

CITY PLAN 2019 – 2040

SUSTAINABLE TRANSPORT TOPIC PAPER

NOVEMBER 2019

1. Introduction

- 1.1. Westminster City Council is preparing a new City Plan 2019-2040 which sets out the council's vision to make Westminster a city of excellence in all areas. The purpose of this topic paper is to demonstrate how the policies relating to Sustainable Transport in the City Plan have been developed and evidenced. This topic paper relates to the following City Plan policies:

Policy 25	Sustainable Transport
Policy 26	Walking and Cycling
Policy 27	Public Transport and Infrastructure
Policy 28	Parking
Policy 29	Highway Access and Management
Policy 30	Freight and Servicing
Policy 31	Technological Innovation in Transport
Policy 32	Waterways and Waterbodies

- 1.2. This paper will set out the following:

- The purpose and intention behind the policies
- The evidence in support of the policies
- The rationale and key issues of relevance for the policy areas
- Matters arising from the consultation responses received
- Any other relevant details about how the policies have been developed.

2. Evidence Base Overview

2.1. Policies

- 2.1.1. This topic paper pertains to the City Plan policies concerning all aspects of sustainable transport, as listed above.

- 2.1.2. The collective purpose of the draft City Plan's sustainable transport policies is to ensure that the council will support a pattern of development which drives modal shifts to more sustainable means of transport, thereby delivering a range of benefits for individuals, communities and the environment. The core objectives of these policies are perhaps best summarised in context with the strategic aims of [Westminster's Local Implementation Plan \(2019/20 – 2021/22\)](#), which are:

- Deliver sustainable development 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

- 2.2. With these objectives in mind, Policies 25-32 of the draft City Plan seek to ensure that development makes a positive contribution to improvement of public transport, promotion of sustainable modes, and the reduction of the dominance of private motor vehicles. All this with a view to improving health and wellbeing as well as environmental outcomes.

- 2.3. The aim is to achieve these outcomes with and for the approximately 850,000 people who travel into and around Westminster on a daily basis, while also maintaining and enhancing Westminster's places as some of the most attractive and liveable in London, for the city's residents.

3. Our Policy in Context

3.1. Evidence Base Review

- 3.1.1. A variety of evidence sources were used to develop the sustainable transport approach in Westminster's City Plan policies. National, regional and local sources were all used, and the council looked to planned and existing initiatives and engagement with a range relevant authorities to gather a robust basis of evidence. The details of this are explained below.
- 3.1.2. Sustainable transport is an important and increasingly pressured policy area at a local, national and global level. Cities consume two-thirds of global energy and are responsible for over 70% of total worldwide CO₂ emissions. Transport infrastructure directs and determines the spatial structure of cities. It is clear, then, that policies and strategies which help to determine the way in which people move into and around a place like Westminster will have far-reaching implications for broader environmental outcomes.
- 3.1.3. Public and political engagement around environmental issues and climate change has dramatically increased in recent years. Publication of the Intergovernmental Panel on Climate Change (IPCC) report in November 2018 triggered a further spike in interest. That report outlined the need to rapidly accelerate actions to cut carbon emissions, highlighting associated impacts on climate, ecology and global health. In September 2019 Westminster became one of around 200 local authorities to have declared a Climate Emergency, and it committed to becoming a zero-carbon city by 2050.
- 3.1.4. Sustainable transport has an important role to play in achieving this commitment. World Health Organisation data indicates that transport accounted for 23% of global carbon dioxide emissions in 2010, and in London specifically road transport is by far the greatest source of airborne NO_x and PM₁₀, contributing 50% of the total volumes¹. At the time of publication of the report, a quarter of that 50% was made up by diesel cars alone. The impact of private transport choices on air quality has been recognised and is targeted by a number of national and regional programmes and initiatives such as Westminster's own Don't Be Idle campaign². Many are directly relevant to Westminster, including the Mayor of London's implementation of an Ultra Low Emissions Zone (ULEZ), covering the same area as the Congestion Zone. Vehicles which do not meet stringent carbon emissions limits are subject to a charge. This is part of an overall drive to change behaviour in relation to travel options. Much of the City of Westminster is covered by the ULEZ.
- 3.1.5. However, the evidence shows us that behaviour change is only part of the equation. Our transport infrastructure, including public transport, needs to be effective, appealing and fit for purpose, to accommodate those desired changes in behaviour

¹ [Demystifying Air Pollution in London](#) – full report (London Councils, 2018)

² www.westminster.gov.uk/dont-be-idle

and to handle shifts in demand. Meanwhile we must ensure that the public realm develops in a manner that is complementary to our sustainable transport goals. We want to provide a high quality street environment which delivers visual amenity and protects Westminster's unique character, to incentivise and reward choices such as walking more. All these elements need to pull together to drive the necessary changes towards more sustainable travel, which we will need in order to meet the targets of the Mayor's London Transport Plan and our own strategic aims. The policies of the draft City Plan are intended to underpin this blended, holistic approach.

