



Places for London  
Property Development

Victoria Station House  
191 Victoria Street  
London SW1E 5NE

[placesforlondon.co.uk](https://placesforlondon.co.uk)

Date: 5 June 2025  
Our ref: TfL/Places/VSH/BH – Harrow Local Plan EiP  
Your ref: –

Louise St John Howe  
Programme Officer,  
PO Services  
PO Box 10965,  
Sudbury,  
Suffolk,  
CO10 3BF

By email: [louise@poservices.co.uk](mailto:louise@poservices.co.uk)

Dear Ms St John Howe,

**HARROW'S NEW LOCAL PLAN 2021 – 2041  
INSPECTORS MATTERS, ISSUES AND QUESTIONS  
PLACES FOR LONDON (ID: 206) STATEMENTS ON MATTERS 6 AND 7**

We are writing to provide our Statements in response to the Inspector's Matters, Issues and Questions (MIQs) prior to the Examination in Public (EiP) of London Borough of Harrow's Draft New Local Plan. We are responding to matters 6 (Site Allocations) and 7 (Design and the Historic Environment).

Places for London (Places) is Transport for London's (TfL) property company. It manages TfL's commercial property assets and develops its surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations. Places has submitted [Reg I9 representations](#) (ID ref: 206, dated 17 December 2024).

Please note that our attached Statements on matters 6 and 7 are the views of the Places' planning and design team in its capacity as a significant landowner, developer and landlord in Harrow borough only and are separate from any responses that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided separate responses at the various stages of preparation of the draft Harrow New Local Plan in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. We understand that TfL has signed a Statement of Common Ground with the Council.

As per our email of 23 May 2025, we have registered to participate in the following Examination Hearings:

- **Hearing Day 6 – Wednesday 9 July 2025, Morning session (1000-1300):** Matter 6 Site Allocations including the Harrow & Wealdstone Opportunity Area (Chapter II), *Site Allocation OA2 Harrow on the Hill Underground and Bus Stations*
- **Hearing Day 6 – Wednesday 9 July 2025, Afternoon session (1400-1630):** Matter 6 Site Allocations (Chapter II), *Site Allocations O7 – Rayners Lane Station Car Park, O20 – Canons Park Station Car Park and O22 – Stanmore Station Car Park*
- **Hearing Day 7 – Thursday 10 July 2025, Morning session (1000-1300):** Matter 6 Site Allocations (Chapter II), *Site Allocations O7 – Rayners Lane Station Car Park, O20 – Canons Park Station Car Park and O22 – Stanmore Station Car Park*
- **Hearing Day 7 – Thursday 10 July 2025, Afternoon session (1400-1630):** Matter 7 Design and the Historic Environment (Strategic Policy 02, Chapters 2 and 3, policies GRI, GR2, GR3, GR3A, GR4, GR4A, GR5, GR6, HE1, CNI)

We trust that our attached written Statements and appendix are clear and helpful. If you need any further information or clarification at this stage, please do not hesitate to contact me or my colleague Andrew Russell.

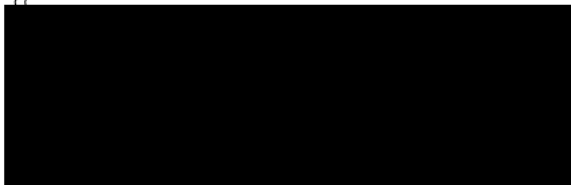
We would be grateful if you could confirm receipt of this letter and the Statements.

Yours sincerely



**Brendan Hodges**  
**Planning Manager (Residential and Commercial)**  
**Places for London**

cc



encs.

Appendix I: Canons Park Station Car Park Map

# London Borough of Harrow's New Local Plan 2021 – 2041 Examination in Public

## Places for London (ID: 206)

### Written Statements

Places for London (Places) is Transport for London's (TfL) property company. It manages TfL's commercial property assets and develops its surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations. It has agreed a portfolio approach to the delivery of affordable housing with the Mayor of London. This requires Places portfolio sites to deliver 50% affordable housing across its London-wide portfolio, provided that at least 35% affordable housing is provided on each site. Please see London Plan policy H4 (delivering Affordable Housing) and supporting text for more information. Places has four sites for potential housing-led redevelopment in LB Harrow:

- Land adjacent to Harrow on the Hill station (Metropolitan Line and National Rail)
- Rayners Lane station car park (Metropolitan and Piccadilly Lines)
- Canons Park station car park (Jubilee Line)
- Stanmore station car park (Jubilee Line)

Places has submitted [Reg I9 representations](#) (ID ref: 206, dated 17 December 2024) which remain relevant to the EIP. Where necessary, in this document we provide information and clarification additional to our Reg I9 representations in response to the Inspector's MIQs and LBH's Main Modifications.

# Matter 6 (Site Allocations including the Harrow and Wealdstone Opportunity Area Strategy)

## Issue I2: Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy and in general conformity with the London Plan

### Site Allocation OA2 – Harrow on the Hill Underground and Bus Stations

Statement prepared by Andrew Russell

#### Main Modifications

LBH proposes no [Main Modifications \(ref: LBH/ED9\)](#) in respect of this site allocation.

#### Additional Modifications

Places objects to the [Additional Modifications \(ref: LBH/ED9\)](#) (page I9) in relation to the risk of surface water flooding, which states: *“Development should be directed away from the northern area of the northern site and southeast area of the southern site where there is higher risk of surface water flooding”*.

This change is not necessary to make the Plan sound and is not justified by evidence or national / strategic planning policy.

The site is in Flood Zone I where the proposed residential and commercial uses would be considered ‘compatible’ uses in terms of the NPPF and Planning Practice Guidance.

