

Transport for London – Written Statement on Matter 6 / Question on Policy 28

Westminster City Plan 2019 – 40 Examination

Are the parking standards set out in Policy 28 and Appendix 2 of the City Plan in general conformity with the London Plan? Are they appropriate and justified? Are the proposed modifications necessary for soundness?

No, the parking standards in Appendix 2 are not in conformity with the London Plan and would not be appropriate or justified.

We strongly welcome the inclusion of modification [PS/C/03](#) and those that complement it in the revised schedule of modifications, which reverts Westminster's parking standards to be in line with the draft London Plan, replacing the previous maximum of 0.4 spaces in zones B & F. We note this change is classified as a 'main' modification and that is explained in terms of the NPPF soundness tests. We agree that these modifications are necessary to achieve soundness and to make the policy effective, consistent with national policy and in conformity with the London Plan. In particular, it will contribute to Government's aim to decarbonise transport and make best use of land in city centres and at transport hubs. We have set out supplementary evidence on this point in the appendix below, should it prove to be useful.

However, we do have remaining concerns regarding some modifications that have been attributed to our statement of common ground with Westminster (SCG_003_V2) despite not appearing in that statement:

- In particular, **we consider that modification PS/C/08 undermines the delivery of car-free housing and should be removed.** We have concerns with the idea of requiring the provision of off-street parking to be made in the vicinity of the site, effectively breaching the maximum of car-free as per the new London Plan. Not only could this facilitate an increase in car ownership, it could potentially prevent parking spaces from being repurposed to other uses such as public realm, walking and cycling infrastructure and in the case of off-street parking, housing (for example by 'locking in' the parking use at multi-storey car parks which could otherwise be redeveloped).
- More generally, the modification refers to mitigating the 'impact of increased car ownership' on Westminster's streets as a result of new development. The notes column refers to this being necessary to bring the policy in line with the London Plan approach. For the sake of clarity, this is not in line with the London Plan approach which seeks car-free development in well connected areas such as Westminster. This is instead a result of WCC's preferred approach to kerbside management, as the council acknowledged in our SCG: "[the potential for growth to lead to parking stress] 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."

- We also have concerns with PS/C/18. This caveats the car-free requirement by saying that residents *will* still be able to apply for parking permits (despite then going on to say this will be kept under review). It then goes onto add new text that states the issue of permits will have adverse impacts on highways, but it is not clear how this is a helpful contribution for planners or developers and certainly not an addition that is necessary to bring the paragraph in line with new London Plan.

We have a minor comment on modification PS/C/07 – the language of ‘balance new development with the prevention of excessive parking’ is from the 2016 London Plan, rather than the draft London Plan as it now implies. Our preference would be for this language to be updated, such as to ‘the draft London Plan principle of reducing car dependency and creating Healthy Streets’.