4. Relationship to London Plan and National Policy

4.1. National Policy

4.1.1. The central requirement of local plans under the NPPF is to deliver "sustainable development" which explicitly includes the need to promote sustainable transport. 'Sustainable transport' is defined in the NPPF glossary as: *"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport."* It is handled in detail in [part 9 of the NPPF](#) (paragraphs 102 – 111). This section requires that transport issues are considered from the earliest stages of plan making. This is so that consideration can be given to the impact of development on transport networks; changing transport technology and usage; opportunities to promote walking, cycling and public transport; environmental impacts of traffic and transport infrastructure; and making high quality spaces that accommodate patterns of movement³. Subsequent paragraphs address some of the more detailed points including parking (paragraph 105), promoting sustainable transport modes (paragraph 108), retaining highways safety (paragraph 109) and the concept of pedestrian and cycling priority (paragraph 110). The City Plan seeks to address the NPPF requirements comprehensively, with dedicated policies for the range of sustainable transport modes, also looking at associated issues such as parking, freight, and the use of technology in transport, all of which additionally impact on sustainable transport outcomes.

4.2. Regional Policy - Emerging London Plan

4.2.1. The draft new London Plan (2019) is the Statutory Development Strategy for Greater London and, in its handling of issues relating to sustainable transport as in all areas, the Westminster City Plan should be in general conformity with it. The new London Plan works in concert with the Mayor's Transport Strategy for London (2018). A key objective within that plan is that, by 2041, 80% of all trips in London should be made by foot, cycle or public transport. Westminster's alignment with this aspiration is reflected in several places within the City Plan. Just as an example, the council aims to *"create an environment where people actively choose to walk and cycle"* (Policy 25 C) and *"seeks better connectivity, legibility, quality, usability and capacity in public transport"* (Policy 27 A). As outlined further below, this feeds into the council's [Walking Strategy for Westminster](#).

4.2.2. Recognising the impact of sustainable transport on not only environmental concerns but also individual health, Policy 25 (section C) of the draft City plan explicitly references '[Healthy Streets](#)' – a policy approach which focuses on creating streets that are pleasant, safe and attractive, where noise, air pollution, accessibility and lack of

³ [National Planning Policy Framework, paragraph 102](#)

seating and shelter are not barriers that prevent people - particularly our most vulnerable people - from getting out and about. It is a key element of the Mayor's transport vision and also features in the new London Plan. The City Plan policies as drafted connect with many aspects of Healthy Streets concept, promoting positive outcomes in relation to physical activity, wellbeing, air quality and congestion. The overarching aim is to act on the principles of Healthy Streets, seeking to make Westminster's communities "*greener, healthier and more attractive places in which to live, work or visit*". This fundamentally underpins Policy 25 and is a key element of 'Our Approach for Westminster' set out in the City Plan.

4.2.3. The London Plan places specific emphasis on shifting from car use to more space efficient and low-emission transport options (London Plan 10.1.2). This is reflected in many respects by Westminster's draft City Plan. By prioritising alternative kerbside uses such as car club spaces and cycle parking, the council seeks to drive changes in behaviour and a decreased reliance on private car use for getting around the city. Increasing the provision of electric vehicle charging points feeds into this too – Westminster's City Plan standards for 'active provision' go further than those required by the new London Plan in fact. The City Plan as drafted required 50% of parking spaces to have 'active' provision for electric vehicles, while the London Plan requirement is for 20% of residential parking spaces to offer such facilities⁴. Westminster's higher standard is intended to further support modal shift to electric vehicle use. It also aims to improve the appeal of car sharing scheme membership. Meanwhile in its strong support of efforts to consolidate freight facilities in new developments and resisting the net loss of off-street facilities, the City Plan takes an approach to servicing and deliveries. This too directly accords with the emerging London Plan.

4.2.4. However, the council's City Plan does make an evidence based departure from the new London Plan in terms of parking provision. The emerging London Plan specifies a "car free" aspiration, without provision for private car parking for residents as part of new developments (with the exception of disabled bays). This applies in high Public Transport Access Level (PTAL) areas, which much of Westminster is. The draft City Plan, however, stipulates that "*new development should be predominantly car free. Notwithstanding, 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*"⁵.

