionally supports the

use of car parks as a source of housing land, as well as sites which are PTAL 3-6 and/or within 800m of a station or town centre boundary. London Plan Policy SD7 (6)(a) also identifies surface car parks as being suitable for comprehensive redevelopment. The planning balance would indicate that on this site, the redevelopment of a multi-storey car park is also appropriate for comprehensive redevelopment. Policy TI requires that development plans and proposals support the Mayor's target for 80 per cent of all journeys to be made by sustainable modes. Policy T6 requires that all development proposals which are or could be made well-connected by public transport be car-free and Policy T6 L requires that where sites are redeveloped, the current approach is taken, and existing car parking not be re-provided where it exceeds the standards set out in the Plan.

6. Furthermore, it is important to note that car ownership in Harrow has steadily decreased over the past six years, as in the rest of London (see figure I). While there are other socioeconomic factors which contribute to car ownership, we believe this demonstrates the effectiveness of the policy approach taken in the London Plan as well as the importance of it being applied consistently across Greater London. This approach is now reflected in national policy, with a decisive move away from 'predict and provide' to a vision-led approach as set out in paragraphs I09 and I15(d) of the NPPF.
7. As London and Harrow continue to grow—requiring more people and goods to move on the road network—it is essential to ensure that the finite land and road space available are used as efficiently as possible. Otherwise, there will be unacceptably adverse impacts on both the economy (through increasing the costs arising from congestion) and the provision of public transport (i.e. delays to buses). The Mayor's vision to achieve this efficiency is set out clearly in his Transport Strategy and includes measures such as car parking restraint. This was accepted by the inspectors at the London Plan examination in 2019 and ensuring local plan conformity with the London Plan forms part of the London-wide plan to mitigate the impacts of growth on the transport network, including roads.

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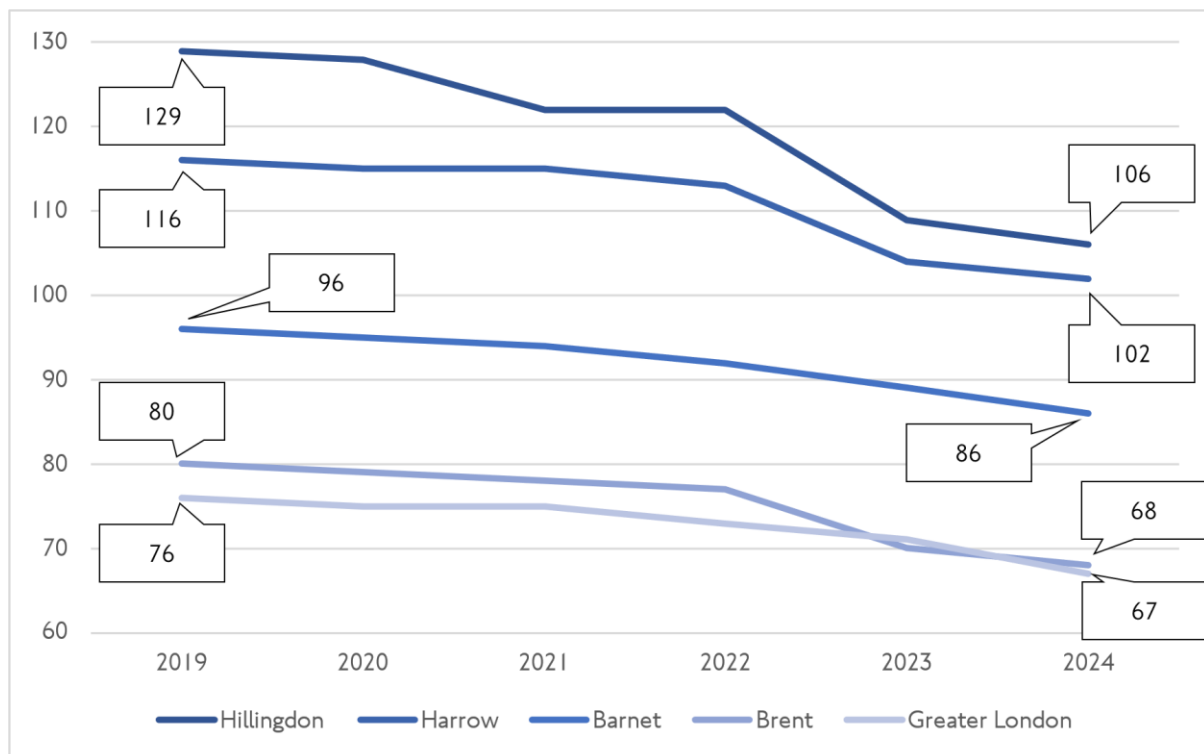