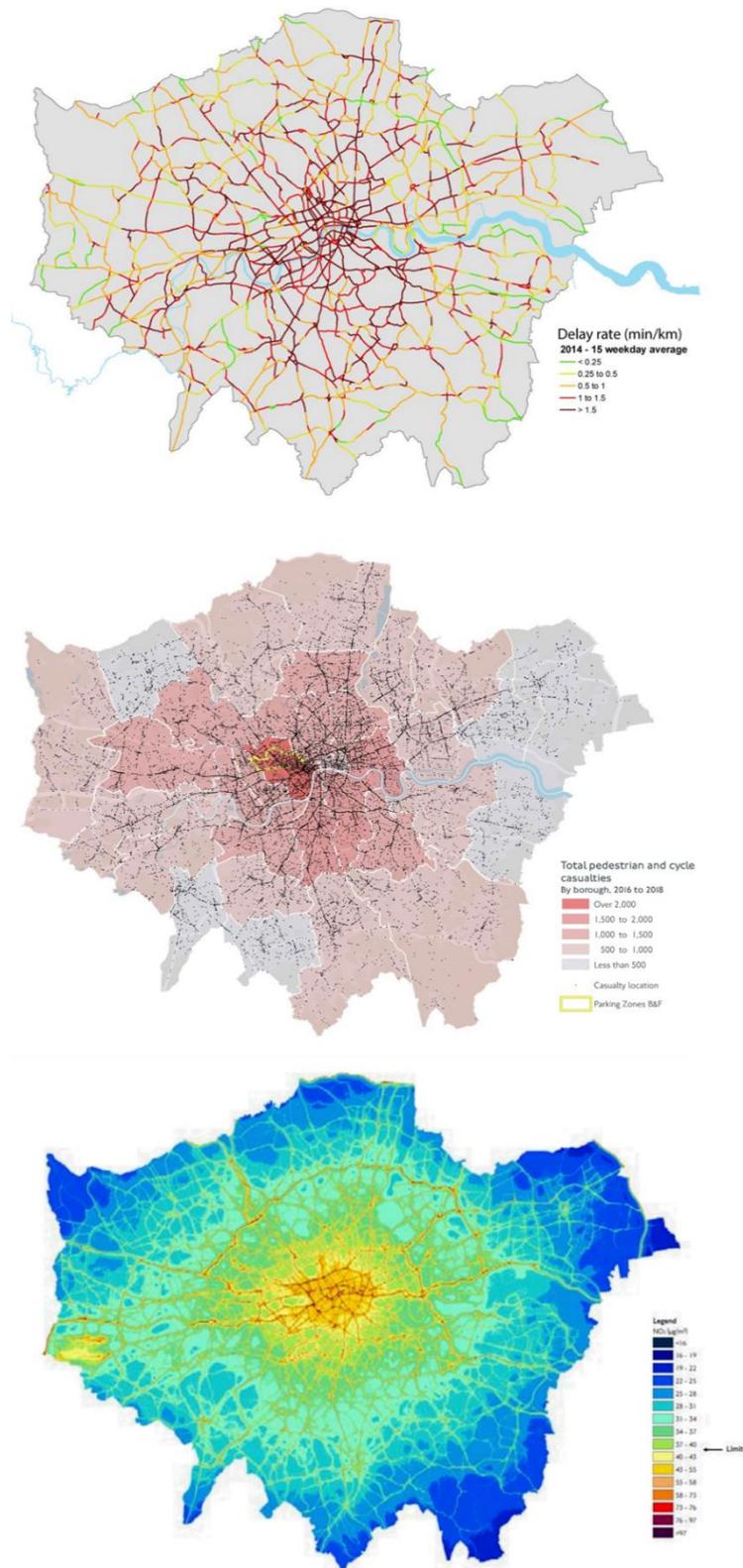
Appendix – additional evidence

The Mayor has set out his aim for 80 per cent of all trips in London to be made by walking, cycling or public transport by 2041. To achieve this target, we will need to meet mode shares of at least 95 per cent in central London and 90 per cent in inner London (NB this includes all car-based travel including taxis which play a more significant role in central)

There is a demonstrable relationship between parking provision at a new development and residents' levels of car ownership and use. While cars can bring benefits to their individual users, their use generates a host of cumulative and wider negative impacts on others around them which need to be managed. These include climate change, noise and severance, as well as the challenges that are particularly critical in Westminster: congestion, road danger and emissions (see right¹). Generating additional car journeys though higher parking standards risks exacerbating these acute challenges where they are most pressing.

Restrictions to residential car parking are not only necessary to address the significant challenges that London faces today, but also as the city grows. London's population is expected to grow to 10.8m by 2041, meaning a growing number of people will be using the city's constrained road network. Reducing parking provision in new homes is a key element of ensuring sustainable development in London and enables greater housing delivery, both by ensuring the best use of land and preventing unacceptable impacts that could inhibit future development. Furthermore, congestion generated by new residential parking will delay buses and freight at a time

Figure 1 – Congestion (delay per km, 2014/15, recorded walking and cycling casualties (2016-18) and emissions (NO2 2013)



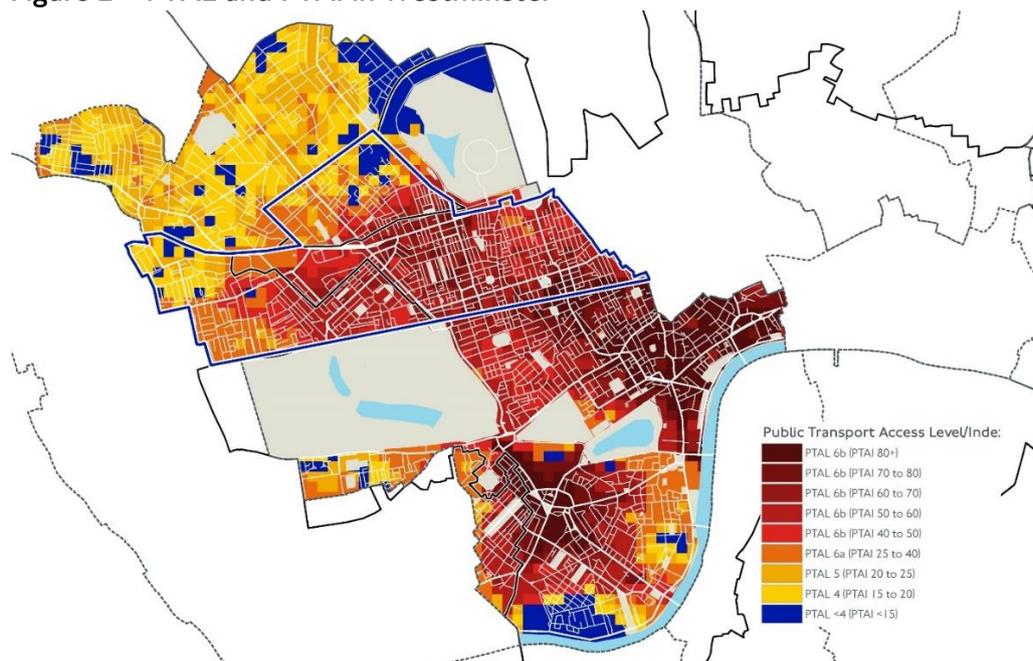
¹ Sources: Top/bottom: MTS Evidence Base Challenges and Opportunity Report. Middle: TfL analysis of road collisions data

when the transport network is under more pressure than ever before.