4.2.5. Any resident of Westminster may apply for a resident's permit for on-street car parking in the parking zone where they live, and they will be issued it by the council. The council's existing policy and procedure around this is not something the City Plan can deal with. Residents' entitlement to apply for a parking permit means that where on-site parking at residential developments is lacking, pressure is created on nearby on street parking. This gives rise to concerns about "*increased congestion, disruption to traffic flow, air and noise pollution, poor parking practices and adverse impact on the amenity of residents*". Referencing its local [Annual Parking Report](#)⁶ and [parking occupancy data](#)⁷, and noting that the London Plan, while seeking to encourage car-free

⁴ London Plan Policy T6.1

⁵ Draft City Plan, Paragraph 28.6

⁶ [Westminster Annual Parking Report \(2017-18\)](#)

⁷ [Westminster Parking Occupancy Survey \(2018\)](#)

residential development, does not impose strictly car-free standards if residents can acquire on-street parking permits, the council has taken the position that *“we will not allow the parking stress level in a local area to exceed the defined threshold of 80% of on-street parking spaces being occupied during the day or night, in compliance with existing parking restrictions”*⁸. This in turn gives rise to our two-strand policy approach, whereby most of the city follows emerging London Plan car free standards, but there is a localised and evidence-based departure from the London Plan resulting in policy 28 setting maximum parking standards specifically covering Parking Zones B and F, where stress on on-street parking is especially intense.

4.2.6. Re-provision of residential parking on Housing Renewal developments is allowed subject to caveats set out in the policy. Schemes will be expected to attain an overall reduction in car parking provision over time, in line with London Plan principles. That said, a tailor-made approach is needed in renewal areas, to ensure the overall objectives of regeneration can be met in line with other aspects of the City Plan and other regional/national policy. In the Church Street renewal area, based on the parking occupancy data mentioned above, the council understands that if we were to replicate existing parking provision in Church Street ward, either the vehicle parking spaces on the renewal sites need to increase or the unit numbers being created within the development would need to decrease. This scenario applies at all three sites making up the project. The level of parking provision will therefore have a major impact on the viability of the scheme and the delivery of affordable accommodation. Achievement of those strategic aims is seen to justify the addition of parking (as a combination of on and off street) within the renewal area.

4.2.7. Bearing in mind that the new London Plan is still under development, the draft City Plan must take account of any issues arising from that ongoing process of examination and adoption. The [London Plan Panel Recommendations report](#) published in October 2019, touches upon issues that connect with Westminster’s sustainable transport policies in a few areas. Key points to note are:

- Air quality: Inspectors acknowledge the Mayor’s aspiration for London to become a (net) zero-carbon city by 2050 and recognise that transport will have a role in this. However, the Inspectors’ recommendations primarily focus on the impact of development in Air Quality Focus Areas and on emissions from buildings; no specific changes to transport policies in respect of air quality are recommended.
- Freight and servicing: Inspectors note the rising trend in road movement for freight in London (40% in the last 25 years or so) and found that the draft London Plan policies were justifiable in supporting consolidation and rationalisation to tackle this. A change to Policy T7 and associated paragraph 10.7.1 is recommended, in order to make it *“clear that the policy seeks to facilitate sustainable freight movement by rail, river and road including through modal shift.”*⁹ This is consistent with Westminster’s thinking – the draft City Plan strongly supports and drives modal shift for all types of transport, freight included.

⁸ Draft City Plan, Paragraph 28.6

⁹ [London Plan Examination in Public Report](#), paragraph 433

- Waterways: The examiners also recommended that Policy T7 of the new London Plan should refer to “waterways”, as opposed to “river” among the potential methods for sustainable freight. This recognises the role of canals, which is relevant to Westminster. The council already uses “waterways” as its chosen terminology for sustainable transport policies in the draft City Plan. This ensures a comprehensive definition.

4.3. Other Local Policy

4.3.1. Westminster’s emerging City Plan directly aligns with existing policy and strategy frameworks at a local (borough) level. The council’s [Greener City Action Plan \(GCAP\) 2015-25](#) outlines the council’s eleven top priorities relating to environmental issues. Among these, priority five (“Supporting a sustainable transport system for Westminster”) is most directly facilitated by Policies 25 to 32 of the draft City Plan, although there are strong relationships also with priority four (“Improving air quality”) and priority eleven (“Communicating and encouraging people into environmental action”).

4.3.2. The draft City Plan also calls upon the council’s Air Quality [Action Plan](#) (2018) and the [Air Quality Manifesto](#) we have published alongside. Air quality is a key issue within this policy topic area, which is discussed in more detail below.

4.3.3. From more of an infrastructure perspective, the Sustainable Transport policies in the draft City Plan align with the council’s [Local Implementation Plan 2019/20 - 2021/22](#), which was approved by the deputy Mayor for London in June 2019. The council has also looked to other local policies and strategies to understand issues like the relationship between sustainable transport and health, protecting biodiversity, and developing practical approaches to freight and servicing in the city. All this learning has directly fed into policy development.

