

Harrow Local Plan Examination in Public Transport for London (Spatial Planning) – Matter 9 Written Statement

Strategic Policy 10: Movement

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

1. The London Plan requires that development plans and proposals contribute towards the Mayor's strategic target for 80 per cent of all journeys to be made by walking, cycling and public transport by 2041 (London Plan Policy T1) and in order to do this, that development plans clearly support making best use of land, supporting the delivery of new and improved active, efficient and sustainable transport infrastructure and the Healthy Streets Approach, provide sufficient cycle parking and restrain car parking in line with London Plan standards.
2. The Plan has sufficient hooks in Policy GR11, including in the amended in Part A of the policy as shown in the TfL/LBH Statement of Common Ground (SoCG) (ref: LBH/ED14, p.7) and Proposed Modifications (ref: LBH/ED9, p.9), to ensure that the transport impacts of development proposals can be mitigated and support a shift towards sustainable modes as set out in London Plan Policy T1 and Policy M1 of the draft Plan. We welcome that LBH has agreed our proposed modification to Para. 2.11.4, however following conversations with the Council on our SoCG, we now believe the supporting text, as shown in the Proposed Modifications (ref. LBH/ED9) should be further modified for consistency with the modified Part A of the Policy. The relevant part should therefore now read, 'Where considered a requirement a S.106 obligation may be secured for transport improvements. This may include infrastructure such as improvements to public and active transport including stations as well as to junctions/roads. This could include obligations to mitigate impacts to ensure the ongoing function of the bus network' (ref: LBH/ED14, p.8).
3. While Part A of Strategic Policy 10 requires that development proposals contribute towards improvements to active, efficient and sustainable

transport networks, we believe that the policy could be made more effective by clearly identifying what schemes development proposals should contribute towards delivering over the course of the Plan period. This has been largely addressed through a proposed modification to Para. 10.0.5 in our SoCG (ref: LBH/EDI4, pp.12-13) which sets out that the Council will seek to set out spatially the planned and proposed improvements to the transport network within the Investment Delivery Plan (IDP). We would strongly encourage this to be done at the earliest opportunity to ensure the effectiveness of the policy and to be in line with London Plan Policies T1 A(2), T3 B(2) and T5 A(l) and the Sustainable Transport, Walking and Cycling London Plan Guidance (LPG).

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

4. Yes, parts A, B and E of the Policy are clear and unambiguous. As drafted, car-oriented developments should not be supported by decision makers, which is welcomed and in line with London Plan Policies GG2, H1, H2, T1, T2 and T6. However, it is essential that all site allocations comply with London Plan car parking standards, otherwise the Plan will not be internally consistent nor compliant with the London Plan.
5. We have provided further comments in our written statement on Matter 6.

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

6. Yes, it is justified to apply part A of the policy to minor and major applications, and no, it should not apply only to major applications. While it may not be relevant to certain householder applications, the impact of small sites applications in aggregate or at particularly sensitive locations may be such that improvements to transport infrastructure are necessary. It is up to the decision maker to determine the impacts of development and whether facilitating improvements to transport infrastructure is commensurate with the scale of development.
7. As an example, some minor applications, such as those for crossovers from the highway to access a site by car or for servicing, can create a detrimental

impact for road safety and it is essential that they are designed in a way which does not worsen safety.

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

8. Strategic Policy I0 and Policies M1 and M2 of the draft Plan as amended and subject to our response to Questions 15.11 and 15.12 below will secure a shift away from car use. However, as stated in our response to Question 15.2, unless site allocations are in line with London Plan Policy T6-T6.5, then there is a risk that this objective will be undermined. Additionally, as set out in our written statement on Matter 6, all station car park site allocations are well-connected and therefore car-free should be the starting point for development and re-provision of station car parking is not appropriate in these locations as the vast majority of station car park users are able to access the rail network by other means.
9. We do note, however, that the strategic objective is framed as supporting modal shift away from fossil fuel car use. This should however be reframed to support modal shift away from car use regardless of the type of fuel. This is because electric vehicles share most of the negative externalities associated with fossil fuel car use, such as congestion, road danger, exacerbating health inequalities and contributing to poorer quality of life for many. However, we do recognise the importance of the transition to electric vehicles for car trips that do remain.

