

CITY PLAN 2019 – 2040

PARKING
EVIDENCE TOPIC PAPER
JUNE 2019

Executive Summary

City Plan 2019-40 sets out the council's strategy for a cleaner, safer, city that will offer a better quality of life for all. Westminster is a dense, urban environment where commercial and business needs have to be carefully balanced alongside the needs of our residential population. With space in the city already at a premium, and growth set to continue, parking policy must take a pragmatic approach to both current and future challenges.

As a starting point, we assessed findings from the Parking Occupancy Survey (2019). Overall it was found that whilst there is sufficient on-street parking to meet demand in most of the city, high-pressure exists in some parking zones. Westminster is also in the somewhat unique position of parking demand being as high on Sundays as any other day of the week. The issue of space in the city is further compounded by our strategic objective of sustainable growth. If we look at current parking provision against our housing growth targets - particularly in Opportunity Areas – it was clear that parking policy needed to balance both current and future need without putting any undue additional pressure on the stress areas already identified.

Our revised policy has also had to take into account objections raised during the informal consultation on the City Plan. A key concern was that our maximum parking standard was at odds with that in the Draft London Plan. However, on balance we found that the London Plan's 'car free residential' standards are not appropriate for the whole of Westminster. In existing areas of parking stress this would not be practical, or indeed viable, as increased housing delivery will up demand even further; the pragmatic response would be to incorporate 'on-site' provision, for example by incorporating basement car parks in developments. Through an evidenced-based approach we have put forward a compromise whereby we will the adopt the London Plan parking standards throughout most of the borough – with a localised parking policy in place in key stress areas.

It is important to recognise that whilst living in Westminster offers a myriad of benefits, as with any dynamic city it can also be an intense place to live. Part of the remit of the Plan is to build strong, cohesive communities where families want to stay long-term. While we seek to reduce the number of cars on our streets over the coming years there is still a role for them. They can be convenient, particularly for those with young children, larger families or for people who are less able. As such, parking provision will be allowed in new developments geared towards young families in Parking Zones B and F.

We are also acutely aware that air quality is the number one concern for Westminster's residents. It is also one of ours: Creating a Healthier and Greener City has been set out as one of the council's five key priorities in the City for All 2018/19 corporate strategy. With sustainable travel a key priority, we have in fact assigned higher provision of electric vehicle charging points than the Draft London Plan sets out. We will continue to support greener travel and have pledged our commitment in the forthcoming Westminster Electric Vehicle Strategy.

Overall, parking policy within the draft City Plan is in general conformity with the London Plan. Any deviations have been in response to evidence-based findings which have directed

us towards more localised solutions. This approach conforms to NPFF guidance which supports local policy when backed by evidence.

As the findings in this report show, there is justifiable evidence to fully support the direction we have taken.

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1. Introduction

The purpose of this paper is to provide additional background, information and justification to the parking policy in the City Plan 2019-2040. The parking policy has been amended following informal consultation on the plan in 2018, which attracted objections with regards to the conformity with the draft London Plan¹.

In terms of the City Plan's strategic objectives, the revised parking policy has cross cutting implications and impacts upon the following policies in particular:

- Policy 25 Sustainable transport
- Policy 26 Walking and cycling
- Policy 27 Public transport and infrastructure
- Policy 29 Highway access and management
- Policy 44 Public realm

This approach and the resultant standards detailed in Policy 28 and Appendix 2 of the City Plan have been designed to respond to Westminster's particular characteristics and associated evidence base. On that basis the policy proposes a localised approach to parking which advocates car free residential developments across Westminster except in parking zones B and F.

This paper demonstrates that whilst this policy departs from the Draft London Plan, it is an evidence-based departure and is in general conformity with this document. On that basis it complies with national, London-wide and local policy and is supported by robust evidence.

¹ The previous draft parking policy consulted on in November 2018 can be found in Appendix D.

