

David Hughes
Strategic Planning
London Borough of Harrow
Planning and Building Control
PO Box 1358
Harrow
HA3 3QN

Department: Planning
Our reference: LDF15/LDD01/LP02/ES01
Date: 16 December 2024

By email: 

Dear David

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2012**

**Re: Proposed Submission Version of the Hounslow Local Plan 2020-2041 Regulation 19
consultation**

Thank you for consulting the Mayor of London on the London Borough of Harrow's (LBH's) proposed submission version Local Plan (Regulation 19). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments on the earlier LBH Regulation 18 consultation on the earlier Harrow Draft Local Plan on 25 April 2024 (Ref: LDF15/LDD10/LP01/JP01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is more closely aligned with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous response. The LP2021 was formally published on the 2 March 2021, and forms part of LBH's Development Plan and contains the most up-to-date policies.

General

The current LBH Local Plan was adopted in 2012 and this consultation represents an important step towards delivering a new, up-to-date Local Plan for the borough. The draft Local Plan is underpinned by a spatial vision which sets out the intended character of LBH by the end of the Local Plan period. The borough also sets out 12 strategic objectives which aim to strengthen LBH's local identity.

At the Regulation 18 consultation, the Mayor provided advice and guidance, and didn't raise any significant concerns. As currently drafted it is the Mayor's opinion that the draft Local Plan is in general conformity with the LP2021; although this letter provides some further guidance to bring the draft Plan into closer alignment with the LP2021.

Spatial Strategy

The borough is home to one Opportunity Area (OA), namely, Harrow and Wealdstone OA with an indicative capacity for 5,000 homes and 1,000 jobs as set out in Table 2.1 of the LP2021. This is reflected in the draft Plan and is noted and welcomed.

Housing

LBH's housing target as set out in Table 4.1 the LP2021 is for the delivery of 8,020 new homes between 2019 and 2029 and the draft Plan sets out a clear commitment to meet that target. The draft Plan period starts in 2021, with LBH exceeding their housing target by 454 homes between 2019 and the start of the Plan period in 2021.

LBH proposes to deliver a minimum of 16,040 net homes during the Plan period (2021/22-2040/41). This equates to 802 per year on average over the Plan period. The intention to roll forward the housing target beyond the London Plan period is supported. It is noted that proposed changes to national policy are likely to mean a significant increase in London's overall housing need figure. The Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will apportion targets across boroughs. Recognition of this context would be a useful consideration when planning for housing beyond 2029 as well as the new NPPF and the mandatory housing requirement for London of 87,992 homes per year.

LBH's small site's target is set out in Table 4.2 of the LP2021 to deliver 3,750 new homes a year up to 2029. This is reflected in the draft Plan which is noted and welcomed. In order to meet that target, LBH should explore all the mechanisms at their disposal to facilitate all sources of housing supply including from small housing site development. LBH is advised to follow the guidance set out in Policy H2B of the LP2021 by preparing site-specific briefs, masterplans and housing design codes for small sites. The Mayor has also published his Small Sites Design Codes LPG¹. Small sites should be considered as a valuable source of housing delivery and should be optimised to contribute towards meeting the borough's housing target. It is noted that LBH consulted on a draft Small Sites Design Code SPD in early 2022 and the Mayor encourages this to be developed and adopted.

¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/small-site-design-codes-lpg>

Affordable housing

The draft Plan reflects the Mayor's strategic target set out in Policy H4 of the LP2021, that 50 per cent of all new homes are to be genuinely affordable, which is noted and welcomed. Policy H04G of the draft Plan sets out a 70/30 affordable housing tenure split in favour of low-cost rent, which is consistent with the approach set out in Policy H6 of the LP2021.

LBH's draft Plan follows the Mayor's threshold approach to affordable housing and makes it clear that schemes which meet the requirements of Policy H5 of the LP2021 will be able to follow the Fast Track Route, which is consistent with the LP2021.

The draft Plan reflects the thresholds set out in Policy H5 of the LP2021 and makes it clear that in addition to the 35 per cent threshold on privately owned land the threshold is set at 50 per cent on publicly owned land where there is no portfolio agreement with the Mayor and on industrial land where development would lead to a loss of industrial capacity.

Gypsy and Traveller accommodation

LBH plan to meet their Gypsy and Travellers accommodation needs, citing the GLA's ongoing Gypsy and Traveller Accommodation Needs Assessment (GTANA) which will establish a need for between 12 and 13 Gypsy and Traveller pitches over a ten-year period. Watling Farm Close is identified as delivering 12 to 13 new Gypsy and Traveller pitches, which should completely meet the identified need over the ten-year period as required by Policy H14 of the LP2021.

LBH should note that the GTANA is due to be completed and published in spring 2025. Pending the completion of this, LBH may need to update the accommodation need in line with its findings and explore potential site allocations to provide sufficient capacity. LBH should refer to the figures from the report as provisional until the GTANA is published.

Green Belt

Strategic Policy 07 and Policy GI1 of the draft Plan is clear that Green Belt and Metropolitan Open Land (MOL) will be protected from inappropriate development which is consistent with LP2021 Policies G2 and G3 which is noted and welcomed.

In the site allocations, two Green Belt sites have been identified for development. One of them is at Watling Farm and is for the 12 to 13 additional Gypsy and Traveller pitches required to meet identified need. The other site is the Royal National Orthopaedic Hospital (RNOH) and is allocated for the modernization and extension of the hospital as well as 500 new homes. Both sites are currently allocated in the adopted Local Plan and also have associated but lapsed planning permissions. As such, it is assumed that LBH may need to establish exceptional circumstances to justify the proposed developments in these allocations again.

Metropolitan Open Land

LBH is proposing to adjust an area of MOL, as part of a land swap which will result in no net loss of MOL. This is at Harrow on the Hill School, for which a planning application was

allowed at appeal. The Mayor has no objections to this proposed land swap given that there will be no net loss of MOL.

Industrial capacity

LBH are promoting strong protection of the borough's Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) for industrial use, which is welcomed. Paragraph 5.0.6 of the draft Plan establishes a strategic need to deliver 6,000sqm of industrial floorspace over the life of the Plan. This clarity is welcomed and will enable LBH to broadly plan to meet industrial needs. LBH should establish how much of that need is specifically for Class B uses, and then focus on meeting that need, in particular, in designated industrial areas. LBH should focus on those industrial needs which it can control, and which fall outside of Use Class E.

The Mayor considers that a proactive approach is required to meet the identified need and LBH should do this by identifying and exploring suitable industrial areas where there is capacity for industrial intensification and promote that through masterplans and/or site allocations. Additionally, LBH should monitor industrial development to ensure that the need is met over the Plan period, especially that need which falls within Class B.

Site allocation (OA17- Former Kodak Administration Offices) is located within SIL (0.47ha) and has been identified for co-location with non-industrial uses, specifically residential uses on the upper floors. The site is currently occupied by an office building which has been vacant since 2018. If it is LBH's intention to introduce residential uses at this site, it is suggested that the borough downgrade the designation to LSIS or remove the designation entirely.

LBH are proposing to designate three new areas of LSIS and release an existing one, which appears to be entirely occupied by residential uses. This is noted and generally supported.

Tall buildings

Policy GR4 defines tall buildings as 21m in height, or 7 storeys, as measured from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure). This definition aligns with Policy D9A of the LP2021. LBH has identified one area that may be suitable for tall building development in the Harrow and Wealdstone OA and corresponding appropriate building heights are set out within this. This is illustrated in the Designated Tall Building Zones Map in the draft Plan. LBH's approach to tall buildings is therefore consistent with the requirements of Part B of Policy D9 of LP2021.

