

STATEMENT OF COMMON GROUND

Westminster City Council – Greater London Authority (Mayor of London) – Transport for London

1. Introduction

- 1.1. Through the development, consultation and examination process to date of Westminster's draft City Plan, there has been significant discussion about Policy 28, which outlines the council's proposed approach to parking in the city. Following Regulation 19 consultation in June 2019, the Mayor of London (the Mayor) and Transport for London (TfL) co-signed a [Statement of Common Ground](#) (SCG) with the council, which outlined each party's position on the council's proposed policy approach at that time. Officers representing the Mayor and TfL acknowledged that the council's overall position on parking provision has moved significantly in a short space of time to reach that point.
- 1.2. There are further developments occurring all the time which amend the context within which the council's City Plan will operate. These include the publication of the Inspector Panel's report on the London Plan, publication of the Mayor's response to that report indicating no further change to the parking policy in the new London Plan, and a letter from our Inspector indicating the weight that will be applied to the new London Plan during the examination of the City Plan. It is therefore considered timely, at this point in the examination process, to revisit the issues surrounding Westminster's proposed parking policy by way of a refreshed Statement of Common Ground.

2. Background

- 2.1. The City Plan parking policy is in conformity with the requirements of the existing London Plan. However, the emerging new London Plan set ambitious new targets around sustainable transport, driving strongly towards modal shift from private vehicle use to more sustainable and space efficient methods of travel, in line with the Mayor's Healthy Streets vision set out in the Mayor's Transport Strategy. As part of this, the emerging London Plan specifies a "car free" aspiration, without provision for car parking for residents as part of new developments (with the exception of disabled persons' bays). This applies both in central London and in high Public Transport Access Level (PTAL) areas, which much of Westminster is.
- 2.2. The City Plan as currently drafted aligns with this standard for the most part but makes an exception for two specific areas of the city. The new London Plan parking standards would therefore apply for the whole borough except for parking zones B and F. This is explained in Policy T6 which 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"*.
- 2.3. Westminster City Council is committed to promoting more sustainable modes of travel over private car ownership and already has comparatively low rates which give a good foundation of behaviour on which to build. Census data shows that Westminster has the fifth lowest car ownership rate in London, at only 37%. Recent [Department for Transport](#)

[data on road traffic](#)¹ demonstrates the direction of travel, with a significant and continuing decrease in motor vehicle traffic in Westminster since the mid-1990s. We also strongly promote car clubs and car sharing. Zipcar membership stands at 16,500 city-wide and is increasing all the time, with an average of 275 new members signing up each month. So, Westminster's car club schemes are, and will continue to be, an important tool in helping people transition away from private vehicle ownership.

3. Westminster City Council's Position in the previous SCG

- 3.1. The council has primarily justified this proposed policy position on the grounds of very high existing parking stress on-street in these zones (evidenced by Westminster's [Annual Parking Report](#)⁶ and [parking occupancy data](#)), and the high levels of growth expected to take place over the City Plan period which could lead to increased stress. This is connected with the council's current practice of not limiting the issue of residential parking permits, which can create pressure on on-street provision. The council has therefore retained scope for limited on-site parking provision at residential developments in parking zones B and F, stipulating a maximum of 0.4 parking spaces per unit may be permitted (but not required).
- 3.2. The issue of pressure on on-street parking and the link to residential permits is explored in detail in the council's [Topic Paper on Sustainable Transport](#) published in November 2019.

4. The Mayor and TfL's Position in the previous SCG

- 4.1. The Mayor and TfL support the alignment of the City Plan policy with the draft London Plan parking standards for the majority of the borough but 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. Concerns are raised in respect of increased road danger, poor air quality, congestion, severance, noise, greenhouse gas emissions and adverse impacts on public health and public transport reliability.
- 4.2. Additionally, the Mayor and TfL recognise that that the level of parking provided both affects the amount of housing that can be delivered, and if costly, can impact on affordable housing levels. Both parties argue that 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.
- 4.3. In the earlier SCG the Mayor and TfL agreed that Policy 28 of the draft City Plan is in general conformity with the adopted London Plan. The final position reached at that time was that 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.

