





Southwark Disabled
Parking Usage Review

London Borough of Southwark

Report
January 2018

Our ref: 23252801
Client ref: SH

Prepared by:

Steer Davies Gleave
67 Albion Street
Leeds LS1 5AA

+44 113 389 6400
www.steerdaviesgleave.com

Prepared for:

London Borough of Southwark
160 Tooley Street
London
SE1 2QH

Steer Davies Gleave has prepared this material for London Borough of Southwark. This material may only be used within the context and scope for which Steer Davies Gleave has prepared it and may not be relied upon in part or whole by any third party or be used for any other purpose. Any person choosing to use any part of this material without the express and written permission of Steer Davies Gleave shall be deemed to confirm their agreement to indemnify Steer Davies Gleave for all loss or damage resulting therefrom. Steer Davies Gleave has prepared this material using professional practices and procedures using information available to it at the time and as such any new information could alter the validity of the results and conclusions made.

Contents

| | |
|---|-----------|
| Executive Summary | i |
| Overview..... | i |
| 1 Introduction | 1 |
| Background..... | 1 |
| Structure of this report..... | 1 |
| 2 Context | 2 |
| Overview..... | 10 |
| 3 Policy Context | 11 |
| Current London Borough of Southwark policy | 12 |
| Existing London Plan (2016) | 12 |
| Draft future London Plan (2017)..... | 12 |
| Accessible London Supplementary Planning Guidance (SPG) (2014)..... | 14 |
| Review of policy approaches in other inner London boroughs..... | 15 |
| Accessible homes..... | 16 |
| Case studies | 17 |
| 4 Stakeholder feedback | 20 |
| 5 Conclusions | 26 |
| Recommendations..... | 27 |

Figures

| | |
|--|----|
| Figure 2.1: PTAL levels in Southwark..... | 3 |
| Figure 2.2: Distribution of population by PTAL zone, 2006 to 2015..... | 4 |
| Figure 2.3: Change in population and vehicles in Southwark 2008-2015 | 7 |
| Figure 2.4: Blue Badges issued and held in Southwark | 9 |
| Figure 4.1: Disabled parking bays at site D..... | 24 |
| Figure 4.2: Disabled parking bays at site B | 25 |

Tables

| | |
|---|----|
| Table 2.1: Modal PTAL scores throughout Southwark | 4 |
| Table 2.2: Step-free access to rail stations | 5 |
| Table 2.3: Population with reduced mobility in Southwark | 6 |
| Table 2.4: Number of cars registered in Southwark by year | 7 |
| Table 2.5: Change in car ownership 2010-2015 | 8 |
| Table 2.6: Modes used to travel to work in Southwark (LTDS 2007/2008 compared with 2015/16) | 8 |
| Table 3.1: Residential Disabled Parking Standards per London borough/London Plan | 16 |
| Table 3.2: Case Study Sites for Disabled Parking Assessment..... | 18 |
| Table 3.3: Disabled Parking Requirements per London borough/London Plan (Case Study Sites) | 19 |
| Table 4.1: Summary of feedback from stakeholders..... | 22 |

Appendices

- A** Summaries of standards for residential disabled parking in inner London boroughs
- B** Stakeholder topic guide

Executive Summary

Overview

The London borough of Southwark is preparing the New Southwark Plan, a set of borough-wide planning policy documents which includes specification of the requirements for disabled parking provision at new residential developments.

Under existing planning policy, residential disabled parking bays are allocated up to a maximum of one space per wheelchair accessible unit. This report assessed the appropriateness of this level of parking within policy taking into account changes to personal travel habits, improved accessibility of the public transport network and guidance from the draft London Plan.