This map sets maximum appropriate heights for buildings in different zones. The term 'appropriate' building heights as set out within Policy D9 is preferred to 'maximum height'. The Mayor advises that maximum heights for tall buildings should be used sparingly where there is a clear constraint on development above a certain height. For example, this could be an aviation threshold or due to the impact on a protected viewing corridor. In light of this, LBH should amend instances where the use of the term 'maximum' heights or similar is used throughout the draft Plan.

There are two strategic views that intersect with the borough and these are illustrated in Appendix 3. This should be replaced with a much clearer image and included in the main text of the draft Plan, so that it is easy to determine if a site lies within a strategic viewing corridor or not which will aid decision making.

Burial space

Paragraph 6.1.7 of Policy CI1 sets out that LBH is ‘continuing to seek to identify and understand community need related to burial space’. LP2021 Policy S7 sets out that Development Plans should ensure provision is made for the different burial requirements of London’s communities. A needs assessment for burial space including an audit of existing provision should inform the level of need required in the draft Plan.

LBH’s intention to work with other boroughs is supported, given this can be a cross-boundary issue, and the use of agreements such as through the Duty to Cooperate, or its successor, are encouraged.

Waste

The West London Waste Plan (WLWP) was adopted by the West London Waste Planning Group of boroughs, of which LBH is a part, in 2015. As such, the waste plan is considered to be out-of-date. Strategic Policy 09 of the draft Plan is therefore reliant on an out-of-date waste strategy as it was based on the apportionments set out in the 2011 version of the London Plan. For this reason, the draft Local Plan does not adequately demonstrate LBH’s ability to meet its waste apportionment targets for household, commercial and industrial waste as set out in Table 9.2 of the LP2021.

It is noted that a review of the WLWP is underway but is at the very earliest stages of preparation. As such, the Mayor advises that, as a minimum, Policy 09 of the draft Plan should seek to clearly protect existing waste sites until the joint waste plan is completed, at which point it will form part of LBH’s Development Plan and will set out the strategic approach for the sustainable management of waste in accordance with the LP2021.

Transport

While the adoption of LP2021 maximum car parking standards is supported, further amendments to the wording of specific policies are needed to ensure that the Local Plan is fully consistent with LP2021 parking policies. A number of site allocations are proposing the re-provision of car parking where this would exceed maximum car parking standards. For a number of sites, the requirement to retain parking spaces does not take into account the location or PTAL and as a result fails to optimise use of the site. To ensure best use of land in well-connected locations, these requirements should be amended.

Site Allocations

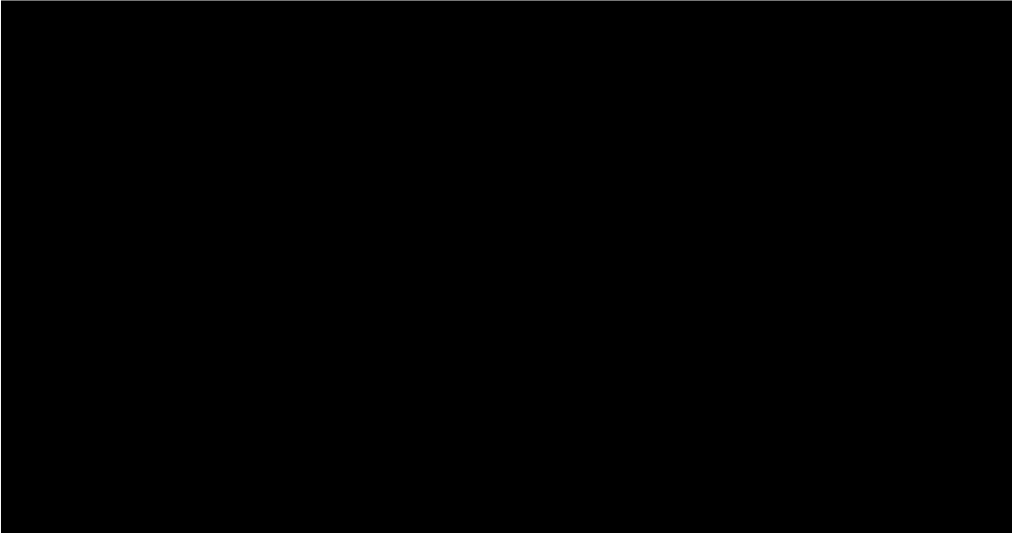
Site/s	Comments
Site OA10 -Wealdstone	Both allocations are currently designated LSIS and as such it should

<p>Probation Office</p> <p>Site OA13 -Travis Perkins Wealdstone</p>	<p>be made clear that current industrial capacity should at least be maintained or intensified.</p> <p>One way of doing this would be to set out the current baseline industrial floorspace capacity so that it can be monitored. As the intention is to co-locate industrial with residential development, reference to the agent of change principle should be made clear so that industrial activities can take place effectively without causing nuisance to future residents.</p>
<p>Site OA16 -Kodak</p>	<p>The northern part of the site is currently designated as SIL. It is noted that the site is an allocation in the current Local Plan and that there has been a significant planning history in recent years. To be consistent with Policy E7 of the LP2021 it is important that the allocation sets out how, and if, the SIL boundary is to change. As set out in Policy E5(C) of the LP2021, non-industrial uses should not be located within SIL. If it is the intention to introduce non-industrial uses within the area designated as SIL the boundary will be required to change, resulting in either downgrading to LSIS or to non-designated industrial land. If SIL is to be lost, as a result of the proposed reconfiguration, LBH will need to establish how this is being replaced and how it affects the boroughs plans to meet industrial need.</p> <p>In addition, as the site is adjacent to SIL it should be clear that the introduction of non-industrial elements should not prevent or negatively impact the ability of industrial activity to take place . As set out in Policy E5D of the LP2021 residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised.</p>

Next steps

I hope these comments positively inform the ongoing preparation of LBH’s Local Plan. We continue to be keen to work with you to address the issues identified in this letter and to ensure it aligns with the LP2021 as well as delivering the Council’s objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact [REDACTED].

Yours sincerely,





New Local Plan
Planning Policy Team
London Borough of Harrow

Transport for London
Spatial Planning

8th Floor
5 Endeavour Square
London E20 1JN

Annex 1 Transport for London Response

Phone 07891 986 623
tfl.gov.uk

localplan@harrow.gov.uk

16 December 2024

Harrow's New Local Plan 2021-2041: Submission (Regulation 19)

Thank you for giving TfL the opportunity to comment on the regulation 19 version of Harrow's local plan. We previously submitted representations on the regulation 18 version in April 2024 and this response updates those comments, reflecting changes that have been made and the new section on site allocations.

Please note that these comments represent the views of Transport for London (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.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy (MTS). In particular, it is important

that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We therefore are broadly supportive of the policies in the draft Local Plan which support shifting journeys to sustainable modes and adopt the Healthy Streets Approach. In particular, we are supportive of the emphasis placed on measures to support active travel and public transport and the promotion of car-free and car-lite development, although this aspect could be strengthened further as set out in our detailed comments. While we support the adoption of London Plan car parking standards and welcome some of the positive changes to policy wording in response to our regulation 18 representations, we have indicated some further amendments that are needed to ensure soundness and consistency with London Plan parking policies in our detailed comments.

We are also concerned at the large number of site allocations that require re-provision of car parking where this is not appropriate. In many cases, a requirement to retain parking spaces does not take into account the location or site PTAL and as a result fails to optimise use of the site. We have indicated where amendments need to be made to ensure soundness and consistency with the London Plan. This is particularly important in the context of Harrow being an outer London borough where there is much greater scope to increase the active, efficient and sustainable mode share in line with targets, including through car parking restraint.