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

10. The London Plan is clear that all development plans must seek to support modal shift away from car use and towards active, efficient and sustainable modes as set out in London Plan Policy T1. This is not limited to journeys by fossil fuel cars, but all cars.
11. Part C of London Plan Policy T1 requires that, where car parking spaces are provided in residential developments, that at least 20 per cent have active charging facilities and all remaining spaces have active charging facilities. We note that Requirement S1 of the Building Regulations 2010 now set a higher requirement for electric vehicle charging points (EVCs), however

this does not therefore mean that developments must provide car parking and the overarching principle of car parking restraint remains central to ensuring that developments do not have a severe negative impact on the road network, including the national Strategic Road Network (SRN) and Transport for London Road Network (TLRN). This approach is also more effective in reducing emissions than a transition to a same-sized electric vehicle fleet (or larger given a higher resident population in London as the city grows and the potential creation of additional parking spaces rather than fewer).

12. Similarly, Part E of London Plan Policy T6.3 requires that where car parking is provided at retail developments, rapid EVCPs should be provided. However, this again does not mean that a quantum of car parking which is not compliant with London Plan Policy T6.3 should be provided, and it remains the case that all developments which are or can be made well-connected by public transport should be car-free as set out in Part B of London Plan Policy T6.
13. In order to clarify the transport strategic objective and ensure that it is effective and in line with London Plan objectives, we would suggest the following modification: 'The council will facilitate modal shift away from ~~fossil fuel~~ car use.'

Policy MI Sustainable Transport

15.6) With reference to the representations from TfL could the Council identify on an annotated map the existing and proposed walking, cycling and public transport improvements referred to as part B of policy MI and paragraph 10.1.4 of the supporting text?

14. We have agreed with the Council through our SoCG (ref: LBH/EDI4, pp.12-13) that such a map should be provided, however that it can be provided through an amended IDP. This should be provided at the earliest possible time to ensure the effectiveness of the policy.

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

15. Part A of the policy is justified as it is essential that the Plan is vision-led, as required by para. 109 of the NPPF which states that 'Transport issues should be considered from the earliest stages of plan-making, using a vision-led approach to identify transport solutions that deliver well-designed,

sustainable and popular places.’ Policy T2 of the London Plan also requires that development plans take a Healthy Streets Approach and enable Londoners to travel by sustainable modes, which Part A of the policy sets out to do. Additionally, notwithstanding our comments below, Part A of the Policy is sufficiently clear in its purpose and intention.

16. We do not believe that the Council needs to define ‘sustainable neighbourhood’ in the glossary of the Plan. Such concepts have the potential to evolve rather than having fixed and clearly defined requirements and can often be context-specific. However, the use of the phrase in the Policy, alongside the requirements of development proposals set out in Part A of the Policy are useful in conceptualising what the Council aims to achieve and the term aids in the effectiveness of the Policy. It makes clear that the Policy is aiming for a holistic approach as opposed to a series of discreet requirements. We support this.
17. As set out above and in our Regulation 19 comments, the effectiveness of the policy would be aided by crystalising what that vision looks like spatially and how development proposals across the borough can contribute towards that vision. This would allow the plan to meet the requirement of paragraph 109(e) of the NPPF which states that development plans should identify and pursue ‘opportunities to promote walking, cycling and public transport use’ and the Sustainable Transport, Walking and Cycling LPG (adopted November 2022) clearly sets out ways by which the Council can achieve this.
18. Para. 10.1.4 sets out some of the Council’s infrastructure plans, however this is limited to planned active travel infrastructure and the Highway Infrastructure and Asset Management Programme. As part of meeting the requirements of the LPG and London Plan Policies T1 A(2), T3 B(2) and T5 A(I), we also ask Councils to consider their aspirational improvements to public transport, walking and cycling infrastructure. For example, in Part A(d), there is a requirement for development proposals to ‘support the delivery of strategic or local cycle networks in or through the borough.’ While this does broadly suffice on its own, the effectiveness of this part of the Policy is limited by decision-makers and applicants not necessarily knowing the wider potential and ambition for the Council’s cycleway network.