¹ [Road Traffic Statistics](#), Department for Transport (2018)

5. New Position as of January 2020

- 5.1. The council remains persuaded of the soundness of its proposed policy, in view of local factors and the available evidence. However, the council also finds the position of the Mayor and TfL compelling, particularly in light of the developments referred to above (Panel Report publication, the Mayor's response to the City Plan, etc). The council recognises the validity and importance of the sustainable transport approaches put forward by the new London Plan. The City Plan is directly supportive of those aims. Objective 5 of the plan commits to: *"enhance connections by improving options for cycling and walking, prioritising pedestrians, improve interchange between transport modes and incorporate innovative solutions to manage the highway network."* With dedicated policies such as those to encourage modal shift to walking and cycling (Policy 26), support public transport (Policy 27) and use technological innovation in transport (Policy 31), the council seeks to continue the current trend of decreasing reliance on private vehicles to get around the city. The council acknowledges the role that parking provision has to play in achieving these broader aims.
- 5.2. With all this in mind, at this stage of developing its City Plan the council will accept a modification to its proposed parking policy, following confirmation from the Planning Inspectors that this is necessary in order to make the plan sound.
- 5.3. The Mayor and TfL note that the Panel Report on the new London Plan found that the standards are justified, that there is a need for a consistent, strategic-level approach across London and that on-street parking controls can be successful in tackling problems at a local level. The Mayor and TfL remain of the view that modifications are necessary to ensure consistency and general conformity with the new London Plan and it would remain an issue of Local Plan soundness without them. Should the modifications proposed below be accepted, the Mayor and TfL would withdraw their objection.

6. Resolving the Issue - Potential Policy Amendment

- 6.1. If the Planning Inspector determines that, in order to secure the soundness of Westminster's City Plan the parking policy must be altered to bring it into general conformity with the new London Plan, the council propose the following wording amendments to Policy 28. If the modifications are undertaken, all supporting text (though not detailed here) will be amended to be consistent with changes to the Policy itself.

Policy 28: Parking

The parking standards in Appendix 2 will apply to all developments ~~except in parking zones B and F where the following maximum residential standards will apply:~~

~~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.~~

50% of ~~all new parking these~~ spaces should provide active provision for electric charging vehicles while the remaining spaces should incorporate ~~a~~ passive provision.

~~BC. In zones B & F W~~ where on-site parking is delivered applicants will:

- provide car club membership for all residents and provision of car club spaces;
- 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;

- prioritise the issue of parking spaces within development to families with young children; and let, rather than sell, parking spaces to ~~new~~ residents of new developments on a short-term basis, with spaces allocated to individual addresses or property numbers.

Appendix 2: Parking Standards

~~In parking zones B & F, new residential development should not exceed the maximum residential parking standard of up to 0.4 spaces per unit and those standards under clauses B and D-H of the Draft London Plan Residential Parking policy.~~

~~Outside of these zones, clause A of Policy T6.1 of the Draft London Plan will also apply.~~

~~Where parking spaces are provided, 50% of these spaces will provide active provision for electric charging vehicles while the remaining spaces will incorporate passive provision.~~

~~Where on-site parking is provided, spaces may be reserved for the sole and short-term let use for residents of the new development, with spaces allocated to individual addresses or property numbers.~~

Location	Maximum parking provision
CAZ 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 unit
Inner London PTAL 2	Up to 0.5 spaces per unit
Inner London PTAL 0-1	Up to 0.75 spaces per unit
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.	

~~Relevant m~~**Maximum residential parking standards from the Draft London¹ Plan**

¹~~Refer to draft London Plan for full policy wording~~

7. Signatures

The Mayor (Greater London Authority) agrees these revisions to Policy 28 would remove the general conformity objection relating to the parking policy.



Signed: Debbie Jackson
Position: Director – Built Environment
Date: 12th February 2020

Transport for London agrees these revisions to Policy 28 would remove the general conformity objection relating to the parking policy.



Signed: Josephine Vos
Position: London Plan and Planning Obligations Manager
Date: 17 Feb 2020

Westminster agrees to accept these revisions if the inspectors consider them necessary to make the City Plan sound.



Signed:
Position: Cabinet Member for Business and Planning
Date:

03/02/2020