2. Policy context

The City Plan parking policy relates to the following national, regional and local policies and documents:

National

National Planning Policy Framework (NPPF)

- 2 Achieving sustainable development
- 3 Plan making
- 9 Promoting sustainable transport
- 12 Achieving well designed places

Regional

- Draft London Plan
 - Policy D6 Public realm
 - Policy T2 Healthy Streets
 - Policy T3 Transport capacity, connectivity and safeguarding
 - Policy T5 Cycling
 - Policy T6 Car Parking
- Mayor's 2018 Transport Strategy
- Mayor's Healthy Streets Framework
- The London Vision Zero Action Plan (July 2018)
- The London Cycle Action Plan (December 2018)
- The London Walking Action Plan (2019-2040)

Local

- Westminster City For All 2018/19 strategy
- Westminster's Local Implementation Plan 2019/20 to 2021/22 (LIP)
- Westminster Air Quality Manifesto 2018
- Westminster Walking Strategy 2017 - 2027

3. Evidence base

The evidence base supporting this policy includes Westminster's *2019 Parking Occupancy Survey*². This Survey supports the Westminster 2019/20 to 2021/22 LIP and the City Plan's Sustainable Travel objectives which are to:

- Deliver sustainable development for growth
- Deliver safer roads for us all
- Deliver better air quality for future generations
- Prioritise the transport network for pedestrians
- Promote better health and inclusivity
- Deliver a sustainable future network
- Implement the 'pay for your impact' principle

The *2019 Parking Occupancy Survey* states that despite measures taken by Westminster Council to reduce car ownership such as the promotion of car clubs and the uptake of electric vehicles, parking stress on Westminster's street network still exists in some zones. The survey concludes that:

- On-street parking stock still continues to meet demand for parking, loading and waiting overall.
- Serious parking pressure persists on resident parking spaces in a number of Sub Zones, especially in Zones F (Marylebone and Bayswater); and B (Marylebone, Maida Vale, North Bayswater, Paddington) (see Map 1 in Appendix A).
- The majority of Zones B and F have a PTAL rating of 6B meaning that public accessibility levels are at their best (i.e. highest).
- Weekend parking occupancy, especially on Sundays, continues to attract as many vehicles as weekdays - a position that distinguishes the City of Westminster from many other urban parking authorities across the country.
- Other Zones such as Zone C also experiences pressure on resident parking bays as does 'pay to park' for bays in Zone E.

² A copy of this report can be supplied upon request to the Council's Highways Team.

4. Rationale

As a fundamental element of the evidence base, the draft City Plan parking policy responded to the findings in the 2019 Parking Occupancy Survey and the overarching conclusion that on street parking space in Westminster was and is a finite resource and contains particular parking zones under considerable pressure resulting in kerbside stress. These findings were then framed against Westminster's housing growth targets and the location of this growth.

Through an understanding of these drivers it became clear that Westminster required a parking policy that would not exacerbate the condition of areas of parking stress or negatively impact upon the delivery of the sustainable travel objectives noted above. These objectives required (although not exclusively) the more efficient use of space through a planned programme of new public realm projects and measures to improve levels of air pollution.

In addition, the new City Plan had to respond to the parking policy soundness issues and objections to the parking policy raised by the Mayor of London and Lambeth Council during the City Plan's informal consultation in November 2018. These comments and objections focused on, but were not limited to, the policy's maximum parking standard and their non-conformity with Draft London Plan policy, its negative impact on the City Plan objective to provide better environments for walking and cycling, the detrimental impact this policy would have on the economic viability and vitality of the CAZ together with the additional level of trips through Lambeth this would generate from Westminster.

The council agreed, on the basis of these comments and a review of the new evidence, that a revision to the draft parking policy was required. However, given the evidence, adopting the car-free approach to parking (including its standards) set out in the London Plan across the whole of Westminster was considered to be an unsustainable, unsuitable and unsound solution. The council therefore developed an evidence-based departure from the London Plan in the form of a localised parking policy, which is considered to be in general conformity.

5. Approach

The most appropriate approach to provision of parking within the city is considered to be one that functions on two levels:

- an overarching car free parking policy that covers most of the borough (thereby conforming with Draft London Plan standards); and
- a localised parking policy that accurately reflects the existing parking stress, particular characteristics, drivers and likely location of future development. Thereby this represents an evidence-based departure from the London Plan which leaves this policy in *general* conformity.