Issues associated with the risk of surface water flooding, management, safety and evacuation would be addressed and appropriately mitigated and resolved via a combination of above and below ground sustainable urban drainage (SuDs) systems. This would be detailed at pre-application and application stage as part of a Flood Risk Assessment and drainage strategy and the details would be submitted and approved by the Council and secured by condition. This approach would be in accordance with the NPPF, Planning Practice Guidance, London Plan Policies SII2 and SII3 and draft Local Plan Policies CN3 and CN4.

The proposed text would limit the potential for development in these areas of the site. This would unnecessarily constrain the development potential of a highly sustainable site adjacent to London Underground and National Rail infrastructure. A greater degree of flexibility is required. We consider that the following changes should be made:

*“Development ~~should be directed away from~~ in the northern area of the northern site and southeast area of the southern site where there is higher risk of surface water flooding ~~should incorporate sustainable urban drainage systems in line with Policy CN4 and manage the risk of flooding in line with Policy CN3.~~”*

Strategic Policy 05: Harrow & Wealdstone Opportunity Area

*Q12.1 In what way does the policy wording recognise the interface between the opportunity area and the surrounding lower rise areas?*

No comment

*Q12.2 Is the policy sufficiently flexible in terms of focusing higher density development to other sustainable locations outside of the Harrow & Wealdstone Opportunity Area?*

No comment

*Q12.3 Part A (b) of the policy refers to supporting the delivery of a minimum of 1000 jobs within the opportunity area, as well as supporting employment floorspace to meet the evidenced needs of the Borough. Is the policy sufficiently precise regarding what these needs are? Is the policy clear as to how the delivery of 1000 jobs identified will be addressed and should the policy be more precise in this regard? In what way does the policy as drafted accord with the Framework concerning strategic policies?*

No comment

*Q12.4 Parts D, G and H of the policy address the Harrow Metropolitan Town Centre, Station Road and Wealdstone District Centre respectively. A number of representors have raised concerns regarding the designation of the Station Road area within this policy. Are these concerns justified?*

No comment

*Q12.5 Is the approach to the Harrow and Wealdstone Opportunity Area consistent with the London Plan? Concerns have been expressed regarding the capacity of the area to accommodate the growth expected through this Plan period, as well as the impact on the surrounding neighbouring areas. The London Plan identified that the HWOA will accommodate growth for at least 5000 homes and 1000 jobs. Paragraph 2.1.1 advises that when developing policies for development plans, boroughs should use the indicative capacity figures as a starting point, to be tested through the assessment process.*

No comment

*Q12.6 Where in the evidence base is the capacity assessment undertaken to support the figures set out within the policy. Is the policy justified?*

No comment

*Q12.7 Is the area as defined within the Plan the same as the London Plan? If not why not?*

No comment

*Q12.8 Could the Council set out (in a table form) the quantum of growth already accommodated within the area?*

No comment

*Q12.9*

- *Are the site allocations correctly drawn and are the boundaries justified?*
- *What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?*
- *In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?*
- *Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures?*



- *In terms of the identified uses and policy considerations, are these based on sound evidence?*

We are content with the term 'indicative residential capacity' but would not object to these being identified as 'minimum capacity figures'. In any event, an appropriate degree of flexibility should be applied, noting that the development capacity of each site will need to be optimised through a design-led process, in line with the London Plan.

*Q12.10 Have all the concerns raised by Historic England and the Ministry of Defence been adequately addressed? The Council should set out a table confirming their response to each of the individual points raised.*

No comment

*Q12.11 Thames Water have provided detailed commentary in relation to a number of the site allocations proposed. In what way has the Council sought to engage with Thames Water in relation to the comments raised?*

No comment

*Q12.12 On the sites where Thames Water have identified that there are concerns regarding the capacity of the water network to accommodate the growth envisaged, are these concerns valid and should there be reflected within the policy wording as well as the IDP?*

No comment

*12.13 The Council have specified within CSD05 that site allocation capacities have been informed by design-led capacity studies. This is set out at EBH01 which identifies at paragraph 4.24 that where design led capacities have been used, a further 10% uplift has been applied. The justification for this is set out at appendix A. Given that the text recognises that the previous capacity approach was based on a density matrix approach, is the 10% uplift justified? Have the Council taken into account the representation made by CPR regarding tree planting and woodland creation in relation to sites HRW001 – HRW005? If not why not?*

No comment

*Q12.17 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?*

No comment

*Q12.18 How many car parking spaces will be lost as a result of the site allocation?*

The Harrow on the Hill surface car park (for station users) 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 used by TfL / LUL, with the remainder leased to a financial business and available to permit holders only.

*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 note 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 Rayners 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?*

For Site OA2 – Harrow on the Hill Underground and Bus Station, the draft site allocation does not require re-provision of the 88 station car park spaces or the permit holder spaces which are located in the existing multi-storey car park. This approach is considered to be in accordance with the approach to car parking in the London Plan and the modal shift targets in the Mayor's Transport Strategy. As with other car park sites within our development portfolio in London, our approach would be to ensure re-provision of disabled parking spaces (no reduction) and any required operational parking only.

This is a highly accessible town centre and Opportunity Area site which is very well-served by high frequency rail, tube and bus services and has a Public Transport Access Level of 6b (*this is on a scale of 0 to 6b where 6b represents the highest level of connectivity to the overall public transport network*). It is therefore not considered appropriate for re-provision of car parking.

It is worth noting that this would be part of a comprehensive high quality / high density residential-led, mixed-use scheme alongside the potential transport and public realm improvements required by the site allocation. Therefore, loss of car parking in this location would be justified by the particular site location and characteristics and would be mitigated by significant public transport improvements.