Since the original planning guidance was developed, the following key trends have occurred:

- **Southwark residents are less car dependent:** Car ownership by households remains static but the overall number of cars registered in the borough has declined. The use of cars for travel to work has decreased from 13% of trips to 8% of trips.
- **The proportion of the population with reduced mobility has remained relatively static** and is expected to stay at around one in ten of the population. Not all people with reduced mobility qualify for a Blue Badge that would allow them to use disabled parking bays – only 2% of the population hold a Blue Badge. According to Department for Transport statistics, there are 7,000 Blue Badge holders and the number of Blue Badges issued each year in Southwark remains relatively stable at around 2,500 to 2,700 per year.
- **The physical accessibility of the public transport network has increased** with all buses now fully accessible including wheelchair ramps and audio/visual information provision. Nearly all bus stops offer level boarding. All Hackney Carriages in Southwark are wheelchair accessible. While there have been improvements to the accessibility of the Underground network, only half of Underground stations are fully accessible and, within Southwark, most rail stations do not provide step-free access.

Generally, it is more viable in 2018 for some disabled people to live in Southwark without requiring ownership of a car when compared to the period when planning guidance was drafted, though there remain barriers to Underground and rail use by disabled people due to a lack of stations with step-free access.

The guidance contained with the Draft London Plan suggests lower levels of disabled parking provision, with one designated disabled persons parking bay per dwelling for 3% of dwellings. This ratio was applied to a sample of completed residential developments in Southwark to illustrate the potential change resulting from applying the new London Plan standards. Across eight sites at which a total of 201 disabled parking bays are provided, applying the standard from the London Plan would result in 69 spaces, around one third of existing provision.

While there are existing planning requirements for a proportion of new housing to be accessible units, there is no requirement that these units are inhabited by disabled people. Feedback from representatives interviewed at those residential sites and site visits found that, where disabled parking is allocated to individual accessible units, this may result in use by non-disabled people. Where disabled bays are allocated to individual properties that are then inhabited by non-disabled people, this can have the effect of increasing the attractiveness of accessible properties to non-disabled people – the provision of a parking may act as an incentive for non-disabled people to buy/rent those properties and to own a car. This has the

result of facilitating car ownership by non-disabled people in areas where planning policy is to restrict car ownership and encourage car-free living.

The following recommendations are made:

- De-couple accessible housing provision from disabled bay provision, so that disabled bays are not used by non-disabled people. As per the recommendations of the draft London Plan, The New Southwark Plan should make clear that disabled bays should not be allocated to individual accessible residences, rather that a pool of disabled parking bays is available at each site for use by any Blue Badge-holding residents (including residents of non-accessible units).
- Disabled parking in the north of Southwark, where public transport accessibility is high, could be provided at a lower level in accordance with the draft London Plan. In areas to the south of the borough, disabled bay provision could be higher to reflect the lower Public Accessibility Level (PTAL) ratings.

1 Introduction

- 1.1 Steer Davies Gleave was commissioned by London borough of Southwark to undertake a review of disabled parking usage at residential sites in the borough. The council has been preparing “The New Southwark Plan” which states that a development must ‘Provide accessible car parking spaces up to a maximum of one car parking space per wheelchair accessible unit.’ With changes to personal travel habits, improved accessibility of the public transport network, Southwark wishes to assess the appropriateness of this level of parking within policy.

Background

- 1.2 The New Southwark Plan, being prepared by LBS, includes a requirement for one accessible car parking space up to a maximum of one car parking space per wheelchair accessible unit. This requirement is similar to the existing requirement within the Sustainable Transport Supplementary Planning Document (SPD) which notes *“For housing we require at least one disabled car parking space per development and we expect one space for each disabled flat or house”*.
- 1.3 Most larger residential schemes (of over 100 units) implemented during the last ten years are in the north of the borough where public transport accessibility is high, which may reduce the need for disabled people living in this area to own a car. It is therefore possible that the disabled parking requirements therefore result in an over-provision of disabled parking. There is a need to consider to what extent the one space per unit policy is relevant to schemes in highly accessible areas and options for more flexible planning requirements which guarantee disabled parking bays for residents who require them, but do not result in a large number of unused bays.
- 1.4 The borough includes areas of high public transport accessibility in the north and lower accessibility to the south – as such, the parking needs of disabled residents are likely to differ across the borough. The physical accessibility of the transport system is also a consideration – the bus fleet across the borough is accessible but most Underground stations are not accessible, limiting the journey options for disabled people.
- 1.5 Where disabled parking bays are provided but not used by the resident of the accessible unit, there is a need to understand more about what currently happens to those spaces (such as conversion to standard bays, or other non-parking uses). There is also a need to understand more about how disabled bays are allocated, managed and enforced.