The evidence for a localised parking approach within Westminster should be read cumulatively and is summarised in the points below:

- Parking Stress levels exist within Westminster's parking zones B and F and are most acute within areas of high PTAL (see Appendix A).
- The levels of parking stress are most acute in and around the Paddington Opportunity Area where a significant portion of Westminster's growth is targeted (Zone B on the Map in Appendix A).
- Zone B is separated from Westminster's main parks and areas of open space and in some instances, cars can help improve accessibility to these areas particularly in terms of access for young families.
- A demographic imbalance exists within Westminster in terms of the number of families living in the city. In Zones B and F for example, households contain primarily between 11% to 16% of dependent children, whereas the national proportion of dependent children within an area is 29% and within London 31%. A central principle of the emerging City Plan is to encourage mixed and sustainable communities. Having access to a car, particularly for young families, provides an option on transport mode;
- Exacerbated by parking stress levels, kerbside space within Westminster is at a premium and as such cleaner travel measures and those promoted by the GLA such as electric charging points along with public realm improvements projects areas are more challenging to deliver.
- Westminster's LIP states that air quality is the number one concern for Westminster's residents. As a result, creating a healthier and greener city is one of the council's five key priorities, as set out in our *City for All 2018/19* corporate strategy.
- Associated with the LIP is the Air Quality Manifesto which was published in Spring 2018 and this set out 10 key priorities for action. Of particular relevance are Priorities 2 and 3 which urge the exploration of options to discourage car ownership and usage through amended resident parking permit policies and to continue to invest in low emission Electric Vehicle charging infrastructure.
- Westminster has a housing target to create 22,222 extra residential units over the plan period – much of this growth will take place in and around Paddington as evidenced the key development site locations shown on the map in Appendix A. Car ownership across Westminster is such that 37% of households currently have access to a car (see Appendix C). Although car

ownership levels are falling, it follows that without changing anything we are likely to have to accommodate over 10,000 more cars by 2040– all of which would be seeking to park on-street, where there is not enough space unless a localised policy approach is adopted.

In light of the above it was determined that providing on site residential parking in zones B and F where most housing growth is likely to take place was a pragmatic response to a situation that requires improvement to Westminster's public realm and air quality, whilst also helping to create a more mixed community and the promotion of sustainable transport measures.

6. Electric Vehicle Charging Points

Although through the Council's Local Implementation Plan, we have been keen to improve access and safety for alternatives to the private car especially by walking, cycling and using public transport there remains a need to encourage residents and visitors who still drive to exchange their petrol and diesel cars for zero emission Electric Vehicle (EV) or EV/Petrol hybrid alternatives.

From as long ago as 2004 the City Council has consistently developed an on-street offer to the EV driver through the implementation of EV charging points on the street at selected locations. As a result, the City Council's reach to the EV driver has widened and the outgoing LIP2 programme had enabled the successful implementation of 25 new charging points across the city serving 44 dedicated Westminster Car Club bays, where its partner Zipcar has introduced a fleet of EV Volkswagen Golfs for use across central London and beyond.

As a result, the current parking policy exceeds the draft London Plan standards for EV charging points. This emphasis on EV charging points and the positive effect this has on objectives such as improving air quality is continued in the new LIP and through the anticipated commitment to this transport mode in the emerging Westminster Electric Vehicle Strategy.

7. Justification

Justification for a localised policy that responds to the particular characteristics of Westminster can be found in the NPPF. The following underlined text supports a localised approach to planning policy when supported by evidence.

- Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (*paragraph 9 Achieving sustainable development*).
- Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision (*paragraph 20 Plan making*).
- Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making (*paragraph 102-3: Promoting sustainable transport*).

- Planning policies and decisions should ensure that developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit (*paragraph 127 Achieving well designed places*).