We welcome the addition of explicit support for public transport and active travel improvements through planning contributions. We also welcome reference to active travel schemes which the Council is currently developing with TfL. This could be supported by maps which outline existing, planned and proposed schemes including gaps in provision in line with the 'Sustainable Transport, Walking and Cycling' London Plan Guidance.

We look forward to continuing our work together in developing the local plan. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth in Harrow and across London.

We have a number of detailed comments and suggestions for amendments on specific policies and site allocations providing updates to our Regulation 18 representations. These are included in the appendix to this letter.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Josephine Vos', is centered below the text. The signature is fluid and cursive.

Josephine Vos
London Plan and Planning Obligations Manager
Email: josephinevos@tfl.gov.uk



Appendix: TfL detailed comments and suggestions for amendments with updated comments for the regulation 19 consultation

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
<p>General comments</p>	<p>TfL support the Council’s wish to adopt more restrictive general parking policies across the borough, in line with the parking standards in London Plan Policy T6 Car parking.</p> <p>The London Plan sets out an approach to car parking based on maximum upper limits rather than requirements. The starting point for all developments in well-connected areas should be car-free and, in less well-connected areas, developments should be car-lite to ensure growth is sustainable. Therefore, the Council should use London Plan Policy T6 to set car parking standards, not just in Policy M2 but throughout the local plan. There are currently a number of policies throughout the local plan which refer to ‘appropriate levels of car parking’. They should in all instances refer to ‘Car parking provided in line with the maximums set out in Policy M2’ which should itself be amended to be in general conformity with London Plan Policy T6, as detailed further in the comments below.</p>	<p>We welcome changes to a number of policies that clarify that ‘Car parking will be provided in line with Policy M2’ However further changes are needed to the wording of Policy M2 itself to ensure it is consistent with London Plan Policy T6 as set out below.</p>

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	<p>While we welcome the Council’s commitment and support for improving walking, cycling and public transport across the borough through Local Plan policies, we would encourage you to set out objectives to enhance cycle infrastructure and improve cycle networks. Reference should be made to Cycleways and proposed improvements alongside mapping of the aspirational walking and cycling networks in line with guidance in the ‘Sustainable Transport, Walking and Cycling’ London Plan Guidance (LPG).²</p> <p>We welcome the borough’s commitment to inclusivity particularly in the public realm, yet the document fails to explicitly mention ‘women’ anywhere within the text. The Mayor’s Violence Against Women and Girls Strategy notes the importance of the public realm for the safety of women. TfL would encourage further detail on gender inclusive design and travel considerations within this policy document. The GLA have published guidance on this topic – Good Growth by Design: Women, Girls and</p>	<p>We welcome the additional references to active travel projects but the Local Plan should also include a map of the existing and aspirational walking and cycling networks including gaps in provision and proposed improvements in line with the Sustainable Transport, Walking and Cycling’ London Plan Guidance (LPG). Reference should be made to TfL’s Strategic Cycling Analysis which identifies potential cycling connections. A large number of the Local Plan site allocations fall within areas identified as having a high or medium potential and so we would expect developments to contribute towards active travel improvements.</p> <p>We welcome the addition of new sections that provide further details of commitments to address safety issues including violence against women and girls.</p>

² Available at london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/sustainable-transport-walking-and-cycling-guidance.

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	Gender Diverse.	
Policy SP01 High Quality Growth	N/A	Para. 2.0.10 - We note the insertion of new paragraph 2.0.10. The first sentence should be amended as follows: 'New growth requires infrastructure to support its potential impacts, such as highway transport improvements, school places, access to doctor surgeries.'
Policy GR3 Public Realm and Connecting Places	<p>We welcome part B: 'Be designed to achieve the Mayor's Healthy Streets for London indicators to promote non-vehicular travel in a safe, effective, and efficient manner' and the link made between providing a public realm which supports walking and cycling and reducing the reliance on cars.</p> <p>London Plan policies T2 Healthy Streets and SD6 Town centres and high streets support the idea of planning areas which increase the capacity for public transport, walking and cycling to reduce the reliance on travel by car.</p> <p>We further welcome the Council's recognition of how places feel different at night and encourage the Council to include public realm design guidance in Part 1.4 of the Mayor's 'Violence Against Women and Girls (VAWG)' Strategy in the draft Local Plan.</p>	<p>We welcome the addition of paragraphs 2.3.18 – 2.3.23 which address safety issues including violence against women and girls.</p>
Policy GR4A –	N/A	We note the introduction of this new policy. An

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
Basement development		<p>additional condition needs to be added to part A 'does not adversely impact on sub-surface transport or utilities infrastructure' The supporting text should include a requirement to consult with the owners or providers of sub-surface infrastructure to ensure that the proposed works do not have any adverse impacts either during construction or when completed.</p> <p>The requirement in part Ag to 'Continue to provide for appropriate landscaping and parking provision within the front garden' should be amended to remove reference to parking provision as shown.</p>
Policy GR10 Infill and backland sites, back gardens and amenity areas	<p>We are concerned with the drafting of this policy which implies the use of parking minimums, as outlined in the letter, and recommend that part Ae is amended to 'Appropriate levels of car Car parking is provided in line with Policy M2 commensurate to the scale of development, with servicing and refuse collection adequately addressed.'</p>	<p>Although we welcome the addition of a reference to Policy M2, the wording should be further amended as shown because car parking standards already reflect the scale of development.</p> <p>'Appropriate levels of car parking is provided in line with Policy M2 commensurate to the scale of development, with servicing and refuse collection adequately addressed.</p>
Policy GR11 Planning obligations	<p>This policy only makes specific reference to affordable housing and site-specific mitigations. It should be amended to include public transport in line with part D of London Plan Policy DF1 Delivery of the plan and planning obligations. London Plan Policy DF1 gives equal</p>	<p>Although we welcome the addition of a reference to public transport this should be included alongside affordable housing to ensure consistency with London Plan Policy DF1. It would also be helpful to add active travel improvements to the list of relevant infrastructure</p>

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	<p>priority to affordable housing and necessary public transport improvements.</p> <p>Para. 2.11.4 – We also suggest adding planning obligations being sought for public transport improvements to this paragraph. Contributions towards public transport services, stations, junctions/roads, or infrastructure to provide increased capacity or improved accessibility may be required to mitigate impacts arising from developments that generate increased demand on the transport network. Similarly, S.106 contributions towards walking and cycling infrastructure or the wider public realm may also be required from developments to meet the Mayor’s Healthy Streets Approach or to address deficiencies identified through an Active Travel Zone Assessment.</p>	<p>as shown below:</p> <p>‘Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes and necessary public transport improvements, and to ensure that all relevant development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Relevant infrastructure may include matters (but not limited to) such as public transport, active travel, health, counter-terrorism and public realm improvements.</p> <p>We welcome the addition of the following text to paragraph 2.11.4 although we recommend amendments as shown to ensure consistency with the London Plan and to provide greater clarity.</p> <p>‘Where considered a requirement a S.106 obligation may be secured for public transport for improvements to infrastructure such as transport bus services or bus infrastructure, stations access or capacity, junctions/roads or infrastructure to provide increased capacity or improved accessibility. or to contribute to new an improved public realm. Similarly, S.106 contributions towards walking and cycling infrastructure</p>