5. Key Issues

5.1. Modal Shift

5.1.1. ‘Modal shift’ – the transfer of people from less sustainable to more sustainable modes of transport over time – is a fundamental concept in this area of policy. The council’s [Greener City Action Plan](#) (GCAP) (2015-25) handled this topic in detail and has been highly informative in the development of Westminster’s planning policy approach to sustainable transport. The GCAP’s own broad and detailed evidence base gives us insight into how different transport modes in Westminster are used. The GCAP notes that *“since 2001 the City Council and Transport for London have recorded a shift in people’s transport patterns, away from private cars and taxis, with an increase in the use of cycling and public transport”*. To demonstrate this trend, the GCAP provides percentage changes by proportion of Westminster residents’ mean of travel to work between 2001 and 2011. A 63.9% increase in cycling a 21.7% increase in walking is noted, while the proportion travelling in a car or van is reported to have decreased by 34.6%. The council is committed to continuing to support this modal shift through the City Plan, which recognises that *“as central London grows the transport network will need to be developed in a manner that meets the demands of the majority in terms of*

encouraging more use of active travel options, like walking and cycling along with the use of bus (including river buses), underground and national rail networks.”¹⁰

5.1.2. These findings align with additional evidence used in development of Policy 25, around changing transport demands. Census data is referenced, showing that Westminster has the fifth lowest car ownership rate in London, at only 37%. Meanwhile Paragraph 25.8 of Policy 25 notes Westminster’s above average rates of walking activity (67% of residents walk for 30 mins at least three times a week, compared to 60% London-wide). Recent [Department for Transport data on road traffic](#)¹¹ shows a significant and continuing decrease in motor vehicle traffic in Westminster since the mid-1990s, with people increasingly choosing to get around the city in other ways. This further demonstrates an existing trend towards more sustainable transport modes and away from private vehicle use – a pattern which the council is keen to consolidate and advance further through the implementation of the City Plan policies.

5.1.3. Westminster’s commitment to reducing the dominance of private vehicles and encouraging a shift to other transport modes is manifested by its policies around car clubs and car sharing. The draft City Plan specifies in paragraph 28.11 that *“a range of vehicle types and sizes”* should be provided through car club schemes, *“including low emission and family sized vehicles”*. The aim here is to broaden the appeal of car clubs and in so doing further reduce demand for car ownership and parking stress.¹² This policy approach aligns with advice from London Councils in their [Car Club Strategy for London](#)¹³. It also picks up on research findings such as the [London Car Club Survey](#) conducted by CoMoUK (Collaborative Mobility UK), a charitable organisation looking at sustainable and active transport. Their latest study of almost 5,400 car club members in London found that while 49% of those who joined their car club in the last 12 months owned a private car at the time of joining, only 34% did afterwards. Once people have been members longer, the effect is even more pronounced – of those that had been a member for more than 12 months, 49% owned a car beforehand, falling to just 27% afterward¹⁴. This suggests that, if car clubs are made to be an attractive option which meets people’s needs, they can have a real impact on rates of private car ownership. This is recognised and borne out by Westminster’s draft City Plan policies.

5.2. Transportation and Health

5.2.1. The Greater London Authority has worked with the Centre for Diet and Activity Research to look at the relationship between transportation and health¹⁵, and their findings form part of the evidence base for Westminster’s City Plan policies. We learn from that work that the three biggest health impacts of travel in London are physical activity from walking and cycling, exposure to poor air quality, and injury in traffic collision. The benefits of walking and cycling, though, were found to clearly outweigh the risks posed by air pollution and accidents, so the health argument in favour of active travel is clear.

¹⁰ Draft City Plan, Paragraph 25.6

¹¹ [Road Traffic Statistics](#), Department for Transport (2018)

¹² Draft City Plan, Paragraph 28.11

¹³ [A Car Club Strategy for London: Growing car clubs to support London’s transport future](#) (London Councils)

¹⁴ [London Car Club Survey](#) (2017-18)

¹⁵ [Transport and Health in London](#) (Greater London Authority with the Centre for Diet and Activity Research, 2014)

5.2.2. The research also demonstrates that the majority of Londoners do not currently meet their minimum physical activity needs (150 minutes per week) in order to be healthy. These London-wide findings are supported by additional local data which indicates that, in Westminster, one in four children entering primary school are overweight or obese and that 44,400 (21.8%) of Westminster residents are considered physically inactive.¹⁶ This is clearly a concern for the council – one which is borne out in our [Joint Health and Wellbeing Strategy](#), developed in partnership with the local NHS Clinical Commissioning Groups. Therein, the council commits to “*work with partners to continue to improve our infrastructure, including transport...to create a supportive environment for good health and wellbeing*”.¹⁷

5.2.3. Westminster’s draft City Plan responds directly to these issues. Dedicated sustainable transport policies that encourage walking and cycling are complemented by policies which tackle air quality concerns and increase road safety. The intended effect, therefore, is to increase the appeal of walking and cycling as ways of getting around the city, at the same time as diminishing or removing some of the major obstacles to people choosing and using those transport modes. All with a view to improving individual and collective health and wellbeing.