8. Conclusion

The City Plan parking policy departs from the Draft London Plan standards in that the parking standards in Appendix 2 of the City Plan will apply to all development except in parking zones B and F where the following maximum residential standards will apply:

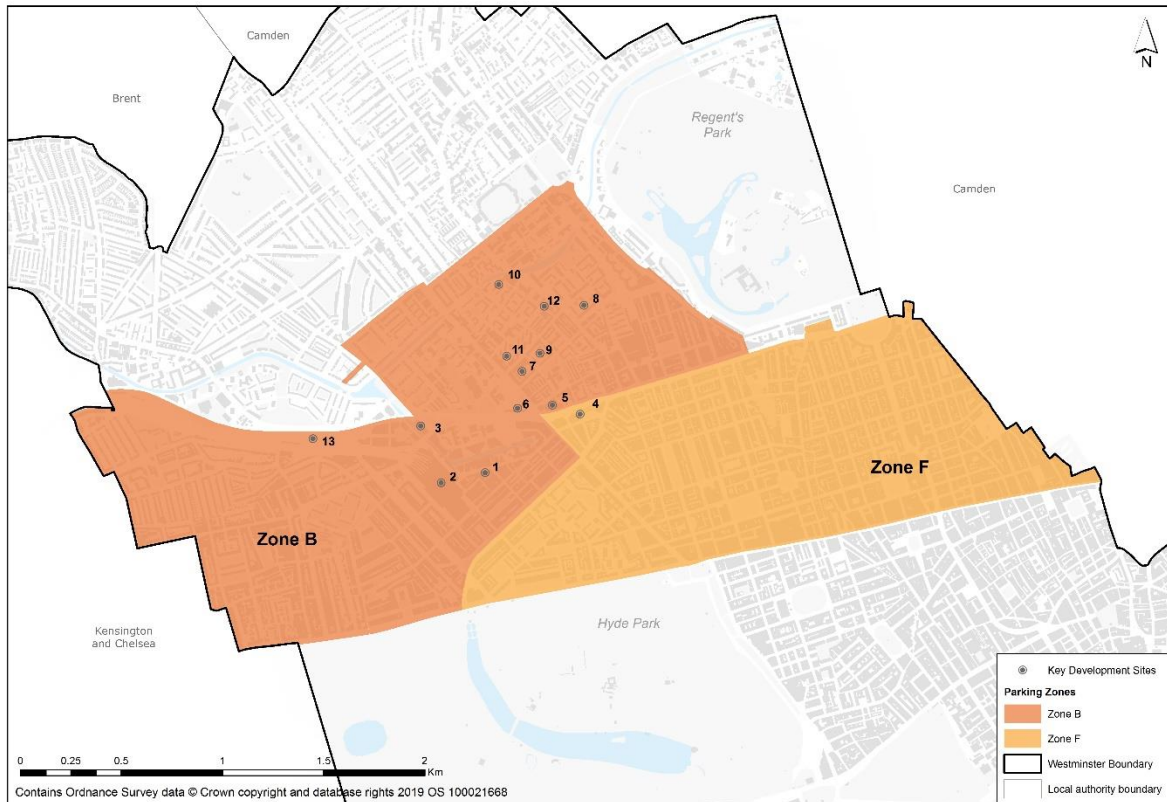
1. Up to 0.4 spaces per residential unit and clause B and D to H of Draft London Plan policy T.6.1 detailed in Appendix 2 of the City Plan.
2. 50% of these spaces should provide active provision for electric charging vehicles while the remaining spaces should incorporate a passive provision.

In zones B & F where on-site parking is delivered applicants will:

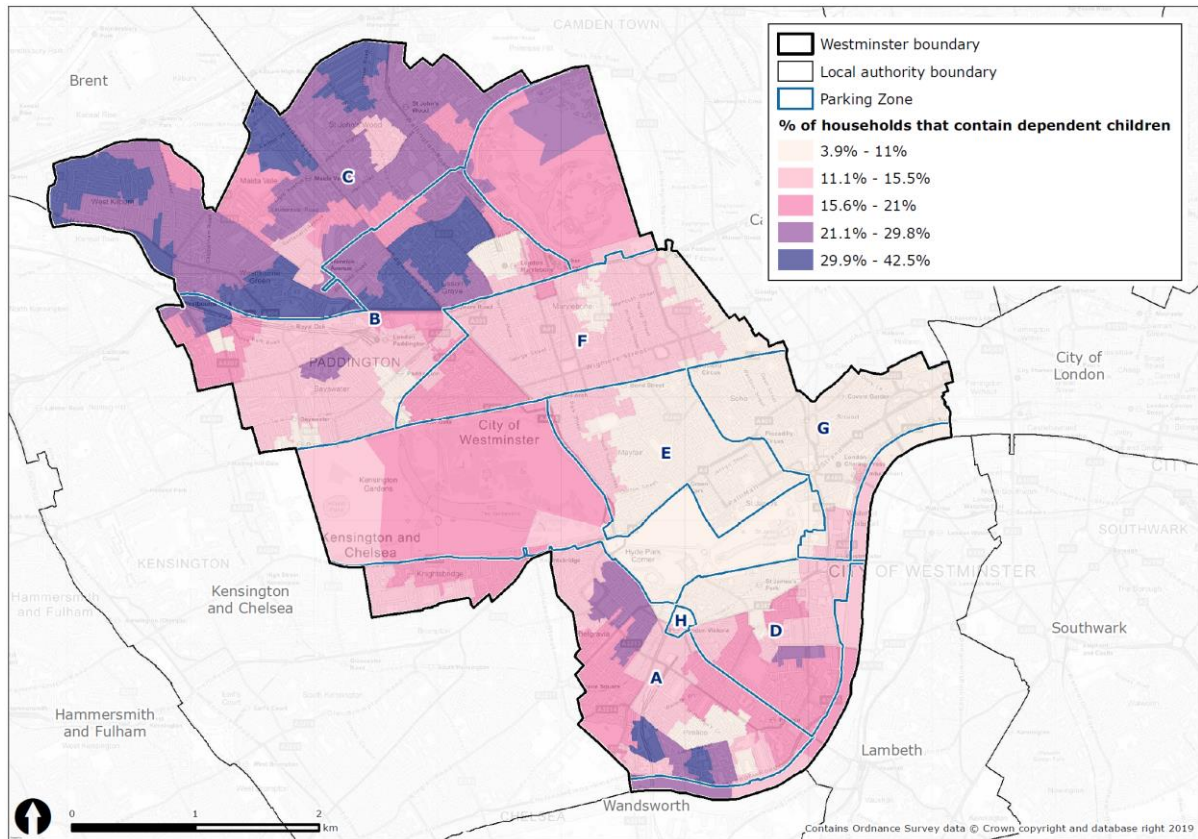
1. provide car club membership for all residents and provision of car club spaces;
2. ensure that all outdoor and open parking areas are designed to a standard which accommodates the need for safe pedestrian and vehicle movement and creates permeable links through the site; and
3. prioritise the issue of parking spaces within development to families with young children.
4. let, rather than sell, parking spaces to new residents on a short-term basis.

In summary, this approach accords with the both the supporting evidence base, such as Westminster's LIP, and the NPPF which states that local circumstances should be taken into account when formulating local plan policy in order to contribute to the achievement of sustainable development; and it is in general conformity with the London Plan.