*Q12.20 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 replacement of sufficient car parking is it clear what this would mean in practice?*

No comment

## Site Allocation O7 – Rayners Lane Station Car Park

Statement prepared by Brendan Hodges

### Main Modifications

LBH proposes no [Main Modifications \(ref: LBH/ED9\)](#) in respect of this site allocation.

### Additional Modifications

Places mostly supports the [Additional Modifications \(ref: LBH/ED9\)](#) (page 25) proposed in respect of this site allocation, specifically: deletion of the requirement to re-provide car parking (except for disabled persons), and clarification that development will contribute towards the provision of step-free access to Rayners Lane Station commensurate with the quantum of development.

We consider that these modifications (together with those set out below and in our Reg I9 representations) are required for this aspect of the Local Plan to be 'sound'.

However, if the requirement for car parking is deleted, then we cannot see why the following (modified) paragraph is required:

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

We consider that this whole paragraph should be deleted in line with the other proposed modifications. We are particularly concerned about the addition of reference to the District Centre because the existing TfL car park is provided for the use of commuters and other London Underground passengers; it is not a town centre car park.

Similarly, the following (modified) paragraph should also be deleted in line with the other proposed modifications:

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

Taken as a whole, the additional modifications do not go far enough to address the issues raised in our Reg I9 representations, most of which remain relevant.

## MIQs

### Q12.9

- *Are the site allocations correctly drawn and are the boundaries justified?*
- *What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?*
- *In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?*
- *Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures?*
- *In terms of the identified uses and policy considerations, are these based on sound evidence?*

These questions are directed to the Council. However, we hope the following is helpful in respect of some of the issues raised.

The site allocation **boundary** should be redrawn to exclude the single storey commercial buildings fronting Alexandra Avenue which we are not currently proposing to redevelop. Should we decide to refurbish or redevelop the Alexandra Avenue properties at some point in the future, they could be brought forward without a need for a site allocation. The site allocation boundary should be corrected in line with the map provided in our Reg I9 representations (page I9).

In terms of the **lead time** for delivering development on this site, given multiple ownership (London Underground Limited, Places and LBH) and viability challenges to development, we would suggest a 5-10 years timescale.

Given the relatively modest number of new homes that could be delivered here (see below) we do not consider that there should be significant **infrastructure** requirements that would go beyond usual CIL and SI06 contributions, including a contribution towards the provision of step-free access to Rayners Lane Station that is commensurate with the quantum of development.



We consider the **quantum of floorspace/ units** to be far too low to optimise the development opportunity in accordance with London Plan Policies for the reasons set out in our Reg I9 representations (page 21).

In terms of the **identified uses**, we consider that the site is very suitable for higher density housing in conformity with the London Plan (particularly policies SD6, D3 and HI). However, as explained in our Reg I9 representations (page 20), we have struggled with scheme viability at this site and at the present time housing may still not be viable. Therefore, we have suggested that alternative or complimentary uses should also be allocated in order that this underused site can be optimised and brought into use. Potentially the site may also be suitable for Class E and / or industrial / warehousing / logistics uses, either as an alternative to housing development, or as part of a housing-led, mixed-use scheme.

*Q12.I0 Have all the concerns raised by Historic England and the Ministry of Defence been adequately addressed? The Council should set out a table confirming their response to each of the individual points raised.*

Places has no objection in principle to the [Historic England Reg I9](#) suggestion (page 14, ref: HE40) that heritage considerations are mentioned in this site allocation (the site adjoins the Grade II listed station). However, we would suggest that the example text provided should be amended to conform more closely with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, along the lines of:

*“Development should seek to conserve ~~or and~~ enhance the significance of ...”*

The following text should refer to eg. the setting of the listed building.

The Ministry of Defence (MOD) safeguarding and consultation requirements set out on page 8 of their [Reg I9 representations](#) are noted and will be adhered to.

*Q12.II Thames Water have provided detailed commentary in relation to a number of the site allocations proposed. In what way has the Council sought to engage with Thames Water in relation to the comments raised ?*

Thames Water, in their [Reg I9 response](#) (page 9) envisage no water network or sewage (STW) infrastructure concerns.

*Q12.I2 On the sites where Thames Water have identified that there are concerns regarding the capacity of the water network to accommodate the growth envisaged, are these concerns valid and should there be reflected within the policy wording as well as the IDP?*

N/A

*I2.I3 The Council have specified within CSD05 that site allocation capacities have been informed by design -led capacity studies. This is set out at EBH01 which identifies at paragraph 4.24 that where design led capacities have been used, a further 10% uplift has been applied. The justification for this is set out at appendix A. Given that the text recognises that the previous capacity approach was based on a density matrix approach, is the 10% uplift justified? Have the Council taken into account the representation made by CPR regarding tree planting and woodland creation in relation to sites HRW001 – HRW005? If not why not?*

We maintain the position expressed in our Reg I9 representations (page 21) that the Council's indicative residential capacity of 69 homes would not optimise the development opportunity provided by this underused site. It does not conform with the adopted London Plan requirements of policies DI, D3 and HI to make the best use of land and optimise the capacity of sites. It must be increased for the Plan to be 'sound'.

According to the Council's [Site Selection / Allocation Methodology](#) (page 24) a 10% uplift has not been applied.