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
		<p>or the wider public realm may also be required from developments to meet the Mayor’s Healthy Streets Approach or to address deficiencies identified through an Active Travel Zone Assessment.’</p>
<p>Policy HO2 Conversion and redevelopment of larger dwellings</p>	<p>Part 2j is not consistent with London Plan Policy T6 Car parking or local plan Policy M2 and should be amended to ‘Make adequate provision for parking and <u>Ensure any car parking is provided in line with Policy M2 and provides safe access to and within the site and not lead to any material increase in substandard vehicular access</u>’.</p>	<p>Although we welcome the addition of a reference to Policy M2 this is insufficient to ensure consistency with London Plan Policy T6 because there will be well connected locations where car parking is not required. To ensure soundness and consistency with the London Plan the wording should be as set out in our regulation 18 representation ‘Make adequate provision for parking and <u>Ensure any car parking is provided</u> in line with Policy M2 and provides safe access to and within the site and not lead to any material increase in substandard vehicular access’.</p>
<p>Policy HO3 Optimising the use of small housing sites</p>	<p>Part 3d is not consistent with the London Plan and should be amended to ‘Ensure sufficient parking is provided on-site <u>any car parking is provided in line with Policy M2 to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users</u>’.</p>	<p>Although we welcome the addition of a reference to Policy M2, this is insufficient to ensure consistency with London Plan Policy T6 because there will be well connected locations where car parking is not required. To ensure soundness and consistency with the London Plan the wording should be as set out in our regulation 18 representation ‘Ensure sufficient parking is provided on site <u>any car parking is provided</u> in line with Policy M2 to avoid the risk of harm to safe operation of the</p>

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
		surrounding highway network and safety of other road users’.
Policy HO5 Housing estate renewal and regeneration	<p>London Plan parking standards provide firm maximums with the starting point being car-free in well-connected places and car-lite in less well-connected places as stated in the general comments. There is already sufficient flexibility within those standards to reflect local circumstances through the use of less stringent standards for outer London compared to inner London.</p> <p>London Plan Policy T6 Car parking is also clear that where redevelopment of a site with existing car parking occurs, any reprovision should be provided in line with the current standards. Where there are existing residents and car ownership exceeds the maximum car parking that would be permitted, a plan for the management and reduction of car parking spaces as existing residents move out should be secured through a Parking Design and Management Plan.</p> <p>The wording in part 1K should be amended as follows: ‘Compliance with parking standards set out in Policy M2 should apply unless exceptional local circumstances are demonstrated’ to reflect the standards in the London</p>	<p>We note that no changes have been made to part 1K and so we reiterate our previous comments. To ensure soundness and consistency with the London Plan and to avoid undermining the approach to car and cycle parking</p>

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	Plan.	the wording in part 1K should be amended as follows: 'Compliance with parking standards set out in Policy M2 should apply unless exceptional local circumstances are demonstrated '.
Policy HO6 Accommodation for older people	Part 3e should be amended to read: 'Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off within 50m of the main entrance... in line with Policy M2 ' to be consistent with part 2j. The supporting text should provide further explanation regarding what adequate means.	We welcome the amendment to part 3e of the policy in line with our regulation 18 representation which now reads ' in line with Policy M2 '.
Policy HO10 Housing with shared facilities	Houses in Multiple Occupation (HMOs) exceeding 6 beds are classed as sui generis and their development would therefore need to be car-free and located in well-connected areas, under part E of London Plan Policy T6.1 Residential parking. Accordingly, Policy HO10 part 11 should be revised to ' Adequate provision is made for car parking and It is car-free and provides safe access to property and does not result in a harmful cumulative increase in impact on on-street parking (in compliance with policy M2 Parking) or the safety of other road users '. Consideration should also be given to part C of London Plan Policy T6 Car parking: 'An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement	We note that no changes have been made to part 11 and so we reiterate our previous comments. To ensure soundness and consistency with the London Plan the wording in part 11 should be amended as follows: ' Adequate provision is made for car parking and <u>It is car-free and provides safe access to property and does not result in a harmful cumulative increase in impact on on-street parking (in compliance with policy M2 Parking) or the safety of other road users</u> '.

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	<p>these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.'</p>	
<p>Strategic Policy 05: Harrow & Wealdstone Opportunity Area</p>	<p>We encourage the Council to outline plans to improve walking and cycling connectivity in the policy and supporting text, and this should be illustrated by a map showing proposed routes in the local plan in line with the Sustainable Transport, Walking and Cycling LPG, with particular reference to how it will support development in the Opportunity Area.</p> <p>Part D – While we welcome parts De, Df and Dg, we suggest amending part De to 'Improve the pedestrian walking connectivity and the walking environment throughout the Metropolitan Centre' and Df to 'Car parking is provided in line with London Plan standards Provide appropriate levels of car parking, including Electric Vehicle charging points'.</p> <p>The second sentence of para. 5.0.39 should be amended as follows: 'Improving sustainable transport will reduce the amount of vehicle movements improving climate change matters and air quality, and also moving towards a less car dominated centre where pedestrians are more</p>	<p>We welcome changes to part De and part Df in line with our regulation 18 representation. However, in part De 'the pedestrian' should also have been deleted so that it reads as follows: 'Improve the pedestrian walking connectivity and the walking environment throughout the Metropolitan Centre'.</p> <p>We welcome the change to the second sentence of para. 5.0.38 in line with our regulation 18 representation. We also welcome confirmation that 'The Harrow Town Centre Masterplan will assist in setting out (among other things) how sustainable transport such as walking and</p>

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	comfortable walking and cycling are prioritised .	cycling will be considered within the Harrow Town Centre and linking to the wider Harrow & Wealdstone Opportunity and beyond.'
Policy LE2	We would encourage the borough to clarify what is meant in part A.b. when referencing proposals which 'satisfactorily mitigate any negative parking or traffic implications'. We would further recommend adding a comment on the need for 'development proposals to consider and mitigate travel at night both onsite and in the surrounding area in line with the Mayor's 'Violence Against Women and Girls' (VAWG) and Night Time Strategies.	We note the addition of explanatory text in para. 5.2.3 'Whilst sustainable modes of transport, including walking and cycling are encouraged, nevertheless some nighttime activities may still rely on vehicles such as the private car and taxi / uber movements. Night-time activities should set out how servicing such as taxi / uber drop offs and pickups are able to be undertaken without harm to neighbouring properties or highway safety.' We welcome the addition of part D although we suggest a minor amendment to emphasise the need for safe night-time travel as follows: 'All new proposed night-time activities must seek to ensure all residents are able to participate in and travel safely to nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community.'
Paragraph 7.4.5	N/A	We welcome insertion of the new paragraph supporting green infrastructure in kerbside space but suggest an addition as follows: 'Kerbside space should be used for green infrastructure where it contributes positively to the public realm (in line with policy GR3) and is not required for active travel upgrades or public transport

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		facilities.'
Strategic Policy 10 Movement	<p>We support the broad principles set out in this policy including the intention to minimise private vehicle journeys where possible. While we welcome the inclusion of the London-wide target for 80 per cent of journeys to be made by active, efficient and sustainable modes in the supporting text, we recommend that the policy itself include, at a minimum, the Harrow Local Implementation Plan (LIP) target for 64 per cent of all journeys in the borough to be made by active, efficient and sustainable modes by 2041. Given this target was set in 2018 and Harrow is currently ahead of trajectory, we would encourage a more ambitious target. We would be happy to work together to reassess the 2018 target.</p> <p>We welcome the Council's commitment to improve the walking, cycling and public transport networks, as well as to apply the Healthy Streets Approach. We particularly welcome the wording in part E of the policy which states that the Council will 'encourage and enable' travel by active modes through improvements to the walking and cycling infrastructure.</p> <p>Alongside measures to improve the walking, cycling and</p>	<p>Although it is not included within the Policy, we welcome the addition to paragraph 10.0.3 which states that 'The Council will work with TfL to identify additional targets for future iterations of the Mayor's Transport Strategy.'</p> <p>We also welcome the addition of paragraph 10.0.4 which includes reference to the Healthy Streets Data Park produced by TfL which shows that Harrow is on track to meet 2041 commitments. We would welcome further discussions to identify additional targets in advance of the next Mayor's Transport Strategy.</p>