Structure of this report

- 1.6 Following this introduction, section 2 provides the Southwark context including analysis to understand the extent to which disabled people in Southwark might be able to live without owning a car. Section three outlines the policy context including the draft London Plan and section four outlines feedback obtained from stakeholders at residential developments to date.

2 Context

- 2.1 Exploration of a range of data sources sought to establish the background trends in vehicle ownership, population change, use of Blue Badges and changes in the physical accessibility of the public transport network. Analysis sought to understand the extent to which disabled people in Southwark might be able to live without owning a car and whether this had changed since the existing planning guidance was issued over ten years ago.

Population changes

- 2.2 The population of Southwark grew from 270,091 in 2006 to 311,049 in 2015 (the most recent figures available),¹ a growth of 15%.

Public transport accessibility

- 2.3 This population increase appears to have been distributed evenly across different areas of public transport accessibility. Transport for London's Public Transport Accessibility Level tool classifies each area of Southwark according to the availability and frequency of public transport services. In Southwark, areas to the north have high PTAL levels, with lower levels to the south as shown in Figure 2.1.
- 2.4 The distribution of population across the different PTAL zones in Southwark in each year since 2006 found that, the distribution of the population within each of the PTAL categories has remained fairly stable, as illustrated in Figure 2.2. In 2006, 38% of the population lived in areas of the borough with a high PTAL rating (5, 6, or 6A), the same proportion as in 2015. However, the overall number of residents in high PTAL areas increased from 102,635 to 118,119.
- 2.5 In 2015, 26% of residents lived in an area rated 6a or 6b, the most accessible categories. In contrast, only 4% lived in an area rated 1a or 1b. Southwark is one of the most accessible London boroughs with a variety of bus, Underground and National Rail connections and residents are likely to live within a short distance of these links, enhancing PTAL ratings within the borough. PTAL varies throughout the borough and the modal PTAL score for each ward is given in Table 2.1.

¹ Experian

Figure 2.1: Public Transport Accessibility levels in Southwark.