Figure 1 - Car ownership per 100 households in Harrow, surrounding boroughs and Greater London (source: Healthy Streets Scorecard, from DfT and ONS)

8. Additionally, the current mode shares in Harrow are not anomalous compared to the rest of outer London and the sustainable mode share has been increasing—in the past eight years it increased by c10 per cent. Total sustainable mode share is approximately 59 per cent, which compares to 62 per cent across outer London, and is very close to the median for outer London boroughs.

| | Harrow | Outer London | Greater London |
|--------------------------|--------|--------------|----------------|
| National Rail/Overground | 7% | 15% | 14% |
| Underground/ DLR | 29% | 17% | 21% |
| Bus/tram | 10% | 14% | 16% |
| Taxi/other | 1% | 1% | 1% |
| Car driver | 36% | 32% | 23% |
| Car passenger | 3% | 4% | 3% |
| Motorcycle | 0% | 1% | 1% |
| Cycle | 0% | 3% | 6% |
| Walk | 13% | 13% | 16% |
| | 100% | 100% | 100% |

Figure 2 - Mode share in Harrow, outer London and Greater London (LTDS, 2022/23-2023/24 two-year average)

9. This site allocation should not cross-reference Part H of Policy M2. Please see our comments on the draft Policy in our Matter 9 written statement.

O7 Rayners Lane station car park

12.17) The policy in relation to the above sites specifies that any new development will have to bring forward an appropriate level of parking – but how has this been factored into the capacity work undertaken? Is the policy sufficiently clear in this regard?

10. We have agreed several modifications through the SoCG (ref: LBH/EDI4, pp.18-19) which are not yet reflected within the Proposed Modifications (ref. LBH/ED9). These are, in summary, to remove all car parking requirements for the site, except for re-provision of Blue Badge car parking for station users given the excellent connectivity of the site and London Plan Policy which requires all sites with a PTAL of 5 to be car free.
11. This will accordingly impact site capacity, increasing it significantly given it is no longer proposed to provide car parking for the station or town centre.

12.18) How many car parking spaces will be lost as a result of the site allocation?

12. The station car park has 240 bays, including 6 disabled bays and 3 motorcycle bays. The Council has correctly identified the site as having the potential for housing as set out in Part 6 (a) of London Plan Policy SD7 which identifies car parks, particularly in town centres, as an appropriate source of housing capacity. Therefore the loss of car parking on the site is supported in policy and is supported. It would be counter to London Plan policy to re-provide any car parking on the site, except for Blue Badge car parking.
13. As stated above, the site is very well-connected being PTAL 5 and benefiting from Metropolitan and Piccadilly line services to a number of destinations, as well as several bus services to other destinations not served by direct Underground services.

Q12.19 A number of the sites which the Council are identifying as site allocations are existing car parks, some of which are connected to public transport nodes. I also note that a number of station car parks are included and from an initial view as well as those expressed by the Regulation 19 representations, many appear to be well used facilities. I also note⁴ that Harrow has a significantly higher rate of car ownership (75.2%) compared to the London average (57.9%) reflecting the significantly higher rates of car use and distance travelled to get to work compared with the London average.