*Q12.17 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?*

The site has PTAL of 3-4 and adjoins a London Underground station. There are local bus stops, taxi bays and cycle parking for interchange. In accordance with London Plan Table I0.3 (Maximum Residential Parking Standards) the maximum car parking provision would be 0.5 – 0.75 spaces per dwelling. In this case we would be likely to propose a 'car free' (or possibly 'car lite') development, given easy access to public transport and to promote the use of public transport and active, healthy travel in line with the London Plan and Mayor's Transport Strategy. As well as enabling the optimisation of housing delivery on the site, this also has significant benefits in terms of ground level public realm, amenity space and green, landscape setting.

*Q12.18 How many car parking spaces will be lost as a result of the site allocation?*

The station car park has 240 bays, including 6 disabled bays and 3 motorcycle bays. The disabled bays would be reprovided.

Please note that the Secretary of State for Transport has already consented to the disposal of the car park at Rayners Lane to enable the delivery of a number of affordable homes. The consent, required pursuant to [Section 163](#) of the [Greater London Authority Act 1999](#), was granted on 24 July 2019. A copy can be provided if required.

*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 note 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?*

These questions are directed to the Council. However, we hope the following is helpful in respect of some of the issues raised.

As set out above, we support the Council's [Additional Modifications \(ref: LBH/ED9\)](#) (page 25) deletion of the requirement to reprovide car parking (except for disabled persons). However, the modified text is ambiguous because it then goes on to refer to town centre car parking. The existing TfL car park is provided for commuters and other London Underground passengers; it is not a town centre car park. We do not intend to provide a town centre car park on this site.

We maintain the position expressed in our Reg I9 representations (pages I9-20) that if the site is redeveloped for a housing and / or commercial scheme, the car park will close and it is most likely that only disabled parking for station-users will be reprovided. As a minimum, the number of car parking spaces will be very significantly reduced. We consider this to be in conformity with:

- **NPPF:** for eg. para I25 which promotes and supports the development of under-utilised land and buildings for new homes and lists *“car parks, lock-ups and railway infrastructure”* specifically.
- **London Plan:** including policies: HI which sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially for the mixed-use redevelopment of car parks and sites with PTALs 3-6 or within 800 metres of a station; SD7 (C) (6) which says boroughs should identify town centre sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example, surface car parks; TI which seeks a modal shift across Outer London, with 75% of all trips being made by walking, cycling and public transport by 204I; and T6 which sets out that car-free development should be the starting point for all development proposals in places well-connected by public transport, and that the absence of local on-street parking controls should not be a barrier to new development.
- **Mayor’s Transport Strategy:** which identifies that car dependency has contributed to an increase in poor public health across London and streets that are often polluted, congested and dangerous, and unwelcoming places to walk or cycle. It provides a framework to address this and also recognises that transport is key to unlocking housing potential. It aims for a better public transport experience and promotes the improvement of the areas around stations. For example, at page I3I it provides a vision for interchange as part of *“the whole journey”* in which *“Stations and stops will be designed for active, efficient and sustainable onward journeys. The first things passengers will see on emerging from the station will be clear walking directions and maps, cycle hire facilities, bus connections and an attractive, accessible and inclusive public realm, rather than car parking and pick-up / drop-off spaces.”*

TfL has not undertaken a car park users survey at Rayners Lane within the last seven years. At stations where we have done so, we have typically found that only a very small proportion of passengers travel to the station by car (for eg. 3.6% at Canons Park in LBH), and that a large majority of car park users could easily transfer their journey to bus or active travel (walk or cycle) or that they drive past other, closer stations with car parks.

In this regard, the Inspectors for the appeals concerning residential redevelopment of TfL car park sites at Arnos Grove (ref. APP/Q5300/W/2I/3276466) and Wembley Station Car Park (ref. APP/T5I50/V/2I/3275339) (like Rayners Lane, in Outer London locations) all made reference to the outcome of parking surveys that indicated trips could be better made locally by active and sustainable modes. The Inspectors considered that the benefits and harm arising from the loss of car parking on surrounding streets could be addressed by way of Controlled Parking Zones and considered the residual impacts from the loss of car parking on those unable to use any means other than car (for example those with mobility issues) in the planning balance. In both cases, the loss of car parking was found to be acceptable on balance.

Places will undertake car park and user surveys before disposal and / or planning permission is sought for redevelopment of this site.

The loss of car parking at this site would conform with national and strategic planning policies that seek the optimisation of brownfield sites for development, and would have significant public benefits in terms of encouraging walking, cycling and use of public transport, reducing congestion and improving road safety, improving air quality, supporting the viability and vitality



of town centres, maintaining inclusive access to the station and prioritising brownfield development opportunities. It would also have significant planning benefits in terms of addressing the dire need for housing in the borough and west London generally, including genuinely affordable housing, and optimising delivery.

It is an approach that has been adopted in adjoining Barnet borough for TfL car park sites, where the recently adopted [Local Plan](#) seeks provision of only essential car parking (for disabled persons or for operational reasons). For example, the proposed uses for redevelopment of the TfL High Barnet station (a terminus at the end of the Northern Line) car park site (No. 37) reads:

Residential led mixed use development with commercial uses, public realm and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons, reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.

*Q12.20 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 replacement of sufficient car parking is it clear what this would mean in practice?*

This is a matter for the Council.

## Site Allocation O20 – Canons Park Station Car Park

Statement prepared by Brendan Hodges

### Main Modifications

LBH proposes no [Main Modifications \(ref: LBH/ED9\)](#) in respect of this site allocation.

### Additional Modifications

While Places supports the [Additional Modifications \(ref: LBH/ED9\)](#) (pages 28-29) clarification that car parking is not required to support the development itself (ie. a housing scheme can be 'car free') we do not support the continued requirement to provide car parking for the station.