As well as having transport implications, parking provision in areas such as Westminster where constrained sites are common typically involves the construction of a basement, sometimes with a car lift to enable access. This has considerable build-cost implications, which are either absorbed by those using the spaces (in which case the price restricts access to those who are more affluent), spread across the development as a whole (in which case non-car owners are forced to subsidise car owners) or through reducing other costs, such as affordable housing contributions.

Westminster's connectivity and access to local jobs and services are among the highest of any part of London, and indeed any city in the world. Figure 2 shows the Public Transport Access Level (PTAL) and Index (PTAI) that underpins it. A PTAI score of 40 is enough to be classified as a PTAL 6B, the highest available. However, parts of zones B score over twice this (dark red) yet would be allowed car-parking while less well-connected areas to the north of the zone would car-free under the London Plan standard (yellow). This world-leading connectivity makes living car-free particularly feasible, but for those that do wish to make the occasional trip by car, the borough has both a dense network of car clubs and considerable coverage from taxi and private hire services.

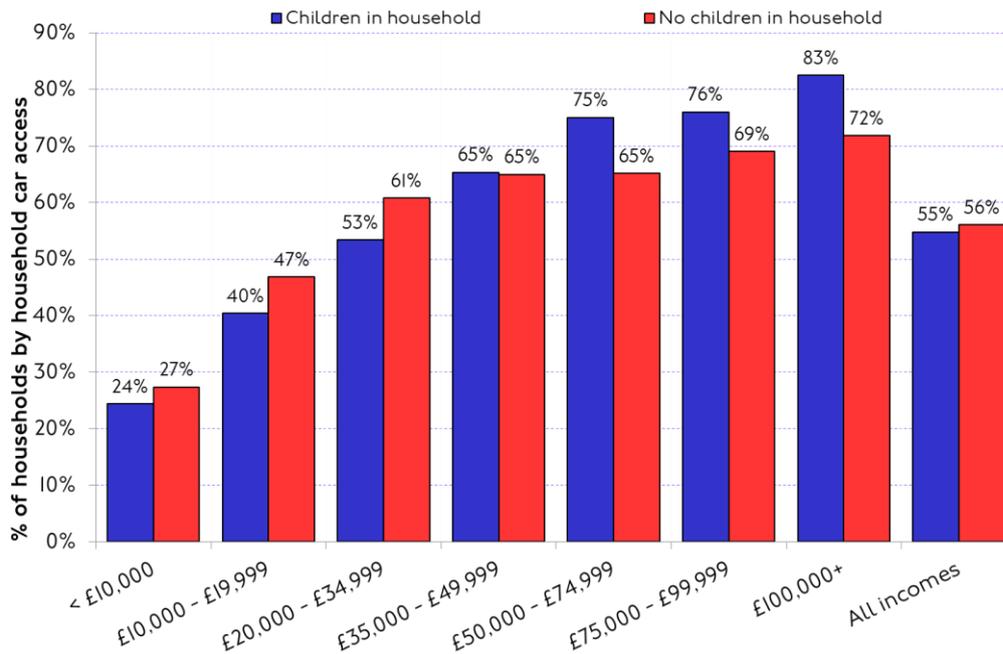
Figure 2 – PTAL and PTAI in Westminster



While some suggest cars are necessary for families, our evidence suggests that the presence of children in the household is not a good predictor of car ownership across London, only doing so above a certain income threshold. In fact, the presence of children in a lower income household suggests *lower* car ownership, possibly due to the costs of both raising children and owning a car. Justifying parking provision on the basis of providing for families could therefore raise questions about which families are benefiting. As explained above, any families who choose not to own a car may end up bearing some of the cost of providing

parking if it is subsidised. If users are to pay the true cost of the parking provision, it is unlikely to be affordable to many families at all.

Figure 3 – Car ownership by household income and presence of children in the household



Source: London Travel Demand Survey / Travel in London report 12

Given this evidence, it is both necessary and feasible to implement car-free development in Westminster in line with the new London Plan. This can be delivered without higher parking stress through the use of suitable kerbside management policies, rather than accepting additional road network impacts through higher parking provision.

Options for managing parking stress can include the restriction of permit eligibility for residents of new developments (as is the practice in all planning authorities that neighbour Westminster) or capping the total number of permits issued and operating a waiting list, as practiced by local authorities such as Brighton & Hove City Council. These practices are a necessary reflection of the reality of finite kerbside space in a growing, densely populated city. We would be happy to support the WCC to explore these options and identify best practice to help support their ambitions both for accommodating growth and delivering a better public realm for residents and visitors.