Please could the Council advise on the following:

- *Total number of car parking spaces to be lost through the plan period;*
- *Have the Council completed any surveys of existing use and capacity of the existing car park(s)? Are the results of these surveys available?*
- *Have the Council considered any implications of the removal of the car park for the allocated centre/transport node (where relevant)*
- *Where no replacement car parking is proposed at station car parks, for example allocation 07 Raynes Lane station car park, what are the implications for this strategy in terms of existing parking at the site and the existing users of the car park?*
- *In what way will the Council ensure that policy M2 (H) is addressed as part of any development proposals and should the site allocations (where applicable) include a cross reference to this policy for effectiveness?*

14. Please see our comments above in paragraphs 4-9. Additionally, the Council may need to consider further on-street parking controls to minimise impacts on surrounding streets, as required by London Plan Policy T6 C.

O20 Canons Park station car park

15. Our concerns raised in response to the Regulation 19 consultation remain valid. While TfL supports the proposed Additional Modification (ref. LBH/ED9, pg. 28-29) to remove the requirement for car parking associated with the development, we do not support the continued requirement to re-provide car parking for the station.

12.17) The policy in relation to the above sites specifies that any new development will have to bring forward an appropriate level of parking – but how has this been factored into the capacity work undertaken? Is the policy sufficiently clear in this regard?

16. Reprovision of car parking does appear to have been factored into the capacity calculations, given the site capacity appears low for a station-adjacent site. A similar site (ref. 3417/22) at Barkingside station delivered 98 dwellings.

12.18) How many car parking spaces will be lost as a result of the site allocation?

17. Canons Park station currently has 153 car parking spaces. No car parking should be reprovided at the station, except for an appropriate quantum of

Blue Badge spaces, which may be most suitably provided on-street. The policy justification is set out below.

Q12.19 A number of the sites which the Council are identifying as site allocations are existing car parks, some of which are connected to public transport nodes. I also note that a number of station car parks are included and from an initial view as well as those expressed by the Regulation 19 representations, many appear to be well used facilities. I also note⁴ that Harrow has a significantly higher rate of car ownership (75.2%) compared to the London average (57.9%) reflecting the significantly higher rates of car use and distance travelled to get to work compared with the London average.

Please could the Council advise on the following:

- *Total number of car parking spaces to be lost through the plan period;*
- *Have the Council completed any surveys of existing use and capacity of the existing car park(s)? Are the results of these surveys available?*
- *Have the Council considered any implications of the removal of the car park for the allocated centre/transport node (where relevant)*
- *Where no replacement car parking is proposed at Station Car Parks, for example allocation 07 Raynes Lane station car park, what are the implications for this strategy in terms of existing parking at the site and the existing users of the car park?*
- *In what way will the Council ensure that policy M2 (H) is addressed as part of any development proposals and should the site allocations (where applicable) include a cross reference to this policy for effectiveness?*

18. Surveys conducted in 2017 and 2019 indicate that station car park users represent only 3.6 per cent of station users, and therefore represent a negligible proportion of those using the station while increasing car travel at peak times.

19. Additionally, 33 per cent of station car park users live within 2km of the station, enabling trips to the station to be done by bus or active travel. It should also be noted that there are three further Underground stations (Stanmore, Queensbury and Edgware) within a 2km radius of Canons Park station, including Edgware station on the Northern line.

20. Canons Park station is also directly served by three bus routes: the 79 from Stonebridge Park to Edgware (every 10 minutes), the 186 from Northwick Park Hospital to Brent Cross (every 10 minutes) and the 340 from Harrow bus station to Edgware (every 12 minutes). Given the availability of nearby Underground stations in this area, along with local bus services to access

the stations, we consider that other modes can be used to access the station and therefore redevelopment of the car park is acceptable.