Walking

5.2.4. Policy 26 clearly states that development must “*prioritise and improve the pedestrian environment*”, which echoes the ‘pedestrian priority’ stance on street design, outlined in Westminster’s Local Implementation Plan and the Mayor of London’s ‘Healthy Streets’ approach. Additional key evidence is provided by the council’s [Walking Strategy 2017-27](#). The core target of this strategy is to increase the number of walking trips by residents from 84% to 92% of all potentially walkable trips during the life of the strategy. This is very ambitious - it would give Westminster the highest level of resident walking in London. The Walking Strategy outlines the need to provide capacity to support current and future walking demand, and to improve the quality of the walking environment.

5.2.5. Policy 26 of the draft City Plan responds to this evidence, with a focus on enhancement of existing routes which are adequately lit, step free where possible, provide opportunities for rest and are connected in a way which links pedestrian movement corridors and desire lines. Department for Transport minimum standards¹⁸ will be considered with a view to providing high quality footpaths; re-surfacing and de-cluttering are given specific mention as important factors in this. Policy 26 also references the Healthy Streets approach of the Mayor’s Transport Plan, confirming Westminster’s support for providing attractive walking environments as a key priority. Recognising the need for walking to work alongside other activities on street, City Plan paragraph 26.6 sets out how new developments can facilitate change in people’s walking habits. It states that spaces should “*minimise the conflict between pedestrians and competing uses*” – this again draws on evidence and recommendations in the council’s Walking Strategy, which says we should strive to “*encourage walking in balance with all other users of our public space and roads*”.

¹⁶ [ActiveWestminster Strategy 2018-22](#)

¹⁷ [Joint Health and Wellbeing Strategy for Westminster 2017-22](#)

¹⁸ [Manual for Streets](#) (2007) and more recently the [Streetscape Guidance – Fourth Edition](#) (2019)

5.2.6. 'Off street' walking, in Westminster's many green spaces, is also important. In 2018 the council published its [A Partnership Approach to Open Spaces and Biodiversity in Westminster](#), which highlighted that the majority of people who visit Westminster's parks and open spaces get there on foot (63%), and many people use these spaces specifically for walking or as a through route. The strategy recommends continued improvements *"to provide a pleasant walking environment" which offers pedestrians "contact with nature"*. The draft City Plan recognises this, stipulating that development must contribute to (among other walking-related factors) improvements in *"green spaces and canal towpaths"*.¹⁹

Cycling

5.2.7. Cycling is similarly prioritised, with dedicated policies in the draft City Plan to encourage it as a transport choice and support the safety of cyclists on Westminster's roads. Facilities which *"do not conflict with the needs of pedestrians"* are required, with a focus on quality, *"in line with or exceeding London Cycle Design Standards"* (Policy 26).

5.2.8. As in the case of walking, the City Plan's cycling policies have been developed in alignment with existing regional and local policy. The London Transport Strategy tells us that two thirds of current car trips in London could effectively be cycled. This has given rise to plans for a London-wide strategic cycle network, where safe and appealing cycling environments can be offered in a way which reduces the 'severance effect'. The Mayor aims to ensure that, by 2041, 70% of Londoners will live within 400 metres of that network, but *"additional local and neighbourhood improvements"* will also be encouraged. Westminster's draft City Plan aligns with this, committing to the *"delivery of current and planned cycle routes identified in the council's Local Implementation Plan and existing potential Cycle Permeability Schemes"*.²⁰

5.2.9. [Westminster's Cycling Strategy](#) (2014) has provided additional evidence. It focuses on similar themes, in terms of creating safe and legible cycling routes, as well as looking at ways to raise awareness and participation in cycling. It also handles in detail the impact of providing dedicated facilities for cyclists. The strategy suggests working with partners and gauging interest from residents to facilitate accessible and secure cycle parking.

5.2.10. The City Plan responds to this, specifying that *"the needs of cyclists should be given careful consideration during the design of new developments"* (Paragraph 26.10). However, it also recognises pressure from *"competing uses, priority to deliver public realm improvements, high PTAL values across the city and limited space"*. These factors mean that provision of short-stay cycle spaces may not always be appropriate – a position that is supported by Westminster's travel pattern data, which suggests that people don't generally cycle to visit areas like the Central Activities Zone. (Paragraph 26.11).