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	<p>public transport networks, one of the most important measures for achieving the strategic aims set out in Strategic Policy 10 Movement is car parking restraint. We therefore strongly suggest that the list of proposed measures includes supporting car free development in well-connected locations and delivering car-lite development elsewhere.</p> <p>In line with London Plan Policy T1 Strategic approach to transport and in line with the LPG, the local plan should clearly set out the proposed transport improvements which will support the delivery of the Local Plan, including a map of existing and proposed walking, cycling and public transport improvements.</p> <p>Part A – We support the Council’s requirement of development proposals to facilitate improvements to transport infrastructure. We encourage the Council to also clearly set out that development proposals are expected to mitigate their transport impacts through planning obligations.</p> <p>We support the improvement of public transport and safeguarding assets in line with London Plan Policy T3</p>	<p>We note that no change has been made in line with our regulation 18 representation and so we reiterate our request for Strategic Policy 10 to include support for car free development in well-connected locations and delivering car-lite development elsewhere as one of the proposed measures to ensure consistency with London Plan Policy T6.</p> <p>We also strongly encourage you to set out the proposed transport improvements which will support the delivery of the Local Plan, including a map of existing and proposed walking, cycling and public transport improvements.</p> <p>Part A - We welcome the addition to part A so that it now reads: ‘Development proposals must facilitate improvements to transport infrastructure through active travel, and the public transport network to deliver safe, accessible, inclusive, healthy, walkable and sustainable neighbourhoods, <u>and mitigate their transport impacts through planning obligations.</u>’</p>

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	<p>Transport capacity, connectivity and safeguarding. We would encourage more in-depth proposals to outline key sites where these deliverables will be prioritised.</p> <p>Part B – There should be an explicit link between making effective use of land and applying a policy of car parking restraint. Car parking requires a significant amount of space and thus reduces the amount of space available to provide local services, amenities or additional housing. Additionally, even where car parking is not provided at surface level, the access arrangements often lead to a detrimental impact on the public realm and people walking, cycling and using public transport.</p> <p>Part C – In line with accessibility improvements, TfL encourages further proposals to introduce fully accessible station links in all directions, through step-free access schemes in addition to the existing step free stations like Harrow-on-the-Hill and Harrow & Wealdstone. Part C should also refer to increasing public transport capacity where needed to support new development.</p> <p>Part E – TfL supports the commitment to broad</p>	<p>Part B - We welcome the addition to part B so that it now reads: ‘Development must make effective use of land, improving its connectivity and accessibility to existing and future public transport, walking and cycling routes, <u>complying with London Plan parking standards to reduce the land take needed for carparking</u> and mitigating any adverse impacts on London’s transport networks and supporting infrastructure.’</p> <p>Part C - We welcome the additions to part C so that it now reads ‘The Council will seek to improve access to public transport, <u>including the provision of fully accessible step-free station links</u>, particularly in areas of deprivation and for people with a disability, by working with Transport for London (TfL) to promote and improve public transport infrastructure, <u>capacity where needed to support development</u> and all abilities access.</p>

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	<p>improvements to road safety, however, the policy or supporting text should include a reference to the MTS Vision Zero objective for no one killed or seriously injured on the transport network by 2041. We would further welcome the addition of a reference to movement both throughout the 'day and night' in consideration of the safety of women and of all users.</p> <p>Part F – We support the use of car clubs where they are used to reduce overall car ownership and use, however any strategy to deploy them should be carefully designed to avoid inadvertently increasing car use.</p> <p>Paras 10.0.3 and 10.07 – We support the borough's aims to reduce dependency on cars in favour of active, efficient and sustainable modes, and note that cars will continue to have a role in transport in Harrow, especially in the borough's less well-connected areas.</p>	<p>Part E - We support the addition to part E although we suggest a further amendment to address the point about day and night time travel as follows: 'The Council will seek to encourage and enable people to choose active transport <u>for day and night time travel</u> by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this <u>in line with the Mayor's Vision Zero objective.</u>'</p>
Policy M1: Sustainable Transport	<p>We support this policy's approach to protecting and enhancing walking and cycling routes and providing cycle parking that meets or exceeds London Plan standards and 'London Cycling Design Standards'.</p> <p>The policy should also set out requirements for</p>	<p>Although we welcome the strong focus on walking and cycling, there is very little about public transport in this policy or elsewhere in the local plan. We reiterate our regulation 18 representation that the local plan should set out requirements for safeguarding land for new transport projects as well as the protection and</p>

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	<p>safeguarding land for new transport projects as well as the protection and enhancement of existing transport infrastructure. In addition to active travel routes, this should include bus stations, stands, stops and driver facilities, bus garages, and rail and Underground stations and infrastructure.</p> <p>Part A – Although we continue to make the case for capital funding which could deliver upgrades where required, section 106 contributions, CIL and, where appropriate, work-in-kind from development in the surrounding area will be essential to enabling future improvements to the public and active transport networks. The policy should therefore state that contributions towards public transport capacity, station access improvements and active travel infrastructure will be required where justified.</p> <p>Part Ac – We support the creation of spaces safe and attractive for walking and cycling, in line with London Plan Policy T2 Healthy Streets and the LPG. It would be helpful to include any existing and proposed walking and cycle routes, including cycleways planned for implementation in partnership with TfL, in a map in the</p>	<p>enhancement of existing transport infrastructure. In addition to active travel routes, this should include bus stations, stands, stops and driver facilities, bus garages, and rail and Underground stations and infrastructure. This is necessary for soundness and to ensure consistency with London Plan Policy T3.</p> <p>We note that the addition of ‘mitigate their transport impacts through planning obligations’ to Strategic Policy 10 part A partially addresses the point about transport contributions and that this is supported by the additional text added to paragraph 2.11.4 (see comments above).</p> <p>We reiterate our regulation 18 representation about the need for a map of existing and proposed walking and cycling routes. The addition of paragraph 10.1.4 is helpful in setting out a number of active travel projects but in line with the Sustainable Transport, Walking and Cycling LPG these should be illustrated on a map of the existing networks that also identifies gaps in provision or areas</p>

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	<p>local plan. This could further provide justification for securing contributions towards improved connections. Further advice is provided in the LPG. Transport Assessments and Travel Plans should be in accordance with TfL guidance and a requirement for day and night-time Active Travel Zone Assessment should be included in this policy to work towards safe travel at all times of the day and night.</p> <p>Para. 10.1.1 – TfL supports the increase in active travel and the aim to make walking and cycling more attractive travel options in line with London Plan Policy T2 Healthy Streets.</p> <p>The borough should ensure that transport interchanges are accessible and well planned. For example, cycle parking at bus and rail stations must comply with London Plan Policy T5 Cycling.</p> <p>Para. 10.1.3 – It is important to emphasise that the network should be well planned in line with London Plan Policy T2 Healthy Streets. We support the general plans to enhance town centres and the public realm in line with London Plan Policy SD7. We encourage effective integration of active transport, walking and cycling links</p>	<p>for improvement. We note that amended paragraph 2.11.4 refers to the funding of measures identified through an Active Travel Zone Assessment but a requirement for day and night-time Active Travel Zone Assessments should be included in Policy M1 to ensure soundness.</p>