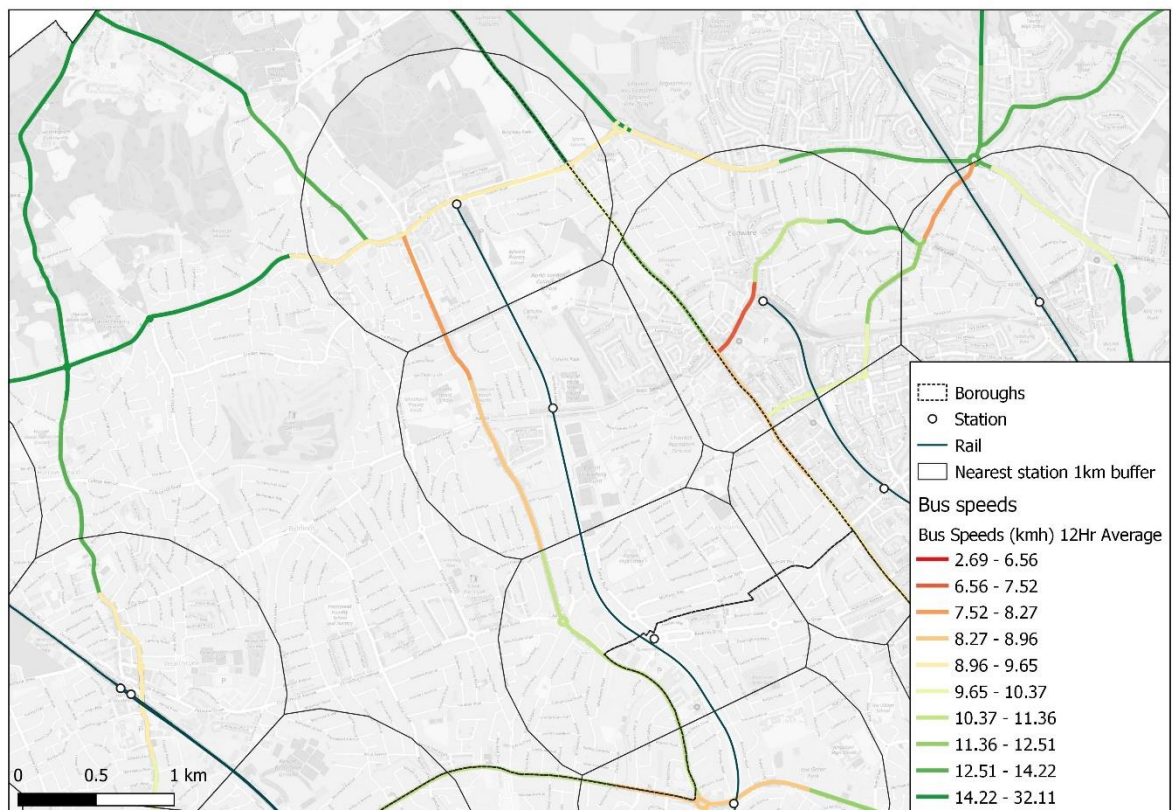


Figure 3 - Nearest rail station within 1km and 12-hour average bus speeds on the TLRN and SRN (Base map: OSM)