TfL and Places supports multi-modal interchange with the Jubilee Line but believes this should focus on other public transport modes (principally buses) and active travel (walking and cycling), not cars. Such an approach is in general conformity with the London Plan and also the Mayor's Transport Strategy.

Taken as a whole, the additional modifications do not address the issues raised in our Reg 19 representations, most of which remain relevant.

### MIQs

#### Q12.9

- *Are the site allocations correctly drawn and are the boundaries justified?*
- *What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?*
- *In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?*
- *Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures?*



- *In terms of the identified uses and policy considerations, are these based on sound evidence?*

These questions are directed to the Council. However, we hope the following is helpful in respect of some of the issues raised.

The site **allocation boundary** should be adjusted to exclude the land at the southern end which is used for the storage of ambulances and not currently available for development. Please see the map in Appendix I which shows the correct extent of the site enclosed by a red boundary and diagonal red lines denoting the Places for London leasehold. This map was submitted with our original 'call for sites' submissions.

In terms of the **lead time** for delivering development on this site, we may market the site as a development opportunity in the short term and so it is possible that, subject to achieving timely planning permission for a scale of development that is financially viable, new homes could start to be delivered within a five years timescale.

Given the relatively modest number of new homes that could be delivered here (see below) we do not consider that there should be significant **infrastructure** requirements that would go beyond usual CIL and SI06 contributions.

We consider the **quantum of floorspace/ units** to be far too low to optimise the development opportunity in accordance with London Plan Policies for the reasons set out in our Reg I9 representations (pages 24-25).

In terms of the **identified uses**, we consider that the site is very suitable for higher density housing in conformity with the London Plan (particularly policies SD6, D3 and HI).

*Q12.10 Have all the concerns raised by Historic England and the Ministry of Defence been adequately addressed? The Council should set out a table confirming their response to each of the individual points raised.*

Historic England has raised no specific concerns in relation to this site.

The Ministry of Defence (MOD) safeguarding and consultation requirements set out on page I0 of their [Reg I9 representations](#) are noted and will be adhered to (albeit there is very little prospect of developing the site at 91.4m in height).

*Q12.11 Thames Water have provided detailed commentary in relation to a number of the site allocations proposed. In what way has the Council sought to engage with Thames Water in relation to the comments raised ?*

Thames Water, in their [Reg I9 response](#) (page 9) envisage no water network or sewage (STW) infrastructure concerns.

*Q12.12 On the sites where Thames Water have identified that there are concerns regarding the capacity of the water network to accommodate the growth envisaged, are these concerns valid and should there be reflected within the policy wording as well as the IDP?*

N/A

*12.13 The Council have specified within CSD05 that site allocation capacities have been informed by design -led capacity studies. This is set out at EBH01 which identifies at paragraph 4.24 that where design led capacities have been used, a further 10% uplift has been applied. The justification for this is set out at appendix A. Given that the text recognises that the previous capacity approach was based on a density matrix approach, is the 10% uplift justified? Have the Council taken into account the representation made by CPR regarding tree planting and woodland creation in relation to sites HRW001 – HRW005? If not why not?*

We maintain the position expressed in our Reg I9 representations (pages 24-25) that the Council's indicative residential capacity of 26 homes would not optimise the development opportunity provided by this underused site. It does not conform with the adopted London Plan requirements of policies DI, D3 and HI to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be 'sound'.

According to the Council's [Site Selection / Allocation Methodology](#) (page 26) a 10% uplift has not been applied.

*Q12.17 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?*

The site has PTAL of 2-3 and adjoins a London Underground station. There are local bus stops on Whitchurch Lane, a minicab office next to the station and cycle parking for interchange. In accordance with London Plan Table I0.3 (Maximum Residential Parking Standards) the maximum car parking provision would be 0.5 – 0.75 spaces per dwelling. In this case we would be likely to propose a 'car free' (or possibly 'car lite') development, given easy access to public transport and to promote the use of public transport and active, healthy travel in line with the London Plan and Mayor's Transport Strategy. As well as enabling the optimisation of housing delivery on the site, this also has significant benefits in terms of ground level public realm, amenity space and green, landscape setting.

*Q12.18 How many car parking spaces will be lost as a result of the site allocation?*

The station car park has 153 bays, including 7 disabled bays and 1 motorcycle bay. The disabled bays would be reprovided.

Please note that the Secretary of State for Transport has already consented to the disposal of the car park at Canons Park to enable the delivery of a number of affordable homes. The consent, required pursuant to [Section 163](#) of the [Greater London Authority Act 1999](#), was granted on 24 July 2019. A copy can be provided if required.

*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 note 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?*

These questions are directed to the Council. However, we hope the following is helpful in respect of some of the issues raised.

We maintain the position expressed in our Reg I9 representations (pages 23-24) that if the site is redeveloped for housing, the car park will close and it is most likely that only disabled parking for station-users will be reprovided. As a minimum, the number of car parking spaces will be very significantly reduced. We consider this to be in conformity with:

- **NPPF:** for eg. para I25 which promotes and supports the development of under-utilised land and buildings for new homes and lists “*car parks, lock-ups and railway infrastructure*” specifically.
- **London Plan:** including policies: H1 which sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially for the mixed-use redevelopment of car parks and sites with PTALs 3-6 or within 800 metres of a station; T1 which seeks a modal shift across Outer London, with 75% of all trips being made by walking, cycling and public transport by 2041; and T6 which sets out that car-free development should be the starting point for all development proposals in places well-connected by public transport, and that the absence of local on-street parking controls should not be a barrier to new development.
- **Mayor’s Transport Strategy:** which identifies that car dependency has contributed to an increase in poor public health across London and streets that are often polluted, congested and dangerous, and unwelcoming places to walk or cycle. It provides a framework to address this and also recognises that transport is key to unlocking housing potential. It aims for a better public transport experience and promotes the improvement of the areas around stations. For example, at page I31 it provides a vision for interchange as part of “*the whole journey*” in which “*Stations and stops will be designed for active, efficient and sustainable onward journeys. The first things passengers will see on emerging from the station will be clear walking directions and maps, cycle hire facilities, bus connections and an attractive, accessible and inclusive public realm, rather than car parking and pick-up / drop-off spaces.*”