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	<p>across the borough and in and out of town centres. As previously stated, it would be useful to include a map of existing and proposed improvements as part of the policy and supporting text.</p>	
<p>Policy M2 Parking</p>	<p>We broadly welcome this policy however some changes are needed for clarity and to reflect London Plan Policy T6 Car parking. In particular, the policy should reflect that the starting point for all developments in well-connected areas is car-free, and car-lite in less well-connected areas to ensure conformity with London Plan Policy T6 Car parking. The policy overall may be clearer if divided into two sections: one relating to car parking provision and the other relating to cycle parking provision.</p> <p>Part A – While we support the overall intent of this part of the policy, it is not sufficiently clear. We recommend that the introduction to the policy be rephrased to ‘Proposals that make on-site provision for parking will be supported where <u>Development proposals will be supported where</u>’. This will ensure that the following requirements are clear for applicants.</p> <p>Part B – We strongly recommend removing entirely part</p>	<p>We note that paragraph 10.2.2 states that ‘Car free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6).’ This wording should be incorporated in the Policy to ensure consistency with London Plan Policy T6.</p> <p>Part A - We welcome the change made to part A in line with our regulation 18 representation.</p> <p>Part B - We note that no changes have been made to part</p>

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	<p>B of the policy which states: ‘Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and satisfactory mitigation, any special safety considerations and the desirability of achieving modal shift away from private car use.’</p> <p>Proposals should be consistent with the London Plan from the outset and additionally should demonstrate through a Parking Design and Management Plan, Travel Plan, or both, how car parking will be reduced or how cycle parking increased over time.</p> <p>We are not clear on what is meant by ‘exceptional operational requirements’ and we request that this is clarified. It should also be clarified that ‘exceptional operational requirements’ do not include provision of commuter parking. London Plan Policies T6 and T6.2-T6.4 set out that operational parking should be determined on a case-by-case basis, based on evidenced need.</p> <p>Operational parking is defined in Annex 3 of the London Plan as ‘parking for vehicles which are required for the function of a building or the activities within it. This can include spaces for fleet vehicles, taxis or loading bays, but does not include parking for personal travel such as</p>	<p>B in response to our regulation 18 representation. We reiterate our strong recommendation that the following wording in part B should be deleted: ‘Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and satisfactory mitigation, any special safety considerations and the desirability of achieving modal shift away from private car use.’ because proposals should be consistent with the London Plan.</p> <p>If any reference to ‘exceptional operational requirements’ is retained it needs to be defined in the glossary or supporting text based on the definition in London Plan Annex 3 which excludes parking for personal travel such as commuting.</p>

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	<p>commuting.'</p> <p>Part C – TfL encourage the use of car clubs in preference to residential parking and welcome the policy where these schemes will be encouraged 'in lieu of parking provision' as stated in London Plan Policy T6.1 Residential parking. Car clubs can act as a method through which car ownership and use is reduced, although this requires careful consideration so that their provision does not increase car dominance overall</p> <p>Part D – When designing and planning parking areas, Healthy Streets and active travel should be a priority as outlined in London Plan Policy T2 Healthy Streets.</p> <p>We welcome the prioritisation of the character of town centres in line with London Plan Policy SD6 Town centres and high streets. The Council should explicitly link the reduction of car parking, mode shift, improvements to walking, cycling and public transport to the subsequent access improvements to amenities across the borough.</p> <p>Part E – We are concerned with the lack of clarity on what makes on-site parking 'inappropriate'. We strongly</p>	<p>We welcome the amended wording so that it now reads: 'The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose, Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists <u>in line with London Plan Policy T2 (Healthy Streets)</u>.'</p>

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	<p>recommend the borough provides clearer criteria as to what it means here. While the supporting text states that 'New development must demonstrate that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking', this does not align with London Plan Car Parking policy (T6) on car-free and car-lite development.</p> <p>Part G – We welcome the prioritisation of walking, cycling and public transport in line with London Plan Policy T2 Healthy Streets when designing and planning parking areas (as in part D) and when applying parking restrictions. As London Plan Policy SD6 Town centres and high streets outlines, boroughs should promote sustainable access to and from town centres through walking, cycling and public transport modes. This point should be more explicit in local plan policy commitments to improving access. The services and activities which the public realm in town centres provide must also be supported as per London Plan Policy T2 Healthy Streets.</p>	<p>Part E – We welcome deletion of the reference to inappropriate on-site parking so that it now reads: 'Proposals that would result in inappropriate on-site parking provision, having regard to the supporting text in this policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.'</p> <p>Part G - We welcome amendments to part G so that it now reads: 'Development in Town Centres should prioritise walking, cycling and public transport, including access to and from town centres. The public realm will be designed to support modal shift away from car use. Services and activities within the public realm will be supported. London Plan car parking maximums for office, retail and hotel accommodation must be complied with.'</p> <p>Part H – We reiterate our regulation 18 representation</p>

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	<p>Part H – This part of the policy as currently drafted is not currently supported and should be amended to take account of London Plan standards, mode share targets, and the aim of encouraging active travel and reducing car use for access to town centres and rail stations. Town centre car parking should be the minimum necessary to meet essential needs, such as provision for disabled persons or operational car parking requirements and must be clearly justified on a case-by-case basis. This part of the policy should also be more supportive of the redevelopment of car parking for more productive uses in line with London Plan Policies GG1 Making the best use of land, H1 Increasing housing supply (Part Bb), SD7 Town centres (Part C6a) and Section 6 of the Sustainable Transport, Walking and Cycling LPG. We also believe that Part H contradicts Part G by stating that parking provision ‘should not adversely impact upon town centre vibrancy and vitality’.</p> <p>Para. 10.2.2 – We support the references to PTAL and the use of PTAL as a determiner for the implementation of car parking standards outlined in Policy M2, consistent with London Plan Policy T6 Car parking.</p>	<p>that this part of the policy as currently drafted is not supported and should be amended to take account of London Plan standards, mode share targets, and the aim of encouraging active travel and reducing car use for access to town centres and rail stations. Town centre car parking should be the minimum necessary to meet essential needs, such as provision for disabled persons or operational car parking requirements and must be clearly justified on a case-by-case basis. This part of the policy should also be more supportive of the redevelopment of car parking for more productive uses in line with London Plan Policies GG1 Making the best use of land, H1 Increasing housing supply (Part Bb), SD7 Town centres (Part C6a) and Section 6 of the Sustainable Transport, Walking and Cycling LPG. To ensure consistency with the approach to parking in the London Plan we recommend that it is redrafted as follows: ‘Proposals for the redevelopment of surplus, under-used or poorly located car parking for more productive uses are supported. Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality in line with the Harrow Parking Strategy. Proposals to improve the quality of</p>

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	<p>Para. 10.2.3 – We support the requirement for all development with new or re-provided parking spaces to be equipped with active electric vehicle charging points. The borough should ensure that electric vehicle charging provision does not increase overall parking provision and is compliant with part H of London Plan Policy T6: Car parking.</p> <p>Para. 10.2.5 –We appreciate the future-thinking approach in the local plan, and we strongly encourage more detailed proposals of developments across the borough to be put forward to ensure a clear link to the spatial strategy on supporting mode shift to walking, cycling and public transport alternatives.</p> <p>Para. 10.2.7 – We are concerned that the supporting text claims that ‘on-site parking often overcomes issues with on-street parking particularly in residential areas...’. There is little evidence to support this claim and parking provision is one of the most significant factors in people choosing to own a car. This is true across location in London, PTAL, tenure, income, etc. We strongly suggest that this sentence be removed from the supporting text.</p>	<p>existing off-street car parking will be supported and encouraged.’</p> <p>Para. 10.2.2 - We note that the amended wording ‘Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to both minimum and maximum parking standards as set by the London Plan, <u>except where a minimum provision would support additional family housing.</u>’</p> <p>Para. 10.2.7 - We note the amended wording ‘On-site provision of vehicle parking can often overcome some issues with on-street parking particularly in residential areas where on-street parking can result in congestion and hindrance to traffic flow.’ This is an improvement on the previous wording.</p> <p>Para. 10.2.8 We welcome deletion of the final sentence as recommended in our regulation 18 representation.</p> <p>Para. 10.2.9 We recommend that this is redrafted as shown to better reflect the approach to parking in the London Plan ‘Car free developments are those that make no general on or off-site provision for car parking other</p>