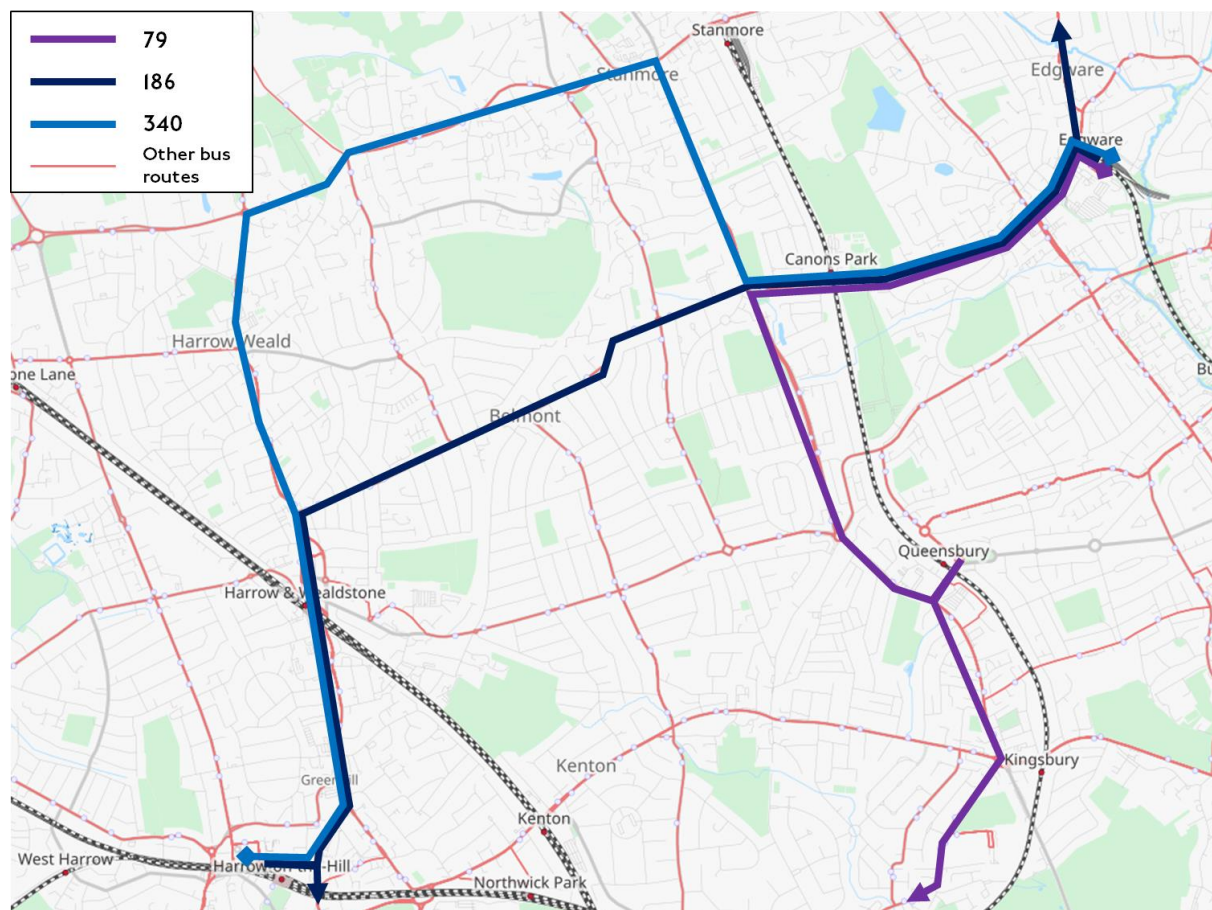


Figure 4 - Bus routes directly serving Canons Park station and wider bus network (Base map: OSM)

21. A further 55 per cent of station car park users live greater than 5km from the station. These users are likely to live beyond the Greater London boundary and are choosing to drive to a non-local station, seeking to take advantage of relatively inexpensive car park charges and lower Zone 5 fares on London Underground. In most instances there is a more suitable rail or Underground station available nearby that does not generate unnecessarily longer car travel during peak times. We consider that more distant car park users are therefore putting unnecessary pressure on the road network rather than using sustainable modes or a local station, thus having a negative impact on strategic issues such as bus speeds, congestion and road safety.
22. The impact on bus journey times is particularly important, as allowing for increases in car journeys can lead to a vicious cycle of longer bus journey times, making the bus less attractive and leading to more people driving, further worsening bus journey times. Removing car parking has the inverse effect and can lead to a virtuous cycle which not only makes travelling by bus more attractive, but also reduces the cost of operating the bus network and enables TfL to increase the number of services it operates sustainably. Increasing the population density of suburban London also contributes to

the financial viability of operating the bus network and can support, for example, increased frequencies which make bus travel more convenient for Londoners. Taken together, this means that reprovision of car parking at Canons Park and other stations runs counter to the Transport strategic objective and Strategic Policy I0 of the draft Plan, as well as London Plan Policy T1 and the Mayor's Transport Strategy.