TfL undertook user and occupancy surveys at Canons Park car park in 2017 and 2019 respectively. Headlines from these include that users of the station car park make up a small minority of total station users, representing only 3.6% of people using the station (according to the 2019 survey). Approximately 33% of respondents to the 2017 survey lived within 2km of the station car park and there is, therefore, significant potential to increase the number of walking and cycling trips by such users, so reducing the number of station public car park users travelling short distances by car. And 55% of respondents drove distances of 5km or more, and in some instances considerably further, to take advantage of the relatively inexpensive parking charges, secured parking, and lower travelcard costs which the Zone 5 station offers. The car parking therefore serves a largely remote group of users who have other public transport options open to them in closer proximity to their point of origin<sup>1</sup>.

In this regard, the Inspectors for the appeals concerning residential redevelopment of TfL car park sites at Arnos Grove (ref. APP/Q5300/W/21/3276466) and Wembley Station (ref. APP/T5150/V/21/3275339) (like Canons Park, in Outer London locations) all made reference to the outcome of parking surveys that indicated trips could be better made locally by active and sustainable modes. The Inspectors considered that the benefits and harm arising from the loss of car parking on surrounding streets could be addressed by way of Controlled Parking Zones and considered the residual impacts from the loss of car parking on those unable to use any means other than car (for example those with mobility issues) in the planning balance. In both cases, the loss of car parking was found to be acceptable on balance.

Places will undertake car park and user surveys before disposal and / or planning permission is sought for redevelopment of this site.

---

<sup>1</sup> Proof of Evidence of Allan Trulock, WSP, October 2021 re: Canons Park appeal ref: APP/M5450/W/21/3278646



The loss of car parking at this site would conform with national and strategic planning policies that seek the optimisation of brownfield sites for development, and would have significant public benefits in terms of encouraging walking, cycling and use of public transport, reducing congestion and improving road safety, improving air quality, maintaining inclusive access to the station and prioritising brownfield development opportunities. It would also have significant planning benefits in terms of addressing the dire need for housing in the borough and west London generally, including genuinely affordable housing, and optimising delivery.

It is an approach that has been adopted in adjoining Barnet borough for TfL car park sites, where the recently adopted [Local Plan](#) seeks provision of only essential car parking (for disabled persons or for operational reasons). For example, the proposed uses for redevelopment of the TfL High Barnet station (a terminus at the end of the Northern Line) car park site (No. 37) reads:

Residential led mixed use development with commercial uses, public realm and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons, reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.

*Q12.20 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 replacement of sufficient car parking is it clear what this would mean in practice?*

This is a matter for the Council.

## Site Allocation O22 – Stanmore Station Car Park

Statement prepared by Brendan Hodges

### Main Modifications

LBH proposes no [Main Modifications \(ref: LBH/ED9\)](#) in respect of this site allocation.

### Additional Modifications

Places notes the [Additional Modifications \(ref: LBH/ED9\)](#) (pages 29-30) but these do not address the issues set out in our Reg I9 Reps. Places does not support the continued requirement to provide car parking for the station.

We do, however, support the addition of references to transport operations and Class E uses as 'supporting land uses' as part of a mixed-use scheme.

Taken as a whole, the additional modifications do not address the issues raised in our Reg I9 representations, most of which remain relevant.

### MIQs

#### *Q12.9*

- Are the site allocations correctly drawn and are the boundaries justified?*
- What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?*
- In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?*



- *Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures?*
- *In terms of the identified uses and policy considerations, are these based on sound evidence?*

These questions are directed to the Council. However, we hope the following is helpful in respect of some of the issues raised.

The site allocation **boundary** should be redrawn to include the land potentially available for development in line with the map provided in our Reg I9 representations (page 26). This map was submitted with our original 'call for sites' submissions.

In terms of the **lead time** for delivering development on this site, please note from our Reg I9 representations (page 28) that TfL is currently considering the future of this site and may retain it for operational uses associated with the railway. Therefore, we suggest that 'transport operations' are added as an additional or alternative use and that delivery of new homes and / or transport operations may not be delivered until the 10-15 years timescale.

Given the number of new homes that could be delivered here (see below) we do not consider that there should be significant **infrastructure** requirements that would go beyond usual CIL and SI06 contributions. The scale of development would not, for eg, generate the need for a new school or healthcare facility etc. We would propose a contribution towards the provision of step-free access to Stanmore station commensurate with the quantum of development

We consider the **quantum of floorspace/ units** to be far too low to optimise the development opportunity in accordance with London Plan Policies for the reasons set out in our Reg I9 representations (pages 28-29).

In terms of the **identified uses**, we consider that the site is very suitable for higher density housing in conformity with the London Plan (particularly policies SD6, D3 and HI) if, as above, the site is not required for transport operations.

*Q12.10 Have all the concerns raised by Historic England and the Ministry of Defence been adequately addressed? The Council should set out a table confirming their response to each of the individual points raised.*

Historic England has raised no specific concerns in relation to this site.