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

19. We are not clear what the Inspector is referring to as part C of the Policy. If they are referring to Part A(c) of the policy, then it is indeed clear, justified and consistent with London Plan Policy T2 Healthy Streets which encourages development plans and proposals to reduce severance and

increase permeability of sites by people walking, cycling and, where appropriate, for the public transport network as well.

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

20. The Council has noted our concerns and expressed that there are no safeguarding requirements at this time. We accept that there are a number of key transport improvements set out in paragraph 10.1.4 of the Plan and there is not any specific infrastructure which requires identified land. The Policy also has sufficient hooks to aid permeability through sites.
21. However, as stated above, the Policy could be made more effective through showing spatially where planned and aspirational improvements to the walking, cycling and public transport networks (eg bus priority infrastructure) would go. This aids effectiveness by indicating where, for example, a cycleway may need to go through a site, therefore allowing applicants and decision-makers to know when and where provision should be made in development proposals. As stated above, while the Policy would be more effective with this being integrated into the Plan, we have agreed with the Council that this can be provided through the IDP (ref: LBH/EDI4, pp.12-13).

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

22. This appears to be a gap in the Policy. We would encourage an additional modification to the Policy which states, 'Where appropriate, development proposals should seek to provide improved bus infrastructure, including but not limited to bus stops, bus standing facilities and driver welfare facilities, improved access to existing public transport infrastructure and contribute to step-free access at rail and Underground stations. Development proposals which improve access to public transport will be supported.'

Policy M2 Parking

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

23. Although we agreed with the Council that no modification was required in our SoCG (ref: LBH/EDI4, p.14), we would still support the following text of

para. 10.2.2 being incorporated within the policy: ‘Car free developments should be the starting point in areas that are well-connected to public transport (PTAL 4-6).’ It would aid in the effectiveness of the Policy and compliance with London Plan Policy T6 as Part B of London Plan Policy T6 could be argued to not form part of the car parking standards, and while the London Plan forms part of the development plan for all of London, it is crucial that development plans are consistent in following the approach set out by the London Plan to avoid decisions being taken which are counter to this essential policy in the London Plan.

24. While we support such an amendment, it should also be noted that the policy should allow for sites with a lower PTAL to be car free. This is due to the fact that while PTAL is an excellent metric for measuring access to the public transport network, it does not measure access through the public transport network to reach destinations. It is perfectly reasonable that at some sites, such as station car parks which are by their very nature well-connected, could have a lower PTAL. This is the case at Stanmore and Canons Park station car parks which have access to frequent Jubilee line services to Wembley Park and central London, as well as regular bus services serving the surrounding nearby town centres with a journey time of approximately ten minutes. Crucially, tables 10.3-10.5 of the London Plan represent a maximum and not a target.

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

25. We have agreed with the Council that part B of the policy will be deleted as it was neither effective nor in line with the London Plan. There is sufficient provision for operational requirements already set out in London Plan Policies T6-6.4 and London Plan Policy T7.
26. The Council currently proposes that the current part H of the Policy be moved up to form a new part B. We do not object to the moving of the Part H, however we have concerns about the effectiveness of the policy as currently drafted and its implications for complying with London Plan car parking standards. As noted in our SoCG (ref: LBH/ED14, p.4), we have agreed to continue engaging on a mutually agreeable proposed modification, however our comments below are in the context of the extant part H and Proposed Modifications to part H (ref: LBH/ED9, p.17).
27. Reducing car parking in well-connected locations will encourage mode shift, consistent with the Mayor’s mode shift targets and is an essential element of encouraging sustainable travel, consistent with Strategic Policy 10.
28. Town centres and public transport hubs are, by definition, locations that provide greater access by sustainable modes. Bus services converge in town

centres and competition for space on the roads is greater. The availability of parking in these locations results in car journeys that would be practical to make by sustainable modes. When parking is removed or rationalised, other modes become more attractive, particularly because less car use results in less congestion, improved safety, more viable public transport and a more attractive environment for walking and cycling. Less congestion also makes journeys by car for those who need them faster or more reliable. Also, space is freed up to provide higher quality public realm. Redevelopment of car parking, particularly for high-quality residential and mixed-use developments, increases the number of people within town centre/transport hub catchments, thus increasing vitality sustainably.