23. 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 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.'
24. Inspectors' reports for appeals concerning residential development on other outer London station car parks including Arnos Grove (ref. APP/Q5300/W/21/3276466) and Wembley Park (ref. APP/T5150/V/21/3275339) station car parks also highlight that trips could be better made by walking, cycling or using public transport to access the station or by using a nearer local station, and that the risk of overspill parking on local streets could be mitigated through the use of controlled parking zones as required by London Plan Policy T6 C.
25. As set out in our Statement of Common Ground (ref: LBH/ED14, pp.34-37), car parking also does not contribute to the strategic function of the 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 (as stated above in paragraph 5). Conversely, there is no policy support for park and ride facilities anywhere in the London Plan.
26. Ultimately, the site is considered well-connected and, therefore, to be in line with London Plan policy T6, the starting point for development in this location is car-free.
27. Please additionally see our comments in paragraphs 4-9 which also apply to this site allocation.

O22 Stanmore station car park

28. Our concerns raised in response to the Regulation I9 consultation remain valid. While TfL welcomes that the proposed Additional Modification (ref.

LBH/ED9, pg. 28-29) means that the site allocation text no longer implies a requirement for car parking for residents of any development, we do not support the continued requirement to re-provide car parking for the station. All car parking requirements for this site should be deleted to ensure that it complies with the London Plan.

12.17) The policy in relation to the above sites specifies that any new development will have to bring forward an appropriate level of parking – but how has this been factored into the capacity work undertaken? Is the policy sufficiently clear in this regard?

29. Reprovision of car parking does appear to have been factored into the capacity calculations, given the site capacity appears remarkably low for a station-adjacent site. The previous proposals for the site had a substantially higher proposed number of dwellings than set out in the site allocation in spite of retaining some of the station car parking. However, we do not support the reprovision of station car parking on this site, as set out below, and this will lead to a higher potential capacity for the site and ensuring that the housing capacity of this well-connected site is optimised.

12.18) How many car parking spaces will be lost as a result of the site allocation?

30. Stanmore station currently has 434 car parking spaces. No car parking should be reprovided at the station, except for an appropriate quantum of disabled persons car parking. The policy justification is set out below.

Q12.19 A number of the sites which the Council are identifying as site allocations are existing car parks, some of which are connected to public transport nodes. I also note that a number of station car parks are included and from an initial view as well as those expressed by the Regulation 19 representations, many appear to be well used facilities. I also note⁴ that Harrow has a significantly higher rate of car ownership (75.2%) compared to the London average (57.9%) reflecting the significantly higher rates of car use and distance travelled to get to work compared with the London average.

Please could the Council advise on the following:

- *Total number of car parking spaces to be lost through the plan period;*
- *Have the Council completed any surveys of existing use and capacity of the existing car park(s)? Are the results of these surveys available?*
- *Have the Council considered any implications of the removal of the car park for the allocated centre/transport node (where relevant)*
- *Where no replacement car parking is proposed at Station Car Parks, for example allocation 07 Raynes Lane station car park, what are the*

implications for this strategy in terms of existing parking at the site and the existing users of the car park?

