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Re: Consultation on Harrow local plan main modifications

Thank you for giving Transport for London (TfL) the opportunity to comment on the Harrow Main Modifications consultation.

Please note that these comments represent the views of TfL officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Our comments on the modifications are included in the appendix to this letter.

[REDACTED]
Josephine Vos
London Plan and Planning Obligations Manager
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Appendix A: Detailed comments and suggestions for amendments

Ref	Policy	Comments
MM2	Strategic Objectives, pp23-25	<p>I.I.I8 – We do not support the reference 'fossil fuel vehicles'. All vehicles contribute to poor air quality, particularly particulate pollution. Additionally, the strategic objective refers to car parking standards, which aim to reduce journeys by cars generally, not just by those with internal combustion engines.</p> <p>Electric vehicle charging infrastructure provides the infrastructure for the remaining necessary vehicles, following the 'avoid, shift, improve' model.</p> <p>Therefore, we recommend the following amendment: 'Managed parking standards in new developments will support a reduction in car journeys, while and improvements to electric vehicle charging infrastructure will further support the decarbonisation of remaining a reduction in journeys carried out by fossil fuel vehicles.</p>
MM5	Policy SP01 up to para 2.0.10 pp 30-33	We welcome the proposed modification.
MM10	Policy GR4A up to 2.4.19	<p>As requested in the SoCG and our Regulation 19 representations, part Ak should remove the reference to front garden parking. Any references to parking in front gardens is not aligned with the Council's policies on climate change, including reducing flood risk from surface flooding.</p> <p>k. Continue to provide for appropriate landscaping and parking provision within the front garden</p>
MM16	Policy GRII up to para 2.II.4 pp 80-81	We welcome the proposed modifications to part A of the policy and para. 2.II.4.
MM21	Policy HO2, pp I08-I10, up to para 4.2.3	We welcome the proposed modification to part 2i of the policy.
MM22	Policy HO3 pp I13-I17	We welcome the proposed modifications to part I and part 2d (formerly part 3d) of the policy.
MM24	Policy HO5, pp I26-I31, up to para 4.5.I3	We welcome the proposed deletion of part IK of the policy.
MM28	Policy HO10, pp I57-I61, up to para 4.I0.9	We welcome the deletion of part II of the policy.

MM32	Policy SP05, pp 177-180, up to para 5.0.28	We welcome the proposed modification to part D.e of the policy.
MM34	Policy LE2, pp 191-192, policy only	<p>We do not support the proposed deletion of part D of the policy. Additionally, we would recommend additional text in the policy so that it reads: 'All new proposed night-time activities must seek to ensure all residents are able to participate in <u>and travel safely to</u> nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community.' While the Healthy Streets Approach, adopted in Policy M1 of the draft plan and set out in Policy T2 of the London Plan, sets out that 'safe and secure' is one the ten Healthy Streets Indicators, safety and inclusion and the perception of safety at night are particularly critical for the nighttime economy and therefore part D of the policy aids in the effectiveness of policy M1 of the draft plan and policy T2 of the London Plan.</p>
MM53	Policy SPI0, up to para 10.0.5, pp 271-274	<p>Part A – We support the proposed modifications, and agree that moving the 'mitigation' component of the policy to the new part C improves clarity.</p> <p>Part B & part C (new) – We support the proposed modifications as they improve clarity and effectiveness of the policy.</p> <p>Part C (deleted) – While we acknowledge that there is repetition in the policy, there is value in retaining the explicit reference to providing step-free access at stations. This should either be retained within the text of Policy SPI0 in the appropriate location, eg part A of the policy, or in the supporting text.</p> <p>Part E & H – We welcome the proposed modification, particularly the explicit reference to day and night-time travel. We also support the separate policy provision for the Mayor's Vision Zero objective.</p> <p>Para 10.0.2 – We support the addition of the London Plan definition of active travel to the supporting text.</p> <p>Para 10.0.5 – We support the additional clarification of how projects will be funded through planning obligations and that transport improvements will be set out spatially through the Investment Delivery Plan.</p>