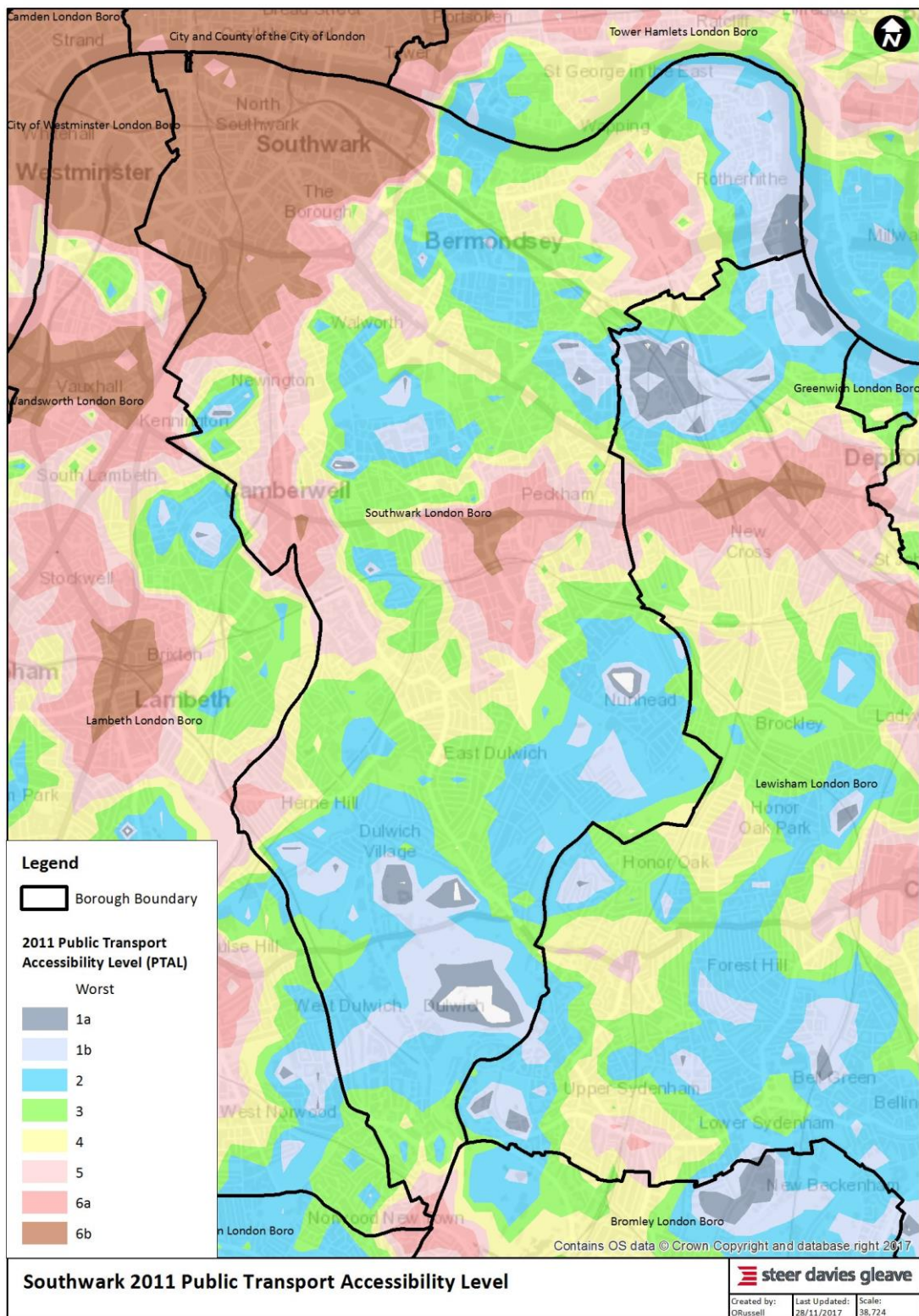


Figure 2.2: Distribution of population by PTAL zone, 2006 to 2015

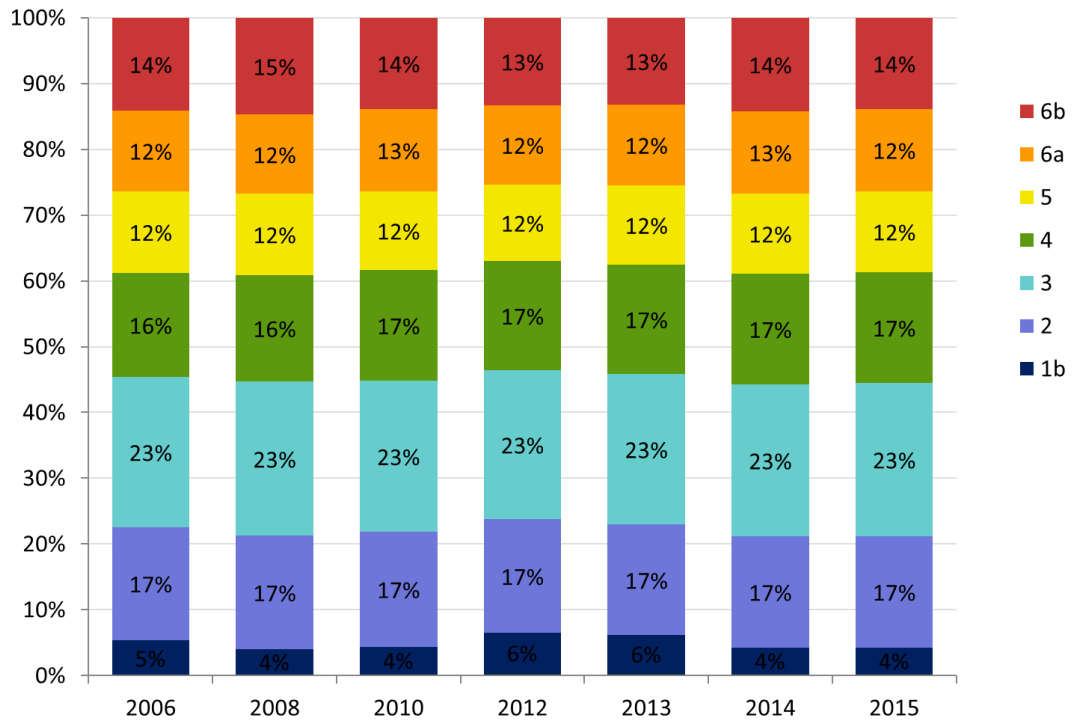


Table 2.1: Modal PTAL scores throughout Southwark

| Ward | Modal PTAL score |
|-----------------------|------------------|
| The Lane Ward | 5 |
| Camberwell Green Ward | 5 |
| Faraday Ward | 4 |
| East Walworth Ward | 4 |
| Chaucer Ward | 4 |
| East Dulwich Ward | 3 |
| South Camberwell Ward | 3 |
| Livesey Ward | 3 |
| South Bermondsey Ward | 3 |
| Rotherhithe Ward | 3 |
| Cathedrals Ward | 3 |
| Riverside Ward | 3 |
| College Ward | 2 |
| Peckham Rye Ward | 2 |
| Nunhead Ward | 2 |
| Brunswick Park Ward | 2 |
| Peckham Ward | 2 |
| Newington Ward | 2 |
| Grange Ward | 2 |
| Surrey Docks Ward | 2 |

Accessibility of the public transport network

Buses

- 2.6 Since 2007, the proportion of buses which are fully accessible for disabled users has risen from 80% to 100% in 2015. Every bus now has a designated wheelchair space, automatic wheelchair ramps as well as an iBus audio-visual system to help those with impaired vision or hearing. Wheelchair and mobility scooter users are able to travel for free on buses.
- 2.7 As of September 2017, 95% of the bus stops in London are accessible for disabled users. This means that the buses have a kerb high enough for the wheelchair ramp to be used and that the step onto the bus is at a reasonable height for those with reduced mobility to board.

Underground

- 2.8 A programme to introduce step-free access at more stations is underway and by 2018, over half of all Underground stations will have step-free access, rising from 30% in 2008. Currently in Southwark there is step-free access at Elephant & Castle, Borough, London Bridge, Bermondsey, Canada Water, Southwark, Waterloo and Kennington.