The Ministry of Defence (MOD) safeguarding and consultation requirements set out on page 10 of their [Reg I9 representations](#) are noted and will be adhered to (albeit there is very little prospect of developing the site at 91.4m in height).

*Q12.11 Thames Water have provided detailed commentary in relation to a number of the site allocations proposed. In what way has the Council sought to engage with Thames Water in relation to the comments raised ?*

Thames Water, in their [Reg I9 response](#) (page 9) envisage no sewage (STW) infrastructure concerns. They consider that modelling may be required to understand the impact of development on the water network, and we can confirm that we will engage with Thames Water at the pre-application stage of any housing-led development.

*Q12.12 On the sites where Thames Water have identified that there are concerns regarding the capacity of the water network to accommodate the growth envisaged, are these concerns valid and should there be reflected within the policy wording as well as the IDP?*

Thames Water has not raised a concern as such but has suggested that modelling is required to better understand the impact on the water network. This can be undertaken at the pre-

application stage and we do not consider it necessary for this to be reflected in the policy wording.

*12.13 The Council have specified within CSD05 that site allocation capacities have been informed by design-led capacity studies. This is set out at EBH01 which identifies at paragraph 4.24 that where design led capacities have been used, a further 10% uplift has been applied. The justification for this is set out at appendix A. Given that the text recognises that the previous capacity approach was based on a density matrix approach, is the 10% uplift justified? Have the Council taken into account the representation made by CPR regarding tree planting and woodland creation in relation to sites HRW001 – HRW005? If not why not?*

We maintain the position expressed in our Reg 19 representations (pages 28-29) that the Council's indicative residential capacity of 183 homes would not optimise the development opportunity provided by this underused site. It does not conform with the adopted London Plan requirements of policies DI, D3 and HI to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be 'sound'.

According to the Council's [Site Selection / Allocation Methodology](#) (page 27) a 10% uplift has not been applied.

*Q12.17 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?*

The site has PTAL of 2-3 and adjoins a London Underground station. There are local bus stops on the Station Forecourt on London Road and cycle parking for interchange. In accordance with London Plan Table 10.3 (Maximum Residential Parking Standards) the maximum car parking provision would be 0.5 – 0.75 spaces per dwelling. In this case we would be likely to propose a 'car free' (or possibly 'car lite') development, given easy access to public transport and to promote the use of public transport and active, healthy travel in line with the London Plan and Mayor's Transport Strategy. As well as enabling the optimisation of housing delivery on the site, this also has significant benefits in terms of ground level public realm, amenity space and green, landscape setting.

*Q12.18 How many car parking spaces will be lost as a result of the site allocation?*

The station car park has 434 bays, including 12 disabled bays and 3 motorcycles bays. The disabled bays would be reprovided.

Please note that the Secretary of State for Transport has already consented to the disposal of the car park at Stanmore to enable the delivery of a number of affordable homes. The consent, required pursuant to [Section 163](#) of the [Greater London Authority Act 1999](#), was granted on 24 July 2019. A copy can be provided if required.

*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 note 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?*

These questions are directed to the Council. However, we hope the following is helpful in respect of some of the issues raised.

We maintain the position expressed in our Reg I9 representations (pages 27-28) that if the site is redeveloped for housing-led development, the car park will close and it is most likely that only disabled parking for station-users will be reprovided. As a minimum, the number of car parking spaces will be very significantly reduced. We consider this to be in conformity with:

- **NPPF:** for eg. para I25 which promotes and supports the development of under-utilised land and buildings for new homes and lists “*car parks, lock-ups and railway infrastructure*” specifically)
- **London Plan:** including policies: HI which sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially for the mixed-use redevelopment of car parks and sites with PTALs 3-6 or within 800 metres of a station; TI which seeks a modal shift across Outer London, with 75% of all trips being made by walking, cycling and public transport by 2041; and T6 which sets out that car-free development should be the starting point for all development proposals in places well-connected by public transport, and that the absence of local on-street parking controls should not be a barrier to new development.
- **Mayor’s Transport Strategy:** which identifies that car dependency has contributed to an increase in poor public health across London and streets that are often polluted, congested and dangerous, and unwelcoming places to walk or cycle. It provides a framework to address this and also recognises that transport is key to unlocking housing potential. It aims for a better public transport experience and promotes the improvement of the areas around stations. For example, at page I3I it provides a vision for interchange as part of “*the whole journey*” in which “*Stations and stops will be designed for active, efficient and sustainable onward journeys. The first things passengers will see on emerging from the station will be clear walking directions and maps, cycle hire facilities, bus connections and an attractive, accessible and inclusive public realm, rather than car parking and pick-up / drop-off spaces.*”

It is important to note that only a very small proportion of Stanmore station passengers use the existing car park to access the station. Stanmore station has a weekday ridership of approximately 12,000 journeys per day; with only 434 cars able to park at the station, a negligible proportion of passengers would interchange that way.

TfL undertook travel questionnaire surveys at the car park in in 2018 in connection with a scheme that would have reduced station car parking to 300 spaces (see [Transport Assessment addendum](#)). Headlines include that 17% of station car park users lived within 2km of the station; 35% of users lived within 5km (including the 17% living within 2km) and 65% of users lived over 5km from the station. The Station Travel Plan targeted all station users but focussed on identifying alternative modes for the 35% living within 5km of the site (ie. public transport, and healthy and active travel). It was noted that the 65% of users that travelled more than 5km to the car park would likely live nearer to other London Overground and mainline railway stations, which would provide an alternative route into London.