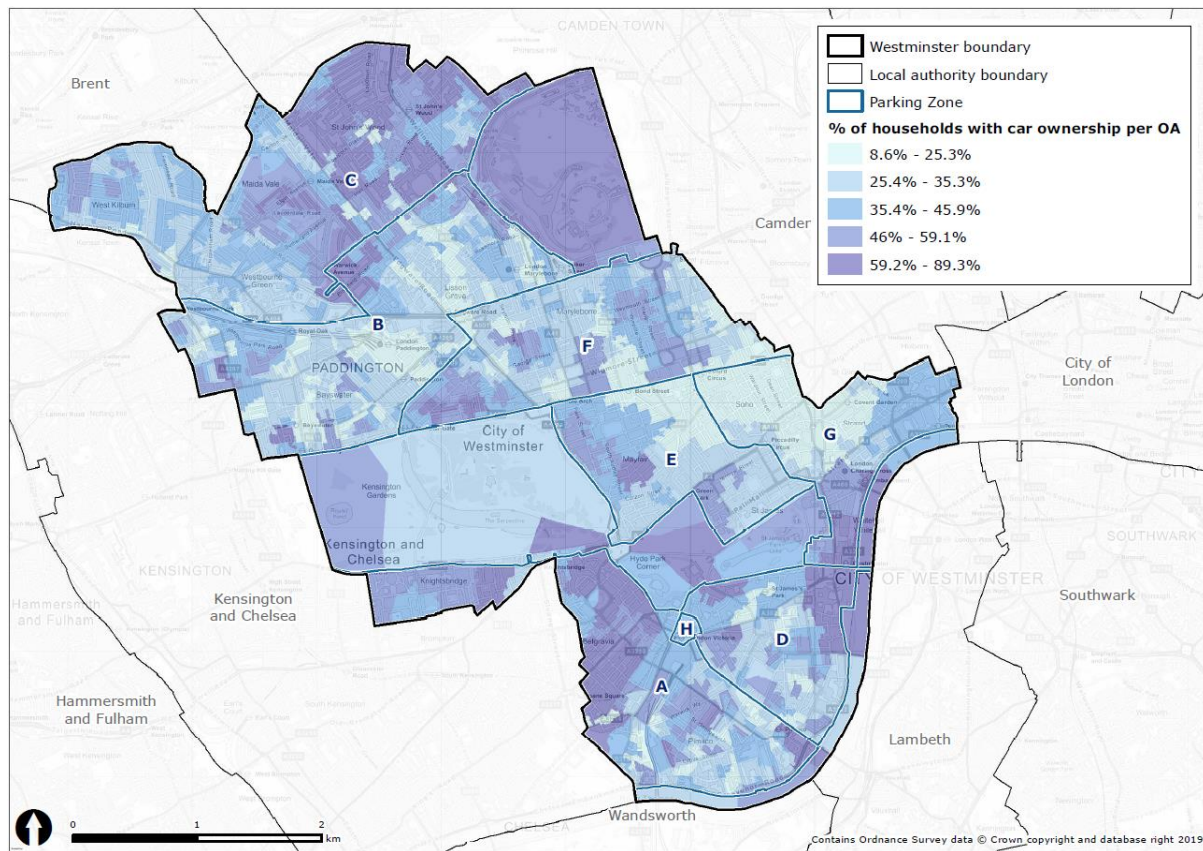
9. Appendix A Key Development Sites overlaid unto Westminster's Parking Zones



10. Appendix B Demographic Imbalance Map – proportion of families within Westminster



11. Appendix C: Car ownership levels in Westminster



12. Appendix D City Plan 2019-2040 parking policy as informally consulted on in November 2018

Background

The draft City Plan parking policy consulted on informally in November 2018 did not advocate the principle of car free development on new residential sites within areas of high PTAL and therefore drew criticism that it did not conform with either current or Draft London Plan's parking policy.

It is a fundamental principle of the current and Draft London Plan to reduce car use and promote sustainable transport measures. As a result, car-free development is considered to be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport; although it is noted that local considerations such as the conditions for walking and cycling are taken into account.

The entirety of Westminster except for areas incorporating Regent's Park and Hyde Park/Kensington Gardens and isolated areas around West Kilburn and Pimlico have the highest levels of PTAL (4,5,6). The City Plan's principle point of departure from the draft London Plan in terms of parking provision are the differing standards with regards to parking space provision in new developments.

It should be noted that the standards were maximum standards.

Informal draft City Plan parking policy (November 2018):

28. Parking

PARKING STANDARDS

- A.** New development must meet the parking standards set out in Appendix 2. Additional parking in front gardens will not be permitted.