5.2.11. The council's position is that where there was realistically space to incorporate further short-stay cycle parking on Westminster's streets, it has largely already done so. Also, the council recognises that visits to specific locations by cyclists are frequently part of wider trips. If people leave their cycles parked in one location while they access a number of individual premises on foot, the need for cycle parking at each venue is less. Finally, parking spaces are not the only facilities which can encourage and support

¹⁹ Draft City Plan, Policy 26B, paragraph 2

²⁰ Draft City Plan, Policy 26D, paragraph 2

cycling in the city, of course. Recognising that not having personal ownership of a bike should not be a barrier to cycling in Westminster, Policy 26 supports development which *“contributes towards the introduction and expansion of cycle hire facilities”*. This aligns with evidence which shows steady increases in the use of cycle hire schemes – in 2018 TfL reported a record-breaking year for its Santander sponsored bikes, with more than 10.5 million journeys made.

5.3. Air Quality

5.3.1. Air quality is an issue of particular importance to Westminster City Council and its residents – it is a core priority of the council’s City for All vision. In drafting the City Plan the council has looked to its Greener City Action Plan (GCAP), which indicates that parts of the city are among the worst performers in air quality tests in Europe. NO_x and PM₁₀ emissions from vehicular traffic are a particular concern, highlighted by the council’s [Air Quality Annual Status Report \(2018\)](#). Policy 25 of the City Plan responds directly to these concerns, while the broader topic of transportation’s impact on air quality is a common thread that weaves through a number of the City Plan’s other sustainable transport policies and elsewhere in the plan. From incentivising zero emission options like walking and cycling, to enforcing the ULEZ and encouraging alternatives to fossil fuels for powering travel, there are many ways in which the council’s transport policies will support ongoing improvements in local air quality.

5.3.2. The data has driven a specific ambition at the council to reduce the exposure of children and vulnerable people to transport related air pollution. Our draft City Plan policies reflect this and their implementation will help facilitate the practical proposals of both the Greener City Action Plan and of the city council’s Air Quality Manifesto, which was published in March 2018.

5.4. Freight and Servicing

5.4.1. The council faces particular challenges in respect of freight and servicing in the context of Westminster’s dense, historic, urban fabric, with a high level of demand (including personal deliveries and the growth of ‘click and collect’ services). Policy 29 deals with this issue. The council states its strong support for the provision of consolidated facilities for freight, servicing and deliveries in new development, in accordance with the emerging London Plan. Net loss of facilities will be resisted, recognising that we have evidenced high levels of demand.

5.4.2. In order to meet the particular challenges in the Central Activity Zone (CAZ) the council has developed City Plan policy in line with the West End Partnership’s [Freight and Servicing Strategy](#). That strategy, and the City Plan with it, seeks to go beyond the Mayor’s target of bringing down the number of lorries and vans entering central London in the morning peak by 10% by 2026, by reducing overall numbers of delivery and servicing vehicles in the West End by 10%, rising to 80% at peak visitor times. The draft City Plan also brings into consideration safety for other road users, especially cyclists, in places where servicing takes place. This recognises prevalent public concerns about cycle safety, connecting with the council’s aspirations around increasing cycling as a transport mode of choice in Westminster, and removing obstacles to participation in cycling.

5.5. Public Transport

5.5.1. The Mayor's London Transport Strategy tells us that pressure on public transport is increasing and that, by 2041, the system *"will need to cater for up to 15 million trips every day"*. Through Policy 27 of the draft City Plan, the council seeks *"better connectivity, legibility, quality, usability and capacity in public transport"* to help meet this future need.

5.5.2. Specific key development projects including Elizabeth Line, Crossrail 2 and HS2 are referenced, but the council also wishes to recognise the importance of access to and from public transport hubs/locations. The City Plan reflects the London Transport Plan's assertion that *"a good public transport experience means catering for the whole journey"* because *"all public transport journeys start or finish on foot or by cycle"*. There is therefore strong read-across between City Plan Policy 27 (Public transport and infrastructure) and Policy 26 (Walking and cycling). The council reflects through its policies the importance of safe, legible and attractive walking and cycling routes from which people can transition to and from different forms of public transport. The two are mutually complementary in driving greater use of sustainable transport modes overall. This learning is especially important in supporting City Plan Policies 3 and 4, relating to opportunity areas in Paddington and Victoria. The way that people transition between different modes of transport is a key consideration at transport nodes like these - they have the potential to contribute considerably to our wider aims in terms of modal shift.

5.5.3. Policy 27 gives specific consideration to coach travel, noting that Victoria Coach Station is a Key Development Site (KDS), with a long-term aspiration to close and relocate it. The coach station operations have grown beyond the capacity of the building and its location, which has negative traffic, environmental and amenity impacts. In recognition of this, the site has been designated as a KDS. The council supports the current operation of the coach station in line with TfL needs, but also recognises the need for relocation longer term, and that a suitable alternative site, which supports multi-modal interchange while minimising amenity, traffic and environmental impacts, may be outside Westminster's boundary. This is in line with the emerging London Plan and the Mayor's Transport Strategy. It is also consistent with the Transport for London view that *"coaches play a critical role driving the economy of the capital and beyond, boosting tourism to London and providing affordable travel options with cities across the UK... Without Victoria Coach Station coaches would still travel to the centre of the city but drop off and pick up on-street. This would increase noise, congestion and pollution"*²¹.