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	<p>Para. 10.2.8 – The final sentence of this paragraph should be deleted, to avoid the implication that minimum levels of car parking are required (other than disabled parking): ‘Minimum parking standards must be provided in areas with a PTAL score of 0-1.’ We recommend that the borough clarify that the London Plan requires a minimum number of blue badge spaces within the definition of car-free, however in all other instances, blue badge and other types of parking are as a proportion of the permitted car parking and count towards the maximum allowed.</p> <p>Para. 10.2.11 – We would welcome an illustration of Harrow’s commitment to achieving strategic transport targets for mode shift through the inclusion of a map showing the existing, potential and proposed active transport improvements across the borough. The plans outlined for the Opportunity Areas mentioned in this section would benefit from this in particular. While we welcome the comment on infrastructure supporting mode shift, more detailed plans would provide clarity for the improvements required to achieve the spatial strategy on supporting mode shift to walking, cycling and</p>	<p>than that required to meet the needs of disabled persons. Where located in areas of high public transport accessibility levels (PTAL4-6) and access to services through sustainable transport modes, such schemes are an effective means of delivering a modal shift away from private car use. New development must demonstrate that future occupiers’ ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non residential uses) would not be severely disadvantaged by the absence of car parking. In Harrow, the Harrow & Wealdstone Opportunity Area and town, district and neighbourhood centres with a PTAL of 4-6 provide the most suitable locations for car-free development. They provide occupiers with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere.’</p> <p>Para 10.2.11 We welcome the requirement for development to prioritise walking, cycling and public transport but this approach should not be confined to</p>

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	public transport.	Opportunity Areas and town centres. It should apply to all areas of the borough and the wording amended as shown to reflect this. ‘Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport.’
Policy M3: Deliveries, Servicing and Construction	<p>The policy should provide support for development proposals which facilitate sustainable freight movement by rail, waterways and road where appropriate, in line with Policy T7 of the London Plan. TfL particularly encourage the use of active and sustainable modes of delivery which include cargo bikes and zero-emission vehicles, particularly for last mile deliveries. The use of consolidation facilities should be encouraged including micro consolidation hubs where appropriate.</p> <p>Part A – We support the commitment to reducing trips by freight and delivery vehicles in line with London Plan Policy T2 Healthy Streets and the MTS target of Vision Zero. We would encourage the policy to provide more detail on potential shifts to more sustainable modes of freight and delivery, and time and area restrictions to further work towards these targets.</p> <p>Part B –We suggest the local plan uses the London Plan</p>	<p>We welcome inclusion of the sentence ‘<u>Development proposals which facilitate sustainable freight movement by rail, waterways and road where appropriate, will be supported in line with Policy T7 of the London Plan.</u>’</p> <p>However it would be useful to add ‘including use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movements where appropriate.’</p>

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	<p>terminology of ‘Construction Logistics Plans’ and refers to TfL Delivery and Servicing Plan guidance to facilitate these outcomes.</p> <p>Part C – We encourage the use of zero-emission and more space efficient delivery and freight vehicles where possible (as outlined in part F), for example, the use of cargo bikes for safety and environmental efficiency in line with London Plan policies T2 Healthy Streets and T7 Deliveries, servicing and construction.</p> <p>Part D – We encourage the implementation of time and space restrictions on delivery vehicles to enable more efficient, safe and pleasant delivery and servicing practice across the borough.</p> <p>Para. 10.3.1 – We strongly encourage prioritising the safety of those traveling by active modes. We further support the intention to mitigate and minimise disruption to work to achieve London Plan targets for healthier, safer and more active transport use across the borough.</p>	<p>Part B – We note the amended wording ‘Demonstrating through the submission of a Construction Management/ Logistics Plan Statement <u>(Major applications only)</u>, any impacts on the transport network during the construction phase of the development (including road closures and damage to the transport.’</p> <p>Para. 10.3.1 – We note the additional reference to TfL Delivery and Servicing Plan guidance although this is more relevant to the section on Deliveries and Servicing than Construction Logistics.</p> <p>Para. 10.3.5 – We welcome the addition of the following although we suggest a further amendment as shown ‘Consideration should also be given to the role of, and opportunities for, shared consolidation facilities for deliveries and servicing including micro consolidation hubs as a means of minimising vehicle movements, reducing overall levels of congestion and improving road safety.’</p>
OA1 – Queens	The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone	

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House Car Park	<p>Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons' or operational parking requirements, taking into account overall town centre parking supply. The requirement for re-provision of car parking is inappropriate in this location, would provide a constraint to improving the public realm and would fail to maximise use of a well-connected site within the town centre. Kymberley Road is also an important route for buses with stops and stands including for Superloop services and so any redevelopment of the site should take this into account. The following changes are necessary to ensure soundness and consistency with parking policies and standards in the London Plan.</p> <p>The site objective should be amended to remove reference to re-provision of car parking as follows: 'Deliver a mixed-use development that provides high quality residential homes and appropriate town centre uses [in] the Harrow Metropolitan Town Centre, while ensuring a satisfactory re-provision of car parking spaces.'</p> <p>The allocated use 'Reprovision of carpark spaces' should be deleted.</p> <p>The requirement for 'Car parking re-provision (public and private parking)' should be deleted.</p> <p>In the development principles the following amendment should be made: 'Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking. Re-provision of appropriate levels of car parking (both in relation to supporting new development and wider public car parking provision to serve the town centre) must be demonstrated.'</p>	<p>Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking. Re-provision of appropriate levels of car parking (both in relation to supporting new development and wider public car parking provision to serve the town centre) must be demonstrated.</p>
OA2 – Harrow on the Hill	<p>The sites are owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons' or operational parking requirements, taking into account overall town centre parking supply.</p> <p>The site objective should be amended to refer to TfL's future requirements as shown 'Redevelopment of the site to</p>	

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	<p>provide a landmark / wayfinding development that will deliver housing, town centre uses and an enhanced public transport hub. An enhanced transport hub must deliver greater accessibility (including step free access from the southern entrance of the train station) and ensure transportation capacity is met over the plan period in line with Tfl's future requirements.'</p> <p>The bus station uses should be retained and enhanced and so we welcome references to this in the development considerations. However, we recommend amendments to the wording as shown:</p> <p>The development requirement 'Improved bus station to provide for capacity over the plan period and proposed electrification of the bus fleet' should be amended to read 'Provision of an enhanced bus station to accommodate the future bus network; including capacity for forecast growth and the necessary infrastructure for the zero emission bus fleet.'</p> <p>The development principle 'Redevelopment of the site must ensure a modernised bus station be delivered to ensure sufficient capacity over the plan period and includes the necessary infrastructure for the electrification of the network' should be amended to read 'Redevelopment of the site must ensure delivery of a modernised and enhanced bus station, which meets Tfl's Passenger and Operational Requirements for the future bus network; including capacity for forecast growth and the necessary infrastructure to accommodate the zero emission bus fleet.'</p> <p>In the development considerations we welcome the requirement 'Provision of step free access to the southern side of the Harrow on the Hill underground station.'</p>	
<p>OA6 – Greenhill Way</p>	<p>The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons' or operational parking requirements, taking into account overall town centre parking supply. The requirement for re-provision of car parking is inappropriate in this location and would fail to maximise use of a well-connected site within the town centre. The following changes are necessary to ensure soundness and consistency with parking policies and standards in the London Plan.</p>	