29. Part C(2) of London Plan Policy SD7 encourages boroughs to recognise the capacity of car parks for housing intensification and mixed-use redevelopment. This is expanded upon in Policy HI which identifies well-connected sites, car parks, low-density retail parks and supermarkets sustainable sources of housing capacity which should be prioritised by development plans. According to recent evidence from DfT, redeveloping town centre parking is suggested as a way to deliver mode shift in practice.¹
30. Policy T6 A states that: 'Car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity.' Car parks in town centres and at transport hubs will generally be well-connected and offer a wide choice of alternatives; therefore, it is appropriate to reduce parking in these locations where there is often a legacy of over-provision.
31. The Sustainable Transport, Walking and Cycling London Plan Guidance states in the section on 'Car parks and other surplus transport land' that Development Plans should identify opportunities arising out of declining car use to redevelop land, including car parks, which could be used more efficiently and support sustainable mode shift.
32. Paragraph 570 of the Inspectors' report on the draft London Plan Examination in Public (2019)² states, '*The Plan sets out maximum car parking standards for office, retail, hotel and leisure developments, as well as minimum requirements for disabled persons spaces for those and other*

¹ 'Impact of interventions encouraging a switch from cars to more sustainable modes of transport: a rapid evidence assessment (REA)' (<https://www.gov.uk/government/publications/switching-to-sustainable-transport-a-rapid-evidence-assessment>) states, 'Reducing car use by reducing parking availability or introducing city centre access restrictions, for example, is effective but works best when public or active transport alternatives are put in place first.'

² https://www.london.gov.uk/sites/default/files/inspectors_report_and_recommendations_2019_final.pdf

commercial uses and social infrastructure. The maximum standards relate to main town centre uses, and are intended to be restrictive in order to influence people's choice of travel. That is a justified approach in principle given the direct relationship between the availability of destination parking and travel choice, and the accessibility of most town centres in London.'

This makes clear that the approach set out in the London Plan is appropriate across London, including in Harrow. Harrow's town centres also benefit from access to the London Underground and bus network which is better than many other parts of outer London, where the approach taken in the London Plan has been supported by inspectors during the relevant local plan examinations in public.

33. The inspectors go on to say, *'There is no substantive evidence to indicate that any of the maximum standards would lead to highway safety problems, undermine viability, or result in developments that would be inaccessible.'* The Council has not provided any evidence that removing town centre car parking would impact on viability of the centre, and therefore any references to town centre viability, vibrancy and vitality in relation to car parking should be deleted from the Policy. This is especially true because there is some evidence to the contrary—that people arriving in town centres and on high streets by sustainable modes spend more in them than do those who arrive by car.
34. We do not support the proposed modification to Part H of the Policy (ref: LBH/ED9, p.17) with regards to its setting an expectation that some sites will still need to provide car parking, not least based on their catchment – this is unevidenced. Harrow town centre has a very large catchment by public transport. Other outer London boroughs also have large catchments for their Metropolitan town centres and fully comply with London Plan policy.
35. While London Plan Policy T6 L requires that developments follow the approach set out in the current London Plan rather than re-providing car parking that is currently there, we understand that there can be a certain tension when all or nearly all public car parks are site allocations. However, the overriding principle that new development is provided on the basis of the current approach is in policy. Town centres are by their nature the most well-connected places in London as they are often centred around rail stations with the bus network focused in these locations as well as the fact that shops and services in these locations provide residents what they need locally. Further, in these constrained locations we need to make effective, efficient use of land. This is at the heart of a brownfield first approach.
36. If the Inspector were to recommend that a 'strategy-based approach be taken', it is essential that it aligns with the principles and policies set out in the London Plan and should effectively set out the managed reduction over

time in public car parking as those sites come forward for development with a clear path to compliance within the plan period. Any such strategy should set a path for further restricting car parking over time across the town centre, and the sites which are the most well-connected by sustainable modes should be the highest priority for being car-free with no re-provision of public car parking. Any re-provided car parking should be able to be converted to productive uses and the Policy would need to require planning conditions to this effect.