- *In what way will the Council ensure that policy M2 (H) is addressed as part of any development proposals and should the site allocations (where applicable) include a cross reference to this policy for effectiveness?*

31. While larger than Canons Park station car park, Stanmore station also has higher weekday ridership of approximately 12,000 journeys per day. Therefore station car park users represent a negligible proportion of those using the station while having a potentially significant impact on road capacity at peak times.
32. Surveys done in 2018 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 potentially everyone in this group lives outside Harrow, or at least a significant majority. They are also likely to live outside Greater London. Of station car park users, 48 per cent live more than 5km from the station and have access to a rail or Underground station closer to where they live.
33. 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. Additionally, 17 per cent of station car park users live within 2km of Stanmore station, enabling trips to the station to be done by bus or active travel. While similar principles apply to Canons Park station, the overriding issue is that the majority of station car park users are choosing to drive to a non-local station during the peak period to take advantage of relatively inexpensive car parking and Zone 5 fares on London Underground. In most instances, a more suitable rail or Underground station available nearby that does not generate unnecessarily longer car travel during peak times. We consider that more distant car park users are therefore putting unnecessary pressure on the road network rather than using sustainable modes or a local station, thus having a negative impact on strategic issues such as bus speeds, congestion and road safety.
34. The impact on bus journey times is particularly important, as allowing for increases in car journeys can lead to a vicious cycle of longer bus journey times, making the bus less attractive, and leading to more people driving further worsening bus journey times. Removing car parking has the inverse effect and can lead to a virtuous cycle which not only makes travelling by bus more attractive, but also reduces the cost of operating the bus network and enables TfL to increase the number of services it operates sustainably. Increasing the population density of suburban London also contributes to the financial viability of operating the bus network and can support, for example, increased frequencies which make bus travel more convenient for Londoners. Taken together, this means that reprovision of car parking at

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Stanmore and other stations runs counter to the Transport strategic objective and Strategic Policy I0 of the draft Plan, as well as London Plan Policy TI and the Mayor's Transport Strategy.

35. The site is well-connected; the station entrance and immediate surroundings are PTAL 4, while the site itself is PTAL 3 and benefits from frequent Jubilee line services and is served directly by three bus routes: the 142 from Watford to Brent Cross (every 12 minutes), the 324 from Centennial Park (Elstree) to Brent Cross (every 20 minutes) and the H12 from Stanmore to South Harrow bus station (every 10 minutes). Additionally, the site is approximately 600 metres from the 340 which operates from Harrow bus station to Edgware (every 12 minutes).
36. Given the shape and proximity of the Green Belt where people do not normally live, station car park users who live within 5km of the station will in most instances be able to access the station via one of these bus routes, walking, cycling or be able to use another nearby station, such as those on the Lioness line (London Overground) or Northern line. Given the availability of nearby Underground and Overground stations in this area, along with local bus services to access the stations, we consider that other modes can be used to access the station and therefore redevelopment of the car park is acceptable.



Figure 5 - Nearest rail station within 1km and 12-hour average bus speeds on the TLRN and SRN (Base map: OSM)

