

By email only

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18/1/2021

Dear Sir/Madam,

Westminster City Plan proposed modifications – November 2020

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (Property) to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the proposed modifications to Westminster City Plan.

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Publication London Plan and its evidence base are now material considerations and have significant weight. Publication of the final version of the new London Plan is anticipated before the end of the financial year, at which point it will form part of Westminster's Development Plan and contain the most up-to-date policies.

Local Plan policies should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

Our comments on specific modifications and suggestions for amendments or wording improvements are detailed below.

MM27 – We are concerned that the modification may unnecessarily make it harder to secure necessary transport mitigation. While public realm improvements are identified in the borough's CIL schedule, this should not preclude site-specific public realm mitigation through S106 contributions (for instance, if a development will increase footfall on a narrow pavement, it is not unreasonable to require the development to widen the pavement to mitigate this impact). Equally, 'public realm improvements' should not be seen as a single 'piece' of infrastructure, but rather a series of separate improvements, some of which can be funded by CIL (in any case, changes to the CIL regulations in 2019 allowed for S106 and CIL to pay for the same piece of infrastructure).

Furthermore, the wording suggests that improvements to sustainable modes occur through public realm improvements, rather than directly. We are highly concerned that this would hamper our ability to secure, for example, an increase in bus service frequency for the first few years of a development to support the additional travel demand. This is common practice elsewhere in London and considered fundamental to mitigating impacts at some sites. We consider that other sustainable modes are sufficiently covered elsewhere in the Plan, and that this section should draw due attention towards buses.

We therefore suggest the following changes to the proposed modification

*Major development must... **facilitate and** make a financial contribution towards **any necessary** improvements to the public realm ~~which facilitates improvements to and/or the operation~~ the **local** bus network and associated infrastructure;*

MM28 – We welcome changes to policy 28 which provides confirmation that London Plan parking standards will apply to all developments (residential, non-residential and redeveloped sites), in line with the proposed changes that were submitted to the Examination and the Statement of Common Ground agreed with TfL.

We also support the changes to paragraph 28.5 which provides further confirmation and justification.

Although we are pleased to note that the proposed changes to paragraph 28.6 have removed an explicit reference to provision of off street parking in the vicinity of the site, it is essential that the 'other measures agreed by the Council' do not include the provision of, or residents' access to, additional parking. TfL suggests that the final sentence is amended to read 'As a minimum, mitigation may include lifetime car club membership for all future residential occupiers, increased cycle parking quantum and quality within the development and other measures **that provide alternatives to or reduce car ownership, as** agreed with the council.'

The proposed new paragraph 'Cycle and motorcycle parking' requires modification to ensure consistency with the London Plan. Cycle parking should be provided in accordance with the London Plan. If, due to space constraints, off-site provision has to be considered, it should be designed to ensure that it is integrated into the public realm. We consider that the reference to conflict with public realm enhancements could act as a discouragement to provision of cycle parking and should be deleted.

The amended wording for the first sentence of the paragraph titled 'Cycle and motorcycle parking' should therefore be as follows:

Cycle parking should be provided in accordance with the London Plan. ~~where they do not conflict with public realm enhancements.~~

We welcome the addition of the paragraph titled 'Cycle facilities'

We welcome the reference in paragraph 28.14 to the eligibility criteria for on-street residents' parking permits being kept under review. We strongly encourage WCC to actively review this policy as soon as possible, as issues of parking stress are much simpler to prevent than they are to correct after the fact. While nearly all inner London boroughs restrict the eligibility of residents of new developments to apply for parking permits, and this option does lie within the authority's planning powers and the scope of the City Plan, we do appreciate that the borough may wish to explore other options. Such options could include the practice of capping the overall number of permits in areas of high parking stress, and operating a waiting list for those who move into the area (with some exceptions, such as disabled drivers having priority). For example, this is practised by Brighton and Hove Council. It would have the same effect of managing parking stress, but it would apply equally to residents whether they are moving into existing or new development. We would be happy to support and participate in any such review into different options.

MM29 – We welcome the proposed addition to this policy and the accompanying paragraphs in the justification that clarifies the resistance to the loss of highway land would apply to footways and cycling space as well as the road itself.

We hope that these comments will be taken into account when finalising the Westminster City Plan and we look forward to working with you as it moves towards adoption.

Yours faithfully,

Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

[Redacted Signature]