

Statement of Common Ground
Westminster City Council and the Mayor of London
and Transport for London
October 2019
V2.1

1. Introduction

This Statement of Common Ground (SCG) has been prepared jointly between Westminster City Council (the council), the Mayor of London (the Mayor) and Transport for London (TfL) to set out areas of agreement between both parties specifically in relation to Westminster's draft City Plan 2019-2040 Policy 28 Parking. It focusses on issues which were raised by the Mayor and TfL as a result of the Regulation 19 consultation and explains our positions at time of submission of Westminster's City Plan to the Secretary of State.

The SCG is entirely separate to another SCG shared with the Mayor and neighbouring local planning authorities covering a range of other City Plan matters.

2. Background

The Mayor and TfL's representation on the Regulation 19 draft City Plan (dated June 2019) stated that they broadly support the draft City Plan policies where they align with TfL's current priorities and relevant draft London Plan policies. The draft London Plan was first consulted on in December 2017, and has since been through its Examination in Public (EiP). In response to representations made at the EiP, a revised draft was released with consolidated suggested changes, including to the transport policies. The parking standards remain substantively unchanged at this advanced stage of the adoption process.

The Mayor and TfL acknowledge the shift in the City Plan's policies since the publication of the informal draft (November 2018) to more closely align with the Mayor's Healthy Streets Approach. Following the close of consultation, officers representing the Mayor and TfL have also acknowledged, through engagement meetings that the council's overall position on parking provision has moved significantly in a short space of time.

The City Plan parking policy follows the (new) London Plan parking standards for the whole borough except for parking zones B and F. The council has primarily justified these on the grounds of very high existing parking stress on-street in these zones and the high levels of growth expected to take place over the City Plan period which could lead to increased stress. In parking zones B and F a maximum of 0.4 parking spaces per unit may be permitted (not required) as part of residential development.

3. The Mayor & TfL's position

The Mayor and TfL support the alignment of the City Plan policy with the draft London Plan parking standards¹ for the majority of the borough. However, they object in principle to the exemptions for parking zones B and F. The level of provision is considered to be unacceptable given public transport access levels and its location within the Central Activities Zone. Both the Mayor and TfL consider that enabling car parking to be provided in these two areas (particularly given this is where much of Westminster's growth is planned) will lead to increased road danger, poor air quality and congestion, severance, noise and greenhouse gas emissions and adverse impacts on public health and public transport reliability.

The Mayor and TfL acknowledge that some of these problems can be partially addressed through a switch to electric vehicles and car club membership from petrol/diesel vehicles and private car use respectively. However, they also state that the level of parking provided affects the amount of housing that can be delivered and if costly, can impact on affordable housing levels. Both the Mayor

¹ See appendix

and TfL argue car-free development can be successfully implemented without exacerbating parking stress through management of on-street parking or the restriction of permits as carried out in surrounding authorities.

In addition to this, TfL have specifically objected to Clause F of the parking policy which allows for the full re-provision of car parking where existing housing estates are redeveloped.

4. The Council's position

The Council welcome the Mayor and TfL's support and acknowledgement of how far the City Plan has evolved since the informal consultation draft in 2018.

While the Council acknowledges the argument underpinning the position of the Mayor and TfL on nil car parking in central London and other areas that are well connected by public transport, it maintains that there is sound justification for departing from the draft and as yet unadopted London Plan (it is noted Table 6.2 of the adopted London Plan² theoretically allows for up to one space per unit in high PTAL areas but advocates significantly less than this and for car-free development to be promoted in such areas) for the reasons set out in the supporting text to the policy. Namely that these zones already experience high levels of parking stress and, with a high level of residential development expected in these areas over the plan period, this will result in a significant number of extra cars.

Without on-site parking provided the council considers this will mean more cars searching for parking spaces on street exacerbating parking stress and contributing to congestion and poor air quality. The Council understands why the Mayor and TfL recommend the restriction of parking permits as a solution to existing high parking stress, however consider it unreasonable for this objection to be linked to a general conformity objection as the control of parking permits sits outside of the local plan.

The Council considers that provision of electric vehicle parking provision and car club membership are a reasonable tool to use to go some way to mitigate the issues raised by the Mayor and TfL on congestion and pollution.

5. Areas of agreement

Following a meeting with TfL on 25th September 2019 and the Greater London Authority officers on 2nd October 2019, the Mayor and TfL agree the following with the Council:

- the City Plan parking policy has positively moved significantly forward from the informal consultation version of the Plan in November 2018 *towards* alignment with the draft London Plan and related transport strategies.
- comment or objections relating to how the council decides to issue parking permits do not form part of the general conformity objection put forward by the Mayor and TfL as the City Plan cannot control the issuing of parking permits and the Mayor and TfL have no direct influence over this local government process.

² See Appendix

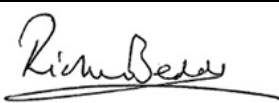
- to compromise on the re-provision of parking on existing housing estates – the Mayor and TfL accept that there is justification for allowing some re-provision through the policy provided parking is limited to existing residents who will continue to live at the estate post redevelopment and not new residents.
- a switch from petrol/diesel vehicles to electric vehicles can help mitigate the impact of the policy on air quality and noise, though not road danger, severance or congestion. The use of car clubs can potentially help mitigate some of these challenges if they can be used to reduce overall car use.
- supporting text to policy 28 relating to the costs and convenience of owning a car compared to the practicalities and costs of using public transport for young families does not provide a compelling justification for provision of on-site car parking provision when balanced against other plan objectives and bullet point 4 of supporting text paragraph 28.8 will be removed.
- changes to the wording of policy 28 to remove the exception to the draft London Plan's parking standards for parking zones B and F would in the Mayor and TfL's opinion resolve their general conformity objection (on this policy and in relation to the new draft London Plan) and expedite the City Plan through examination.
- Policy 28 is in general conformity with the adopted London Plan.