National Rail and London Overground

- 2.9 Southeastern and Southern operate the majority of the National Rail services which serve the stations in LBS. Both operators offer accessibility assistance to ensure that disabled passengers are able to travel although not all stations provide step-free access. London Overground also operates within the borough and provide step-free access at some stations. The stations that have step-free access to platforms are shown in Table 2.2, which shows that nine of the fourteen stations in the borough lack step-free access, limiting the potential for travel by rail by disabled people.

Table 2.2: Step-free access to rail stations

| Station | Step free access? |
|---------------------|-------------------|
| Elephant & Castle | No |
| North Dulwich | No |
| Nunhead | No |
| Peckham Rye | No |
| Rotherhithe | No |
| South Bermondsey | No |
| Surrey Quays | No |
| Sydenham Hill | No |
| West Dulwich | No |
| Canada Water | Yes |
| Denmark Hill | Yes |
| East Dulwich | Yes |
| London Bridge | Yes |
| Queens Road Peckham | Yes |

Other Services

- 2.10 All of the 22,000 black cabs in London are wheelchair accessible with a ramp which can be lowered to allow wheelchairs to board. Many vehicles also have swivel seats, high visibility

seat panels, large coloured grab handles and hearing aid induction loops to aid those with disabilities.

- 2.11 Assisted transport services operate within the borough; Dial-a-Ride is a door-to-door service for those that cannot use public transport and trips can be booked in advance. Disabled residents can also join the Taxicard scheme which gives subsidised fares for pre-booked journeys in London taxis.