5.6. Technology in Transport

5.6.1. One of the key technological innovations relevant to sustainable travel policy is the growth of electric vehicles. The number of 'Ultra Low Emission Vehicles' (ULEVs) is on the rise – 200,000 were registered in Quarter 4 of 2018²². The government is keen to be at the forefront of this change and in 2018 the Prime Minister announced an ambition to *"cement the UK's position as a world leader in the low emission and electric vehicle industry"*²³. This aim is supported by [The Road to Zero](#), in which the

²¹ ['Victoria Coach Station to remain major coach hub'](#) – TfL press release (23 August 2019)

²² [House of Commons Briefing Paper, 'Electric Vehicles and Infrastructure'](#) (Number CBP07480, June 2019).

²³ ['PM announces new measures to tackle effects and causes of climate change'](#) - Prime Minister's Office, 12 December 2017

government outlines its plans for facilitating cleaner transport. This document clearly recognises that “an infrastructure network needs to be in place that is easy for current and prospective drivers to locate and use”, to help drive behaviour change towards greater use of ULEVs. The government therefore commits to “support the development of the infrastructure for electric vehicles”. In line with this national policy position, the council seeks to support the use of electric vehicles locally via City Plan Policy 31. Westminster will “*support the continued roll out of on street charging points*” in line with the emerging Westminster Electric Vehicle Strategy and the policy requires that “*new development must incorporate vehicle charging facilities with a high level of active provision*”. This directly aligns with the emerging London Plan (Policy T6, Section E) with our standards around active provision actually going beyond London Plan requirements. It also works alongside other sections of the City Plan which support electric vehicle use, such as Policy 27 which lists “*sustainable transport initiatives such as electrical vehicle charging infrastructure*” among the things that all major development must support.

5.6.2. Alongside the issue of electric vehicles, the council recognises the role of alternative vehicle fuel sources. In valuing refuelling sites which provide “*the scope to facilitate the more widespread use of innovative energy technologies*”²⁴ Westminster’s draft City Plan reflects the emerging London Plan and also the ‘[Hydrogen London’ report](#)²⁵, which promotes the use and application of hydrogen fuel technologies to provide solutions to London’s energy and environmental challenges. It also picks up on research findings about trends in the types of vehicle on our roads. The latest tranche of Department for Transport data on licensed vehicles in Britain (March to June 2019) showed the number of ‘alternative fuel’ vehicles had “*continued to see increases...a rise of 5% up to 38,000 cars*”²⁶. This was accompanied by an ongoing decrease in registrations of diesel vehicles, indicating a direction of travel towards ‘alternative fuel’ cars. However, the draft City Plan also recognises that “*during the transition from fossil fuels traditional refuelling stations will remain essential*”. The council wants to acknowledge the risk that limiting traditional refuelling options in favour of, for example, hydrogen refuelling before people have adequately transitioned to some of those new technologies, could result in a lack of coverage that causes detour journeys by car in order to refuel negatively impacting congestion and air quality. This would be counter-productive and echoes the Mayor’s Transport Strategy (Policy 23) in that “*new transport services should not encourage more car journeys*”.

5.7. Waterways

5.7.1. Taking a comprehensive definition of sustainable transport, another important factor for Westminster is how we protect and utilise our waterways. The council recognises that Westminster’s waterways have a wide range of uses. As highlighted by Canal and River Trust, “*waterways are multi-functional assets providing multiple economic, social and environmental benefits. In addition to being a form of green and blue infrastructure, important for leisure, recreation and tourism uses, they can provide local and strategic sustainable transport routes*”²⁷. To acknowledge this, the draft City

²⁴ Draft City Plan, paragraph 31.4)

²⁵ [London: a capital for hydrogen and fuel cell technologies](#) (2016)

²⁶ [Vehicle Licensing Statistics: 2019 Quarter 2 \(April – June\)](#), Department for Transport (DfT)

²⁷ [The Values and Benefits of Waterways](#) – Canal & River Trust

Plan takes a circumspect approach, looking at all the implications of using our waterways as part of the transport infrastructure, alongside uses for sport, leisure, recreational and educational purposes. This means supporting decision making with a wide range of evidence, so Policy 32 (Waterways and Waterbodies) ensures that in assessing development proposals affecting Westminster's waterways and waterbodies, the council will have regard to a range of relevant policies, including the [Thames River Basin Management Plan](#), the [Thames Vision](#), the [Marine Policy Statement](#) and the emerging [South East Marine Plan](#).