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	<p>The allocated use 'Car parking' should be deleted.</p> <p>The requirement for 'Car parking provision to serve town centre / new development' should be deleted.</p> <p>In the development principles the following amendment should be made: 'Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking Carparking will continue to be required at a level that is supportive of both any new development and for the Harrow Metropolitan Town Centre. New development will have to demonstrate an appropriate level of carparking.'</p>	
OA7 – Tesco, Station Road	<p>The site has a PTAL of 3 -4 with a very small area of PTAL 5 on the site frontage, is on the edge of Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so car parking should be minimised in line with London Plan standards.</p> <p>In the requirements the following amendment should be made: 'Re-provide the existing supermarket with limited car parking in line with London Plan standards to avoid a site that is dominated by surface car parking and sufficient associated parking.'</p> <p>In the development principles the following amendment should be made: 'Improve pedestrian access to the site, and pedestrian links between the site and Harrow town centre. including use of the car park for linked trips.'</p>	
OA11 – Car park, Ellen Webb Drive	<p>The site has a PTAL of up to 6a and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development.</p> <p>The requirement 'Appropriate car parking provision' should be deleted.</p> <p>In the development principles the following amendment should be made: 'Car free development except for disabled persons' or operational parking requirements Carparking on site must be provided to serve any new development with care taken...'</p>	
OA12 – Peel Road	<p>The site has a PTAL of up to 6a and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development.</p> <p>The allocated use 'Car parking' should be deleted.</p>	

Policy/Site	Reg. 18 Comments/amendments	Reg. 19 Updated comments/amendments
	<p>The requirement 'Reprovision of appropriate level of car parking' should be deleted.</p> <p>In the development principles the following amendment should be made: 'Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of district centre car parking. Carparking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Centre. New development will have to demonstrate an appropriate level of carparking.'</p>	
OA14 - Byron Quarter	<p>The site has a PTAL of up to 4 and is within Harrow and Wealdstone Opportunity Area and so there should be a limited amount of car parking associated with any development.</p> <p>The allocated use 'Car parking' should be deleted.</p> <p>The requirement 'Car parking reprovision' should be deleted.</p> <p>In the development principles the following amendment should be made: 'SufficientA limited amount of car parking reprovision should be made within new development to service the Leisure Centre (if retained or re-provided on-site) and other leisure and community uses.'</p>	
GB1 – Royal National Orthopaedic Hospital	<p>The site has a PTAL of up to 1a and there are very limited opportunities for active travel. It is not well located for residential development or access to services and is likely to result in a car dependent development. If the site allocation includes housing as proposed this should be located close to existing bus services on Brockley Hill. The following development principle should be amended as shown 'The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements including active travel routes and access to public transport to improve connectivity & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan.'</p>	
O1 – Waitrose South Harrow	<p>The site has a PTAL of 3 and is close to South Harrow bus and Underground stations and district centre so there should be a limited amount of car parking associated with any development.</p> <p>We note the requirement 'Appropriate level of replacement carparking'. Any car parking should be based on current London Plan standards and not historic provision.</p>	

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	In the development principles the following amendment should be made to ensure consistency with the London Plan and to reflect the site's potential for a car free residential development taking account of the PTAL of 3 and the proximity to shops and services in South Harrow.' An appropriate level of carparking in line with London Plan standards must be provided to continue to serve the Waitrose superstore and also for any residential development.'	
O3 - Northolt Road Nursery and Carpark at rear of 27 Northolt Road	The sites have a PTAL of 4 and are close to South Harrow bus and Underground stations and district centre so there should be a limited amount of car parking associated with any development. The requirement ' Provision of appropriate level of car parking ' should be deleted as shown. Residential development in this location should be car free and any car parking associated with a re-provided nursery should be limited to disabled persons' parking or for operational needs. In the development principles the following should be deleted as shown because there should be no requirement in this location to retain, re-provide or relocate car parking ' Development of the car park should be accompanied by an assessment of parking need which demonstrates that an appropriate level of parking is being retained, re-provided on site or relocated.'	
O7 – Rayners Lane station car park	The site is owned by TfL and so a separate response will be submitted by Places for London. The site has a PTAL of 4 - 5 and is adjacent to Rayners Lane Underground station and district centre so any development should be car free to ensure consistency with the London Plan. The site objective should be amended as follows: 'Mixed-use development which improves access to Rayners Lane Station, while retaining or re-provided a sufficient level of car parking.' The allocated use ' Car parking ' should be deleted as shown. The requirement 'Re-provision of an appropriate level [of] station car-parking for disabled persons to help meet need generated by commuters and in connection with major events at Wembley Stadium.' should be amended as shown. In the development principles the following should be deleted as shown because there should be no requirement in this location to re-provide car parking. ' Any planning application for the redevelopment of the site should be	

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		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.'
O12 – Hatch End Telephone Exchange	The site has a PTAL of 2, forms part of Hatch End local centre and is close to Hatch End Overground station. The requirement for an appropriate provision of car parking should be deleted because car parking should be provided in line with Policy M2 and London Plan parking standards. There should be no need for additional car parking to serve the local centre which has a local catchment that enables people to walk or cycle. In the development principles the following should be deleted as shown ' An appropriate level of car parking should be retained, reprovided on site or relocated as part of development in order to meet the need generated by development as well as for the broader town centre. '	
O20 – Canons Park station car park	The site is owned by TfL and so a separate response will be submitted by Places for London. The site has a PTAL of 2 – 3 and is adjacent to Canons Park Underground station, Due to the proximity to the station it is suitable for a car free residential development. The site objective should be amended to read 'Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking. ' The allocated use ' Car parking ' should be deleted as shown. In the development principles the following amendment should be made: 'The site is suitable for partial residential development with retention of an appropriate amount of station car parking for disabled persons to help meet demand generated by commuters. 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 retention or re-provision of car parking capacity on the site or elsewhere. '	
O21 – Anmer Lodge	The site has a PTAL of 2 – 3 and is located within Stanmore District Centre. It provides an opportunity to replace car parking with more productive uses that enhance the district centre. The site objective should be amended as shown: 'Mixed-use development of this under-utilised town centre site which includes a supermarket as well as a suitable level of residential use, while replacing car parking. ' The allocated use ' Car parking ' should be deleted as shown.	

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	In the requirements the following amendment should be made	<p>‘Appropriate level of replacement A limited amount of public car parking for the town centre.’</p>
O22 - Stanmore station car park	<p>The site is owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 2 – 3 and is located adjacent to Stanmore Underground station. Due to the proximity to the station it is suitable for a car free residential development. The site objective should be amended to read ‘Housing development which improves access to Stanmore Station, while providing a sufficient level of car parking.’</p> <p>The allocated use ‘Car parking’ should be deleted as shown.</p> <p>In the requirements the following should be deleted ‘Reprovision of suitable level of car parking for commuters and in connection with major events at Wembley Stadium.’</p> <p>In the development principles the following amendments should be made ‘The site is suitable for partial residential development with reprovision of an appropriate amount of station car parking for disabled persons. 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>	