In this regard, the Inspectors for the appeals concerning residential redevelopment of TfL car park sites at Arnos Grove (ref. APP/Q5300/W/21/3276466) and Wembley Station (ref. APP/T5150/V/21/3275339) (like Canons Park, in Outer London locations) all made reference to the outcome of parking surveys that indicated trips could be better made locally by active and sustainable modes. The Inspectors considered that the benefits and harm arising from the loss of car parking on surrounding streets could be addressed by way of Controlled Parking Zones and considered the residual impacts from the loss of car parking on those unable to use any means other than car (for example those with mobility issues) in the planning balance. In both cases, the loss of car parking was found to be acceptable on balance.

Places will undertake car park and user surveys before disposal and / or planning permission is sought for redevelopment of this site.

The loss of car parking at this site would conform with national and strategic planning policies that seek the optimisation of brownfield sites for development, and would have significant public benefits in terms of encouraging walking, cycling and use of public transport, reducing congestion and improving road safety, improving air quality, maintaining inclusive access to the station and prioritising brownfield development opportunities. It would also have significant planning benefits in terms of addressing the dire need for housing in the borough and west London generally, including genuinely affordable housing, and optimising delivery.

It is an approach that has been adopted in adjoining Barnet borough for TfL car park sites, where the recently adopted [Local Plan](#) seeks provision of only essential car parking (for disabled persons or for operational reasons). For example, the proposed uses for redevelopment of the TfL High Barnet station (a terminus at the end of the Northern Line) car park site (No. 37) reads:

Residential led mixed use development with commercial uses, public realm and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons, reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.

*Q12.20 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 replacement of sufficient car parking is it clear what this would mean in practice?*

This is a matter for the Council.



# Matter 7: Design and the Historic Environment

## Issue 13 : Is the approach to Design and the Historic Environment contained within the Plan justified, positively prepared, consistent with national policy and in general conformity with the London Plan?

### Policy GR4 Building Heights

Statement prepared by Andrew Russell

#### Main Modifications

LBH proposes no [Main Modifications \(ref: LBH/ED9\)](#) in respect of this policy.

#### Additional Modifications

We support the proposed additional modification which amends the key on the map to refer to “appropriate” heights, rather than “maximum” heights.

Taken as a whole, the additional modifications do not go far enough to address the issues raised in our Reg I9 representations, most of which remain relevant.

#### MIQs

*13.11 Does policy GR4 which addresses tall buildings align with the steps identified within the London Plan at page 142 / 143?*

Yes.

London Plan Policy D9 requires boroughs to define what is considered to be a tall building and identify locations where tall buildings may be an appropriate form of development. These locations should be identified on maps in the Local Plan, with appropriate heights shown on the maps. This process should be informed by an understanding of local context and capacity for growth and site sieving exercise to consider potential opportunities and constraints (London Plan para 3.9.2). In our view, the key components of the London Plan Policy D9 have been followed.

In our representations at Reg I9 stage, we requested that “maximum heights” on the map is removed as London Plan Policy D9 Part B states “appropriate heights”. This is an important clarification, in accordance with the London Plan and is welcomed. This ensures a necessary and appropriate degree of flexibility given the level of detail and site and scheme specific evidence available at this stage in the plan making process.

Maximum height on each site and the precise massing and layout will be established via a rigorous design-led masterplanning approach to optimise the development capacity, in line with the London Plan. This process will include design review, pre-application engagement and would need to take into account particular site opportunities and constraints in terms of heritage, townscape and the policy considerations set out in the Development Plan, specifically the qualitative assessment criteria in London Plan Policy D9, which requires consideration of the

visual, environmental, functional and cumulative impacts and, importantly, the quality of architecture and materials proposed.

Hence, it is our strong view that maximum heights should not be prescribed in the Local Plan.

*13.12 What is the purpose of the designated tall buildings zones map on page 57 of the Plan and the associated text? Does this replicate what is contained on the policies map?*

The purpose of the map is to identify Tall Building Zones and appropriate heights, as required by London Plan Policy D9. This is considered to provide very beneficial clarity to users, which should be a focus and key purpose of the Local Plan.

*13.13 The map purports to identify the areas appropriate for tall buildings. However, the text which accompanies the map indicates some but, not all, buildings could be tall in these areas. It goes on to state that only a minority should reach the maximum appropriate height. Please could the Council explain the rationale behind this text and how it relates to policy D9 of the London Plan which seeks to ensure that Boroughs identify appropriate locations for tall buildings.*

There should be an appropriate degree of flexibility in our view as the permissible height, layout and massing arrangement on any given site will be determined at **decision-making stage**, following a detailed and rigorous pre-application and design review process, taking into account the range of contextual, design and policy considerations, eg heritage, townscape, daylight / sunlight and overshadowing and other environmental and functional factors. It would not be appropriate to set maximum height for the entire broad area within a Tall Building Zone, given the range of complex, site-specific considerations which would need to be grappled with by any individual planning application.

In our view, the identified Tall Building Zone heights and supporting text should provide an appropriate degree of flexibility and should not be applied in a prescriptive manner. Each planning application would need to be determined on a case-by-case basis.

*13.14 Is it clear how a decision maker should react to the designations proposed and the policy wording?*

We consider that the following revision is necessary, in line with the comments above:

*Proposals shall **generally** not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.*

The appropriate height on any site should be established at the planning application decision making stage, following detailed pre-application, design review and qualitative assessment and engagement processes, based on more detailed site and scheme specific circumstances and evidence. This would include detailed assessment of townscape views, heritage assets, and daylight and sunlight considerations, ensuring that the development capacity of the site is optimised in line with the design-led approach in the London Plan.

## Appendix I: Canons Park Station Car Park

# Places for London - Canons Park Station Car Park

Date: April 2024  
Author: Transport for London