6. Outstanding matters

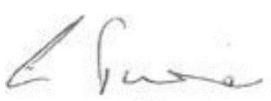
- While the council accepts that there is a conflict between the current wording of policy 28 and the draft London Plan on this issue and understands the Mayor's position, it maintains that local circumstances justify the approach taken in the City Plan.
- The Mayor and TfL disagree with the council's justification for the reasons set out in their representation to the City Plan's Regulation 19 consultation and as summarised in section 3 of this Statement.
- This SCG is an iterative document and the council, Mayor and TfL agree to continue the dialogue to reach agreement. Upon publication of the Inspector's report on the draft London Plan and as the City Plan moves through the examination process, this statement will be revisited and updated accordingly.

7. Signed confirmation

The Council, Mayor of London and TfL agree that this SCG represents an accurate record of their respective positions in relation to draft City Plan policy 28 Parking.

Signed on behalf of Westminster City Council		
Name and Position	Signature	Date
Councillor Richard Beddoe Cabinet Member for Place Shaping and Planning		28/10/2019

Signed on behalf of Mayor of London		
Name and Position	Signature	Date
Juliemma McLoughlin Chief Planner		22/10/2019

Signed on behalf of Transport for London		
Name and Position	Signature	Date
Lucinda Turner, Director of Spatial Planning		18/10/2019

Appendix: Draft and adopted London Plan Policy

Draft London Plan (July 2019)

Policy T6.1 Residential parking

- A New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.
- B Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.
- C All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.
- D Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. Any car club spaces should have active charging facilities.
- E Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.
- F The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.
- G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
 - 1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset
 - 2) demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.
- H All disabled persons parking bays associated with residential development must:
 - 1) be for residents' use only (whether M4(2) or M4(3) dwellings)
 - 2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling
 - 3) be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)

- 4) count towards the maximum parking provision for the development
- 5) be designed in accordance with the design guidance in BS8300vol.1
- 6) be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.

Table 10.3 - Maximum residential parking standards

Location	Maximum parking provision*
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	Car free~
Inner London PTAL 3	Up to 0.25 spaces per dwelling
Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas	Up to 0.5 spaces per dwelling
Inner London PTAL 0 – 1 Outer London PTAL 3	Up to 0.75 spaces per dwelling
Outer London PTAL 2	Up to 1 space per dwelling
Outer London PTAL 0 – 1	Up to 1.5 spaces per dwelling ^
* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed	

~ With the exception of disabled persons parking, see Policy T6.1 G

^ Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit

Adopted London Plan (March 2016)

POLICY 6.13 PARKING

Strategic

- A The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- B The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

- C The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be the basis for considering planning applications (also see Policy 2.8), informed by policy and guidance below on their application for housing in parts of Outer London with low public transport accessibility (generally PTALs 0-1).
- D In addition, developments in all parts of London must:
 - a ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
 - b provide parking for disabled people in line with Table 6.2
 - c meet the minimum cycle parking standards set out in Table 6.3
 - d provide for the needs of businesses for delivery and servicing.

LDF preparation

- E
 - a the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs.
 - b in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)
- c in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole
- d outer London boroughs wishing to promote a more generous standard for office developments would need to take into account in a DPD
 - a regeneration need
 - no significant adverse impact on congestion or air quality
 - a lack (now and in future) of public transport
 - a lack of existing on or off street parking
- e Outer London boroughs should demonstrate that they have actively considered more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0-1) and take into account current and projected pressures for on-street parking and their bearing on all road users, as well as the criteria set out in NPPF (Para 39).
 - a commitment to provide space for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds
 - a requirement, via Travel Plans, to reduce provision over time.

Parking for residential development

Table 6.2 Car parking standards

PTAL 0 to 1			PTAL 2 to 4		PTAL 5 to 6	
Suburban	150–200 hr/ha	Parking provision	150–250 hr/ha	Parking provision	200–350 hr/ha	Parking provision
3.8–4.6 hr/unit	35–55 u/ha	Up to 2 spaces per unit	35–65 u/ha	Up to 1.5 spaces per unit	45–90 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–65 u/ha		40–90 u/ha		55–115 u/ha	
2.7–3.0 hr/unit	50–75 u/ha		50–95 u/ha		70–130 u/ha	
Urban	150–250 hr/ha		200–450 hr/ha		200–700 hr/ha	
3.8–4.6 hr/unit	35–65 u/ha	Up to 1.5 spaces per unit	45–120 u/ha	Up to 1.5 spaces per unit	45–185 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–80 u/ha		55–145 u/ha		55–225 u/ha	
2.7–3.0 hr/unit	50–95 u/ha		70–170 u/ha		70–260 u/ha	
Central	150–300 hr/ha		300–650 hr/ha		650–1100 hr/ha	
3.8–4.6 hr/unit	35–80 u/ha	Up to 1.5 spaces per unit	65–170 u/ha	Up to one space per unit	140–290 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–100 u/ha		80–210 u/ha		175–355 u/ha	
2.7–3.0 hr/unit	50–110 u/ha		100–240 u/ha		215–405 u/ha	

Maximum residential parking standards			
number of beds	4 or more	3	1-2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

Notes:

All developments in areas of good public transport accessibility in all parts of London should aim for significantly less than 1 space per unit

Adequate parking spaces for disabled people must be provided preferably on-site²⁰⁶

20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.