RESIDENTIAL DEVELOPMENT WITHOUT CAR PARKING

- B.** Where residential development is proposed without car parking, it must:
1. not create or exacerbate an area of parking stress³; and
 2. demonstrably support implementation of other policies in this plan, in particular the delivery of affordable housing.
- C.** Where major development is proposed without car parking, appropriate mitigation of the potential impact of additional vehicles being parked on-street will be required, including full provision of sustainable transport infrastructure in accordance with other policies in this plan, and / or the provision of long-term alternative parking provision in the vicinity of the development.

³ Parking stress areas are places where 80% or more of on street parking spaces are occupied during the day or at night, in compliance with any restrictions that exist

CAR CLUBS AND CAR SHARING

- D.** The implementation of car club and sharing schemes throughout Westminster will be supported where this will result in a reduction in parking stress, car ownership levels and trips by private motor vehicles.

ON-STREET PARKING

- E.** The loss of on-street parking will not be permitted, unless demonstrated to be surplus to requirements, and that the proposal facilitates other sustainable transport measures.

OFF-STREET PARKING

- F.** Development of new off-street car parking for use by the public (temporary or permanent) will only be acceptable where this would wholly or partly replace an existing facility. When assessing proposals involving the loss of public off-street parking, the council will give particular consideration to:
1. the need to reduce traffic levels and encourage more sustainable modes of transport and deliveries / servicing; and
 2. the average and peak usage of the car park.

G. Additional off-street non-residential parking will only be acceptable where there is an essential demonstrated operational need. The council will encourage the use of any surplus parking areas in non-residential sites to support other sustainable transport modes, freight consolidation or for other uses that do not result in an increase in congestion.

Parking Standards

28.1 / Our approach to residential car parking conforms to the London Plan principle of balancing new development with the prevention of excessive car parking that undermines cycling, walking, and public transport use. Appendix 2 sets out maximum parking standards, which take into account existing levels of car ownership, existing on-street parking stress levels, and the high level of public transport provision in Westminster, in accordance with the NPPF. The standards also set out the requirements for electric vehicles to encourage use of new technologies, minimum requirements for cycle parking provision, and requirements for disabled and car club spaces.

28.2 / The conversion of front gardens for use as parking areas will be resisted as it is detrimental to local character and reduces biodiversity by removing green spaces for nature. Parked vehicles

provide a range of vehicle types and sizes, including low emission and family-sized vehicles. This can help broaden the appeal of membership to a range of households. Doing so can improve take-up thus reducing demand for car ownership and reducing parking stress.

On-street parking

28.8 / On-street parking is a limited resource and demand often exceeds supply in many parts of the city, meaning that the loss of such space will not normally be supported. On-street parking spaces can cater for a wide range of users including residents, short stay (visitor) parking, and to facilitate loading and servicing requirements at various times of the day. Balancing these needs requires careful management, and we will therefore work with the full range of user groups to ensure their needs are met as far as possible. This could include reviewing existing parking zones and controls as circumstances change over the plan period.

28.9 / Given the increasing demand on kerbside space in the city, proposals seeking exclusive access to the kerbside through measures such as dedicated parking bays, permits or Parking Identifier Boards for exclusive parking will be resisted. This will ensure the free-flow of vehicular traffic, and allow all users of the highway to access the kerbside in compliance with existing restrictions. Exceptional circumstances such as an overriding national security, NHS or other emergency services need, or where it can be demonstrated that any restrictions will not adversely impact

at the front of properties can clutter the street scene and potentially pose a hazard to pedestrians where parked vehicles overhang the footway.

Residential development without car parking

28.3 / Given the high levels of public transport provision and access to jobs, leisure and shopping facilities in Westminster, there may be instances where it is not necessary to provide on-site parking. Nevertheless, there will always be a need to ensure that a lack of provision does not result in significant increases in demand for on-street parking in the vicinity of the development, leading to increased congestion, disruption to traffic flow, air and noise pollution, poor parking practices, and adverse impacts on the amenity of residents. To ensure this is the case, developments without parking provision should not create or exacerbate areas of parking stress. The parking stress level in the local area should remain below the defined threshold of 80% of on-street parking spaces being occupied during the day or at night, in compliance with existing parking restrictions.