People with reduced mobility in Southwark

- 2.12 A study by Transport for London looked at the number of Londoners with reduced mobility in order to inform the London Assembly's Transport Committee report 'Accessibility of the Transport Network' (November 2010). The study estimated the number of residents in each borough with reduced mobility affecting ability to travel and estimated for 2018 and 2031. In this context, reduced mobility refers to wheelchair users, people with other disabilities and those with walking difficulties. The figures can be seen in Table 2.3 which shows that around one in ten of the population has reduced mobility and, while this proportion is only expected to increase by one percentage point by 2031, due to population growth, it is anticipated that the overall number of people with reduced mobility will increase by just under 6,000.

Table 2.3: Population with reduced mobility in Southwark

| Year | Total Population | Reduced mobility population | % |
|------|----------------------|-----------------------------|-----|
| 2010 | 281,493 | 29,830 | 11% |
| 2018 | 310,457 ² | 32,503 | 10% |
| 2031 | 353,584 | 38,415 | 11% |

Car ownership

- 2.14 The number of cars registered in Southwark rose slightly from 2013 to 2015 after falling in the previous years. In 2016, there were just under 60,000 registered private cars and light goods vehicles in the Borough compared to over 63,000 in 2008, as shown in Table 2.4. The table also shows the number of registered disabled vehicles exempt from tax providing they are used by disabled people claiming the higher rate of the mobility component of Disability Living Allowance (DLA), War Pensioners Mobility Supplement (WPMS) or have an invalid carriage. This is not the same as Blue Badges which may be obtained by those who do not claim DLA, WPMS or have an invalid carriage.

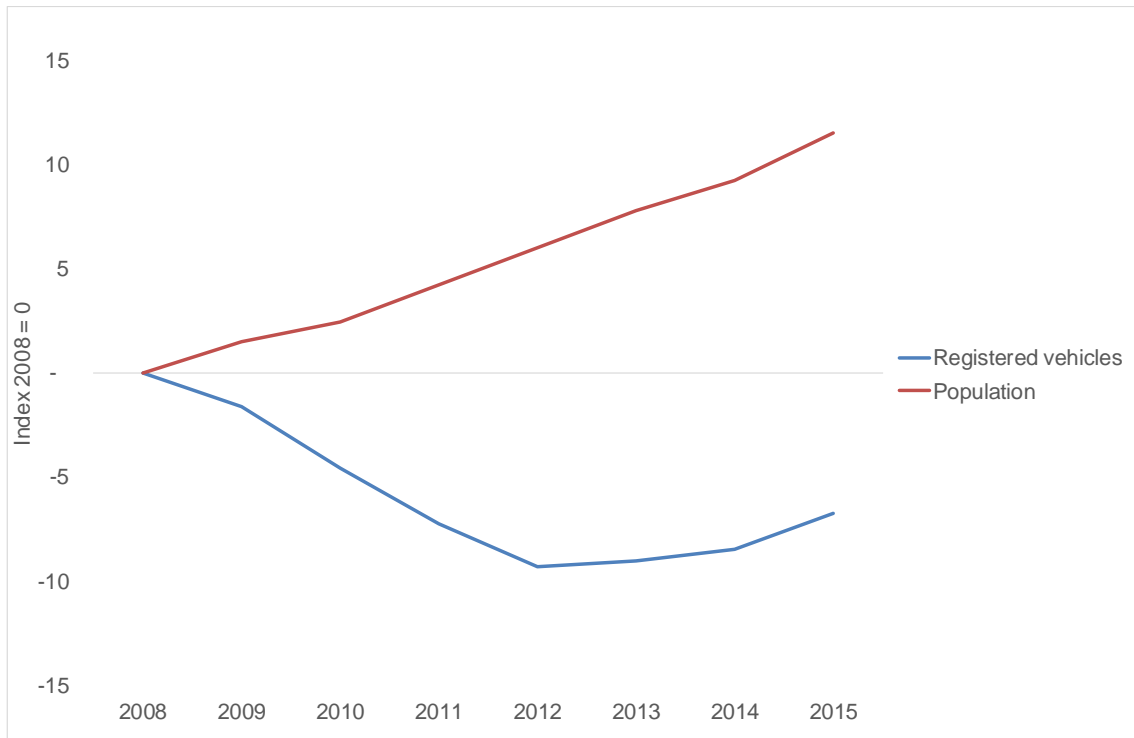
² Note, this figure was a projection from a report produced in 2010 and is therefore slightly lower than the population figure provided earlier in this report.