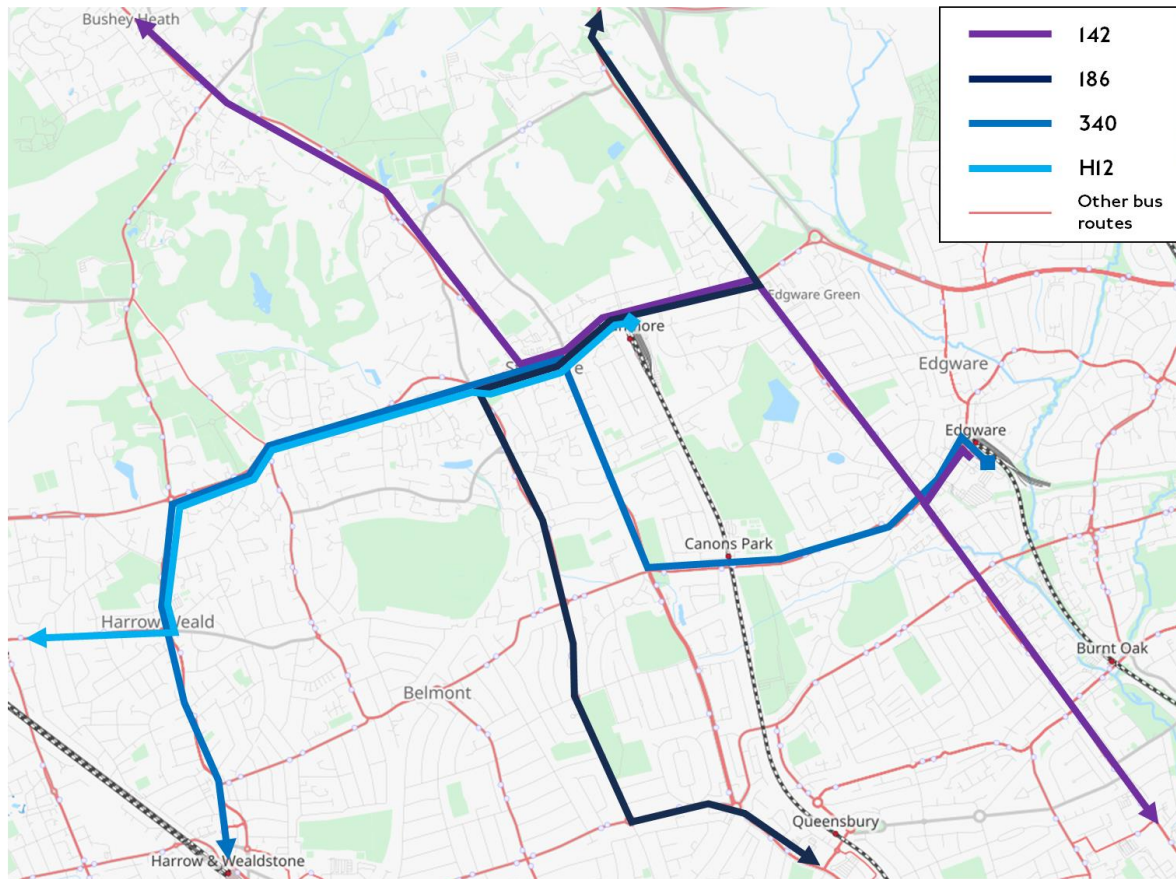


Figure 6 - Bus routes directly serving Stanmore station and wider bus network (Base map: OSM)

37. Inspectors' reports for appeals concerning residential development on other outer London station car parks including Arnos Grove (ref. APP/Q5300/W/21/3276466) and Wembley Park (ref. APP/T5150/V/21/3275339) station car parks also highlight that trips could be better made by walking, cycling or using public transport to access the station or by using a nearer local station, and that the risk of overspill parking on local streets could be mitigated through the use of controlled parking zones as is required by London Plan Policy T6 C.
38. As stated above and in our Statement of Common Ground (ref: LBH/EDI4, pp.37-42), 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. Ensuring that people live closer to such infrastructure, rather than needing to travel by other modes to access the station also contributes to making best use of land (London Plan Policy GG2). It is the actual strategic function of the station that makes it even more important to make best use of land around the station.
39. 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 (as set out in paragraph 5). 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.

- 40. We note concerns around impacts of parking on Wembley Stadium event days, however this is an issue of enforcement. As noted elsewhere, London Plan Policy T6 C 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 ineffective parking controls would not align with London Plan policy.
- 41. Given the above, the site is considered well-connected and, therefore, to be in line with London Plan policy T6, the starting point for development in this location is car-free, including for station car parking.
- 42. Please additionally see our comments in paragraphs 4-9 which also apply to this site allocation.

12.20) There also appears to be a variance of approach in terms of referencing replacement car parking on some but not all of the sites. What evidence has been used to inform the approach taken? Where allocations refer to the replacement of sufficient car parking is it clear what this would mean in practice?

- 43. This is a matter for the Council, however as stated above, in order for the Plan to comply with London Plan policies, site allocations should align with the car parking standards set out in Tables I0.3-5 of the London Plan, as well as London Plan Policy T6 B which sets out that the starting point for development proposals which are well-connected by public transport be car-free, with less well-connected sites being car-lite, as reflected in Policy M2 A of the draft Plan.