28.4 / Transport assessments / statements for proposed developments without parking provision should explore the issue of parking stress, and include an analysis of existing levels of parking stress in the vicinity and of anticipated levels of car ownership. They must also take account of location, housing type and tenure mix, and proposed sustainable transport measures such as provision for cycling and car clubs.

on traffic flow, highway safety or parking conditions, will be considered on a case-by-case basis. If granted, such concessions will be regularly reviewed.

Off-street parking

28.10 / The creation of additional off-street public parking can undermine efforts to encourage use of more sustainable modes of transport, which is necessary to reduce congestion, and improve air quality and road safety. New parking provision for the public should therefore only be made where it is replacing existing off-street public parking, and should include provision for disabled person's parking, as well as car club spaces and cycle parking to encourage more sustainable travel choices.

28.11 / Westminster is well served by public transport, with all commercial areas and visitor attractions accessible by tube, rail, or bus. The provision of additional off-street non-residential parking can encourage unnecessary car trips, counter to the aims of promoting a modal shift. It can also cause pedestrian safety concerns, as footway space is lost to form access to off-street parking. New off-street, non-residential parking is therefore strongly discouraged.

28.12 / There are some exceptions where the essential operational needs of the proposed use may require dedicated off-street parking. Such uses include hospitals, medical centres, and the key emergency services. In addition, hotels, leisure, entertainment, and education uses can increase

28.5 / Where a development proposal would demonstrably support implementation of other policy objectives in the plan, particularly delivering fully policy compliant levels of affordable housing, the provision of no on-site car parking may be preferable in order to make the most efficient use of the site and to ensure the delivery of affordable housing. Individual site constraints may mean that the provision of car parking may result in a less efficient use of land and / or be so costly to provide that it could prejudice the provision of affordable housing at the required level.

28.6 / It is expected that major schemes (i.e. 10 or more dwellings) will normally require some form of dedicated parking provision. Where this is not proposed, appropriate mitigation measures will be required, such as the fully policy compliant delivery of sustainable transport infrastructure to encourage modal shift, including cycle parking, cycle hire facilities and electric vehicle charging provision, and / or the provision of long-term alternative parking in the vicinity, dependent on the location of the development.

Car clubs and car sharing

28.7 / The use of car clubs can contribute to a reduced need for car ownership and hence reduce parking stress, and as such they are encouraged. Care is needed to ensure that car club usage replaces trips by private motor vehicle, rather than walking, cycling or public transport. Where provision is made for car clubs, they should

demand for coaches, minibuses or taxis, and parking facilities. Meeting the needs of these vehicles should be considered although parking should only be provided where it is needed for the essential operation of the use.

Appendix 2: Parking Standards

Where parking is provided in accordance with the standards below, spaces will be reserved for the sole permanent use of residents of the development, with spaces allocated to individual addresses or property numbers.

Housing type / size	Maximum spaces per unit (average)
2 bedrooms or less	0.5 spaces
3 bedrooms or more	1 space

Type of parking	Provision required
Electric Charging Facilities	A least 50% active provision, with passive provision for remaining spaces

Disabled parking and motorcycle / moped parking should be provided in accordance with the London Plan standard.

Car clubs

Where parking is provided, free membership to a Carplus accredited car club will be secured for the occupiers of all residential units who qualify for 25 years. The demand for car club bays arising from this requirement should be assessed as part of the Transport Assessment or Statement. If necessary, off-street parking will be provided by the developer in a publicly accessible location.

Non-residential parking for disabled persons

Disabled parking for non-residential uses should be provided in accordance with the London Plan standard.

Cycle parking

Minimum cycle parking should be provided in accordance with the London Plan.

Cycle facilities

Showers, changing facilities and lockers should be provided for cyclists at all new workplaces, hospitals and health facilities, and places of further and higher education. At least one shower will be installed for every 20 cycle parking spaces provided (with a minimum of one shower), and one locker will be provided per cycle space. These facilities will be conveniently located in relation to the cycle parking spaces and accessible to all staff (and students where applicable).

CITY PLAN

2019 – 2040



City of Westminster