MM54	Policy MI, pp 276-279	<p>Part A – We support the proposed modifications to part A of the policy which substantially improve the overall clarity of the policy. We would also suggest that part A.h (now part A.e) of the policy be moved to Part A of Policy M2, in the same manner that part A.f (deleted) has been moved to Part A of Policy M2.</p> <p>Part B – We support the proposed modifications, which will aid in the effectiveness of the policy, particularly by making clear that Travel Plans will be secured by condition or SI06 obligation.</p> <p>Part C – We strongly support the addition of Part C to the policy. The key component of the proposed modification which is missing is connectivity by public transport. While frequency and quality are components of connectivity, journey times to destinations which people want to visit are also critical and serve a key role in enabling and bringing forward sustainable development. Additionally, London Plan car parking standards and Good Growth objectives are linked whether places are or can be made well-connected by public transport, alongside walking and cycling. We recommend the following addition to Part Cb of the policy: ‘improvements to public transport corridors, in particular bus routes, <u>which to</u> provide improved <u>connectivity and</u> improved bus infrastructure, both on-route as well as other infrastructure supporting bus operations’.</p> <p>We would support the reference to connectivity improvements being placed in part Ca of the policy, although the split between assets and corridors is useful. Another potential split is between public transport corridors and bus infrastructure.</p> <p>We welcome in part Cc the support for fully accessible step free stations. However, by deleting the Spatial Strategy (MM4), the specific references to where step free will be prioritised has disappeared. Given that without adequate funding sources, achieving step free at all stations is not possible, the reference to specific stations is needed to enable us to secure funding for specific schemes through planning. This should be included in this part Cc. Harrow & Wealdstone station was previously mentioned specifically in the Spatial Strategy and</p>
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		<p>currently does not appear anywhere, including in site allocations.</p> <p>Para 2.0.12 – The proposed text should be modified to read: ‘Accessibility to public transport... There is a need to continue to upgrade public transport infrastructure in the borough to <u>improve connectivity</u> and facilitate the needs of the growing population..’ in order to clarify the intention of the supporting text. Access refers to being able to reach and use the public transport network. Accessibility refers to whether people of all ages and abilities can use the public transport network. Connectivity refers to how quickly and reliably people are able to reach the destinations they want to travel to.</p>
MM55	Policy M2, pp 281-284	<p>Part A – We support the proposed modifications to part A of the policy, particularly the removal of ‘maximum’ from part Aa of the policy to make clear that London Plan car parking standards are not a target, but rather are an upper limit. We also support the addition of parts Ad-e in line with MM54, and also recommend an additional part Af in line with our comments on Part A of Policy M1 (MM54).</p> <p>Part B (deleted) – We support the deletion of part B of the policy, in line with our Statement of Common Ground with the Council and our representation to the Regulation 19 consultation.</p> <p>Part B (new) – We maintain our position in the comments made in our representation to the Regulation 19 consultation (ID: 205) and our written statement on Matter 9 of the EIP (ID: 205). As currently drafted, the policy is neither evidence-based nor effective. There is no evidence which sets out clearly how car parking provision can be linked to town centre viability and vitality, and rather there is evidence to the contrary as previously noted. It is also not effective insofar as it is not clear how it will lead towards a reduction in car parking over time with the ultimate result of all sites redeveloped being car-free as is required by London Plan policy T6.</p> <p>The policy as drafted also does not clearly align with national policy in being vision-led. The link to national policy on town centre viability is unclear given the lack of evidence. It also does not align with London Plan Policy. It does not align with the</p>

	<p>requirement for development plans and development proposals to support the 80 per cent of all journeys to be made by active, efficient and sustainable modes (T1), promoting Healthy Streets and Vision Zero (T2), restricting car parking in line with the current approach (T6 L). It further does not align with London Plan policies on making best use of land (GG2) and prioritising car parks and low-density sites for redevelopment (H1).</p> <p>It is unclear how the policy would be effective in its implementation, except as a means of retaining car parking where not appropriate. At the very least, the policy must be clear in how it will achieve an outcome which is consistent with London Plan policy.</p> <p>Finally, the justification provided for the policy does not apply to TfL station car parks, which do not exist to serve town centres.</p> <p>Given the above, part B of policy M2 should be modified as follows:</p> <p><i>'Sites which serve wide catchments in Harrow may need to continue to provide public car parking. On sites with existing public car parking in the Metropolitan and District Centres, or at strategic public transport, culture or leisure nodes, any loss should be managed, based on an agreed local parking strategy. Any proposed rerevision of car parking in well-connected locations should be time-limited, secured by condition, with a clear strategy for future productive use set out in the parking design and management plan. reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre or locality, and should not adversely impact upon town centre vitality and viability. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.'</i></p> <p>At an absolute minimum, part B should be modified to read: '... On sites with existing public car parking in Metropolitan and District Centres, or at strategic public transport, culture or leisure nodes...'</p> <p>Part E – We have no objections to the proposed modification.</p>
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		<p>Para I0.2.2 – The proposed modification ‘Notwithstanding part B of the policy’, highlights the internal inconsistency of the policy and the necessity of further modifications to part B of the policy to ensure that Policy M2 as a whole is effective.</p> <p>Para I0.2.9 – There is no evidence to make the claim that ‘public parking plays an important role in underpinning the vitality and viability of town centres,’ nor for the other claims which are made in the remainder of the proposed modification. The supporting text does not provide sound justification to the policy and is not vision-led. See also our representations to the Regulation I9 consultation and Matter 9 of the EIP.</p> <p>Therefore, the following text should be deleted:</p> <p>‘Public parking plays an important role in underpinning the vitality and viability of town centres, enabling a choice of modes, representing the wide range of goods and services visited within them. Public parking enables visitation from areas that are not well connected by public transport, and enable families to conveniently travel together, as well as facilitating the collection of bulky goods. This extends to other strategic assets, including leisure and cultural facilities that serve a sub-regional catchment, and parking at transport nodes that underpin mixed mode travel within north London, and actively reduce congestion.’</p>
MM56	Policy M3, up to para I0.3.5, pp 284-285	We welcome the proposed modifications to the policy, particularly as it makes clear the use of cargo bikes and zero emission vehicles for last mile deliveries is supported and encouraged.
MM59	Paras II.20-II.21 & List of Sites Table, pp 291-293	OAI Car park Ellen Webb Drive – Car parking reprovision should be removed from the list of non-residential land uses, as it was agreed with the Council through our SoCG that development will be car-free except for disabled persons’ parking or operational requirements, in line with London Plan policy T6, and this change has been made in MM72.
MM62	Site OAI, pp 295-296	We welcome the proposed modifications which make clear that redevelopment on the site should be car-free, in line with Policy M2 of the draft plan and London Plan Policy T6.