5.7.2. We need to ensure that developments to enable transport (including by more sustainable modes) do not come at an unacceptably high cost to these important assets. A key City Plan priority in this area is therefore protecting our waterways' *"open character"*, given that they *"offer respite from the built-up nature of the city, supply important habitats for wildlife, and provide the setting for significant heritage assets"*²⁸. This directly reflects the emerging new London Plan, which requires that development *"should support and improve the protection of the distinct open character and heritage of waterways."*²⁹ The council also recognises the value of its waterways as open spaces in their own right. They deliver many of the benefits usually associated with open spaces – as noted by The Inland Waterways Association in their 2017 [Manifesto](#), *"every year across urban and rural Britain millions of us visit inland waterways to fish, walk the towpath, observe wildlife or go boating to enjoy the sheers splendour of our canals and navigable rivers"*.³⁰ This highlights not only the importance of waterways as local assets, but also the direct potential impact they can have on sustainable transport choices by virtue of them providing pleasant environments in which to walk, cycle and be active. Use of evidence like this, along with the council's own [Open Spaces and Biodiversity Strategy](#), helps to ensure that the council's City Plan transport policies concerning waterways are consistent with our wider commitments around protecting heritage, improving health and wellbeing and the supporting the city's wildlife.

5.7.3. Paragraph 32.8 specifically handles the issue of river crossings. The council recognises that developments of this type can come with benefits but also risks – as highlighted by the House of Commons Transport Committee in 2015: *"River crossings can provide financial benefits for businesses but it is less clear that benefits extend to people living nearby who may experience higher traffic flows and poorer air quality."*³¹

5.7.4. The London Mayor has set out proposals for new river crossings in east and southeast London, which aim to *"improve travel across the capital, help deliver new homes and support business."*³² The rationale given for this specific geographic focus is that *"London is expanding to the east and southeast. Yet there are currently few ways to cross the river in those areas. We urgently need new crossings to support housing and business opportunities there."*³³ The proposed new crossings therefore form part of the Mayor's transport strategy, responding to an identified need where provision is currently lacking, and feeding into particular development and regenerations objectives in the immediate area.

²⁸ Draft City Plan, paragraph 32.2

²⁹ New London Plan Policy S17B

³⁰ [Inland Waterways Association Manifesto](#) (2017)

³¹ [House of Commons Transport Committee – Strategic River Crossings report](#) (March 2015)

³² [Transport for London announcement: New River Crossings for London](#)

³³ [Mayor of London announcement: More river crossings for all Londoners and improving river transport](#)

5.7.5. The council recognises these local factors in eastern/south eastern boroughs. With a very different set of circumstances in Westminster, though, the City Plan states that as a matter of principle proposals for new crossings will not be favoured in the city. However, scope for flexibility is retained – exceptions will be made where proposals can “*demonstrate that they meet a robustly evidenced strategic transport need*” and that this need would have to be “*on a scale sufficient to outweigh the importance of protecting our waterways’ open character*”³⁴, as indicated above. The transport benefits of any proposed crossing must also must drive forward our wider sustainable transport objectives. Any new crossing “*should be designed for pedestrians and cyclists only, and link to the public transport network to incentivise sustainable travel*”. In this way it directly echoes policies earlier in the City Plan relating to modal shift, and thereby flows logically from national, regional and local evidence base which support those policies.

6. Conclusion

- 6.1. Westminster City Council has developed a robust and far-reaching set of policies dedicated to the topic of Sustainable Transport. We have worked to ensure soundness of these policies, working directly from a substantial (and growing) evidence base. The council addresses, through its draft policies, the central concept of driving modal shift, in terms of encouraging, supporting and motivating people to choose more sustainable methods of travel. Several of our policies are directly targeted at reducing the reliance on, and dominance of the street by, private vehicles. Where there is divergence from the principles set out in the emerging new London Plan (e.g. the council’s proposed approach to parking) there are clear and evidenced local reasons for this. Those reasons are grounded in our aim of managing existing on-street parking stress, to alleviate anticipated problems including poor parking behaviours and problems with traffic flow.
- 6.2. Other key issues in this topic area, including air quality and health impacts, are handled through dedicated policies which relate strongly and explicitly back to evidence from key sources. Those sources include the London Transport Strategy, the council’s own Local Implementation Plan, and research findings from health partners, government agencies and the world of academia.
- 6.3. The evidence base relating to sustainable transport is growing all the time and Westminster is determined to stay at the forefront, continuing to use new findings and innovations to identify ways to facilitate more sustainable travel into and around the city. Ongoing developments in the evidence base – and any changes in the emerging new London Plan and wider national policy framework – will therefore be reflected in any future revisions to the City Plan and all associated policy making.

³⁴ Draft City Plan paragraph 32.8

CITY PLAN

2019 – 2040



City of Westminster