

Date: 19 December 2025
Our ref: TfL/Places/VSH/BH – LBH Plan Main Mods
Your ref: –

New Local Plan,
Planning Policy Team,
London Borough of Harrow,
Forward Drive,
Harrow, HA3 8FL

By email: Local.Plan@Harrow.gov.uk

Dear Sir / Madam,

**NEW HARROW LOCAL PLAN 2021 – 2041
PROPOSED MAIN MODIFICATIONS, ADDITIONAL MODIFICATIONS AND AMENDMENTS TO
POLICIES MAP
REPRESENTATIONS BY PLACES FOR LONDON**

Places for London ('Places') is pleased to provide its views on the Council's proposed Main Modifications, Additional Modifications and amendments to the policies map, which follow this Summer's Examination in Public (EiP). Please note that the views expressed in this letter are those of Places in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Places for London

Places is TfL's property company, managing space for over 1,500 businesses in TfL stations and railway arches, and on London's high streets, as well as developing TfL's surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations. We are a significant landowner in the borough including the following sites with development potential:

- Rayners Lane station car park
- Canons Park station car park
- Stanmore station car park
- Land adjoining Harrow on the Hill station

We have previously commented on the Regulation 18 and 19 versions of the draft Plan, promoted the above sites for allocation via your 'call for sites' and appeared at the Examination in Public in June.

Statement of Common Ground (ref: ED28)

Places entered into a Statement of Common Ground (SoCG) with the Council in August 2025, following the EiP. It sets out the respective planning policy position between the parties in relation to the allocations of the Rayners Lane Station car park, Canons Park Station car park and Stanmore Station car park.

Places for London's Representations

As we have a relatively large number of representations across the policies and site allocations (SA), we have not used your template representations form. However, we have used your headings where it is relevant to do so.

Part A – Personal Details

These are all provided in this letter.

Part B – Representations

Please see below.

Part C – Equality Monitoring Questions

These representations are submitted on behalf of Places and not an individual. We strive to reflect, represent and meet the needs of London's diversity, and it would not be appropriate or accurate to complete this part of the form as an organisation.

Our representations are as follows.

Main Modifications (ref: ED30)

MM5 Strategic Policy 01: High Quality Growth

We support confirmation that site allocations are expressed as minimum capacities.

MM9 Policy GR4 Tall Buildings

We maintain our Regulation 19 representations (EiP doc ref: 206, pages 4 - 6).

MMII Policy GR5 View Management

We maintain our Regulation 19 representations (EiP doc ref: 206, pages 7 - 8).

We support the substitution of "maximised" in paragraph G with "secured".

MMI8 Policy HEI Historic Environment

We maintain our Regulation 19 representations (EiP doc ref: 206, pages 9 -II).

MM55 Policy M2 Parking

We do not support new paragraph B which seeks to provide support for retaining public car parking. In our view, the onus should be on prioritising the use of public transport and active travel, walking and cycling, and reducing congestion and improving air quality and road safety. This part of the policy does not conform with London Plan policies for reducing car dominance and for 80% of all trips in London to be made by foot, cycle or public transport by 2041 (T1 and T2), promoting healthy streets (T2) and restricting car parking in line with levels of existing and

future public transport accessibility (T6). It also fails London Plan policies to make the best use of land (GG2) and to optimise the potential for housing delivery especially on well-connected sites with PTAL 3-6 and on car parks and other low-density sites (HI). It does not conform with the Mayors Transport Strategy (MTS) or the NPPF (eg. paragraph I25).

In addition, the reference to “*an agreed local parking strategy*” is unclear. Who would be responsible for preparing it? What matters would it cover? Who would be consulted? Would it be part of the Local Plan? What is meant by “*local*”—borough wide or at a lower-level?

We note that the “*Reason for Modification*” that is provided relates to “*add[ing] clarity around the parts of the borough in which reductions in public car parking need to be carefully managed to ensure ongoing town centre vitality and viability, so as to be consistent with national policy*”. Such justification does not apply to TfL’s station car parks as they provide car parking for London Underground passengers; they are not shopper or town centre car parks. Therefore, as a minimum, the reference to public car parking at strategic public transport nodes should be removed; however, the opportunity could be taken to redraft the whole paragraph so that it aligns more closely with the London Plan and MTS. As a minimum we suggest:

B. 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 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.

The reference to “*Parking at transport nodes*” should also be deleted from paragraph 10.2.9. We do not agree that car parks at underground stations “*actively reduce congestion*”. User surveys we have undertaken at station car parks reveal that a large majority of car journeys to stations could be easily transferred to public or active transport modes, and that, outside of London, it would be possible to undertake shorter drives to nearer Network Rail stations. Therefore, closing station car parks can reduce car journeys and congestion. As a minimum we suggest:

10.2.9 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~~.