MM63	Site OA2, pp 297-299	We welcome the proposed modifications which secure the future transport requirements of Harrow-on-the-Hill Underground and bus stations.
MM67	Site OA6, pp 308-210	We welcome the proposed modifications which make clear that redevelopment on the site should be car-free, in line with Policy M2 of the draft plan and London Plan Policy T6.
MM68	Site OA7, pp 311-312	Given the highest PTAL measured on the site is PTAL 5, the site allocation should make clear that car-free development is expected to be in line with Policy M2 of the draft plan and London Plan Policy T6.
MM72	Site OA11, pp 320-321	We welcome the proposed modifications which make clear that redevelopment on the site should be car-free, in line with Policy M2 of the draft plan and London Plan Policy T6.
MM73	Site OA12, pp 322-323	We welcome the proposed modifications which make clear that redevelopment on the site should be car-free, in line with Policy M2 of the draft plan and London Plan Policy T6.
MM79	Site GB1, pp 336-337	We welcome the proposed modification which makes clear that there are transport infrastructure and service requirements to make the site sustainable.
MM81	Site O1, pp 340-341	We welcome the proposed modification, which improve clarity and effectiveness of the policy.
MM83	Site O3, pp 344-345	We welcome the proposed modifications which remove the expectation of car parking reprovision, given the site's high PTAL.
MM87	Site O7, pp 353-355	We strongly welcome the proposed modifications, which remove the requirement for reprovision of car parking at the station, given the site is well-connected by nature and benefits from a PTAL of 4-5, while also clarifying that disabled persons' parking should be reprovided. We also welcome the requirement for development proposals to contribute towards step-free access at the station.
MM92	Site O12, pp 364-365	We welcome the proposed modification which makes clear that car parking provision should be in line with London Plan standards, which are maximums, rather than targets. This will aid in the overall effectiveness of Policy M2 of the draft plan. The text of the modification has a minor spelling error: 'carparking' should have a space added to read as 'car parking'.
MM100	Site O20, pp 381-382	We do not support the proposed modifications as they currently stand. Notwithstanding our comments above on draft Policy M2B, the requirement for public car parking to be reprovided

		<p>on the site does not have regard for the overall connectivity of the area given the relative density of stations and the bus network which connects to the surrounding area and town centres. It is more effective to provide additional homes on the site where residents can live car-free or car-lite lifestyles than to cater for people driving to the station when they have sustainable transport options already available, as borne out by survey results which are detailed in our written statement on Matter 9 of the examination.</p> <p>The following modifications should be made to the site allocation.</p> <p><i>Allocated use</i></p> <p>Public car Disabled persons' parking to support multi-modal travel</p> <p><i>Development principles</i></p> <p>'The site is suitable for partial residential development with retention of an appropriate amount of public station disabled persons' car parking to support multi-modal travel on the Jubilee line ...'</p>
MMI01	Site O21, pp 383-384	<p>We are concerned that the proposed modifications agreed with the Council in our SoCG have not been carried through into the main modifications. We agreed the removal of the expectation for car parking provision on the site. Proposals should be car-free or car-lite in line with Policy M2 of the draft plan and London Plan policy T6.</p>
MI02	Site O22, pp 385-386	<p>We do not support the proposed modifications as they currently stand. Notwithstanding our comments above on draft Policy M2B, the requirement for public car parking to be reprovided on the site does not have regard for the overall connectivity of the area given the relative density of stations and the bus network which connects to the surrounding area and town centres. It is more effective to provide additional homes on the site where residents can live car-free or car-lite lifestyles than to cater for people driving to the station when they have sustainable transport options already available, as borne out by survey results which are detailed in our written statement on Matter 9 of the examination.</p>

		<p>Additionally, using evidence of car parking demand does not accord with a vision-led approach and is instead a predict and provide approach which is unjustified. It is also not in line with the evidence requirements of draft Policy M2, nor of London Plan policies T4 or T6. This requirement is wholly out of alignment with the remainder of the draft Plan.</p> <p>The following modifications should be made to the site allocation.</p> <p><i>Allocated use</i></p> <p>Public car Disabled persons' parking</p> <p><i>Development principles</i></p> <p>'The site is suitable for partial residential development with retention of an appropriate amount of public station disabled persons' car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere ...'</p>
AM82-87	Para I0.0.4, I0.2.2, I0.2.6, I0.2.10, I0.3.4, I0.3.5	The proposed additional modifications are noted.