MM59 Site Allocations – List of Sites Table

For Site O7 (Rayners Lane Station Car Park) we agree the removal of car parking as a suitable non-residential land use and its substitution with town centre uses on the eastern part. As set out in the SoCG, we also consider that industrial / employment uses could be appropriate on this site, particularly if it continues to be unviable to deliver new housing.

For Site O20 (Canons Park Station Car park) we do not agree with the addition of text referring to the support of multi-modal travel, in line with our representations above on MM55 and with the SoCG and other representations that we have made at Regulations I8 and I9 and in response to MIQs.

We also do not agree with the addition of text referring to the support of multi-modal travel in respect of Site O22 (Stanmore Station Car Park) for the same reasons. We do, however, support

the addition of transport operations and Class E uses to the list of suitable non-residential land uses.

MM87 Site 07 Rayners Lane Station Car Park

We agree with the removal of the shops on Alexandra Avenue from the SA boundary and **Description** (see also our comments on the Atlas of Change below).

We support the deletion of retaining or re-providing car parking on the site as a **Site Objective**. This accords with discussions at the EiP and the SoCG. On the same basis, we also support deletion of car parking as an **Allocated Use**.

We note the increase in the number of homes from 69 to 73. This is certainly an improvement and we welcome it now being expressed as a minimum. However, we do still have concerns that this number may not optimise the development potential of the site given its location next to a London Underground station, and also that it may continue to be unviable. It is likely that the number of homes would have to be significantly exceeded.

We support the revised **Requirement** to “*Contribute towards the provision of step-free access ... commensurate to the quantum of development*” which accords with our previous representations.

MMI00 Site 20 Canons Park Station Car Park

Notwithstanding the slight increase in **Residential Capacity** from 26 to 29 homes and expression of this as a minimum, the Main Modifications do not substantially address our position set out in our Regulation I9 representations, later responses to MIQs or the SoCG. Development in the form set out in the SA would not optimise the development opportunity provided by this site and is unlikely to be viable and therefore deliverable.

MMI02 Site 22 Stanmore Station Car Park

We support the additional **Allocated Uses** – transport operations and Class E uses, in line with our representations, discussions at the EiP and the SoCG.

While we note the small increase in the number of homes from 183 to 199, and we welcome it now being expressed as a minimum, we maintain our concerns that this number may not optimise the development potential of the site given its location next to a London Underground station, and also that it may continue to be unviable. It is likely that the number would have to be significantly exceeded if the site is to be developed.

The Main Modifications do not substantially address our position set out in our Regulation I9 representations, later responses to MIQs and the SoCG.

Additional Modifications (ref: ED35)

We have no comments.

Amendments to the Policies Map / Atlas of Change (ref: ED34)

Rayners Lane Station Car Park (O7)

We requested deletion from the site allocation boundary of the shopping parade fronting Alexandra Avenue and the TfL operational car parking areas behind it (see for eg. SoCG, paragraph 4.5). They are not available for development. Therefore, we support this amendment to the site boundary.

Canons Park Station Car Park (O20)

We support removal of the ambulance storage land from the site allocation. However, if that land becomes available at a later date, we may include within a development site.

Stanmore Station Car Park (O22)

We requested inclusion of the land at the northern end of the site adjacent to the ticketing office as it could be made available for development. We therefore support this amendment to the SA boundary to include this land. See SoCG, paragraph 4.34.

However, we do not support the other change that has also been made to the site boundary – removal of part of the eastern extent of the site. Indeed, we consider that the site boundary should be as set out in our Reg I9 representations (EIP doc ref: 206) at page 26 – including the area of SINC which is within our ownership and could be used for amenity purposes / landscape setting. See for eg SoCG, paragraph 4.31.

Concluding Remarks

We trust that we have provided sufficient information to be able to consider these representations. However, if you require any additional information, please do not hesitate to contact me or my colleague Luke Burroughs.

Yours faithfully

[REDACTED]
Brendan Hodges

Planning Manager (Residential and Commercial)
Places for London

cc.

[REDACTED]