Table 2.4: Number of cars registered in Southwark by year³

| Year | Private cars and light goods vehicles | Disabled vehicles |
|------|---------------------------------------|-------------------|
| 2008 | 63,546 | 3,319 |
| 2009 | 62,511 | 4,041 |
| 2010 | 60,626 | 4,303 |
| 2011 | 58,940 | 4,117 |
| 2012 | 57,629 | 4,339 |
| 2013 | 57,790 | 3,937 |
| 2014 | 58,160 | 3,988 |
| 2015 | 59,240 | 3,193 |
| 2016 | 59,824 | 2,860 |

2.15 As shown in Figure 2.3, since 2008, the number of vehicles registered in Southwark has declined while the population has grown, albeit vehicle registrations have started to increase again from 2013 to 2015.

Figure 2.3: Change in population and vehicles in Southwark 2008-2015



2.16 Table 2.5 shows the change in car ownership in households in Southwark between 2010 and 2015. The data from the London Travel Demand Survey shows that there has been little change in the proportion of households owning vehicles over this period and the proportion of households owning vehicles remains fairly low at 40% owning at least one vehicle.

³ *Delivering Southwark’s Transport Plan, Annual Monitoring Report 2015/16, London Borough of Southwark*

Table 2.5: Change in car ownership 2010-2015

| Number of vehicles | 2010 | 2015 |
|--------------------|------|------|
| 0 | 59% | 60% |
| 1 | 33% | 34% |
| 2+ | 8% | 6% |

Travel to work by car

- 2.17 In the most recent London Travel Demand Survey (LTDS), only 8% of residents reported travelling to work by car as driver and 2% by car as passenger. Most commuters in the London Borough of Southwark travel to work by public transport or active modes. Data shows that 54% travel by public transport (Bus, National Rail, Underground or Overground) while a third travel by either bicycle or foot.
- 2.18 The breakdown of change in use of different modes since 2007 is shown in Table 2.6. The data shows that the proportion of people travelling to work by car has dropped from 14% to 10%.

Table 2.6: Modes used to travel to work in Southwark (LTDS 2007/2008 compared with 2015/16)

| Mode | 2007 | 2015 | % point change |
|---------------------------|------|------|----------------|
| Car driver | 13% | 8% | -5 |
| Car passenger | 1% | 2% | +1 |
| Bus | 33% | 25% | -8 |
| Walk | 18% | 23% | +5 |
| National Rail/ Overground | 12% | 20% | +8 |
| Cycle | 7% | 11% | +4 |
| Underground | 14% | 10% | -4 |
| Taxi | 0% | 1% | +1 |

Costs of car ownership

- 2.19 Owning and running a car in London is becoming steadily more expensive which may reduce the number of residents keeping their own vehicles. Studies have shown that car insurance prices rose 14% from 2016 to 2017⁴ and charges such as the Congestion Charge and the new Emissions Surcharge are adding additional costs with both applying to journeys in the north of the borough. Petrol prices have risen 4.4% from December 2016 to December 2017.⁵ In comparison, average salaries across the UK grew by 2.5% in the third quarter of 2017 (ONS)⁶ meaning that the cost of owning a car has increased considerably in real terms.
- 2.20 The introduction of the £10 daily “T-charge”, where older vehicles driving in central London now need to meet minimum Euro emission standards or pay an extra daily charge, and the £11.50 daily congestion charge make driving more expensive for those entering the Congestion Charging Zone, although Blue Badge holders are exempt from both.

⁴ <https://www.confused.com/car-insurance/price-index>

⁵ <http://www.theaa.com/driving-advice/driving-costs/fuel-prices>

⁶

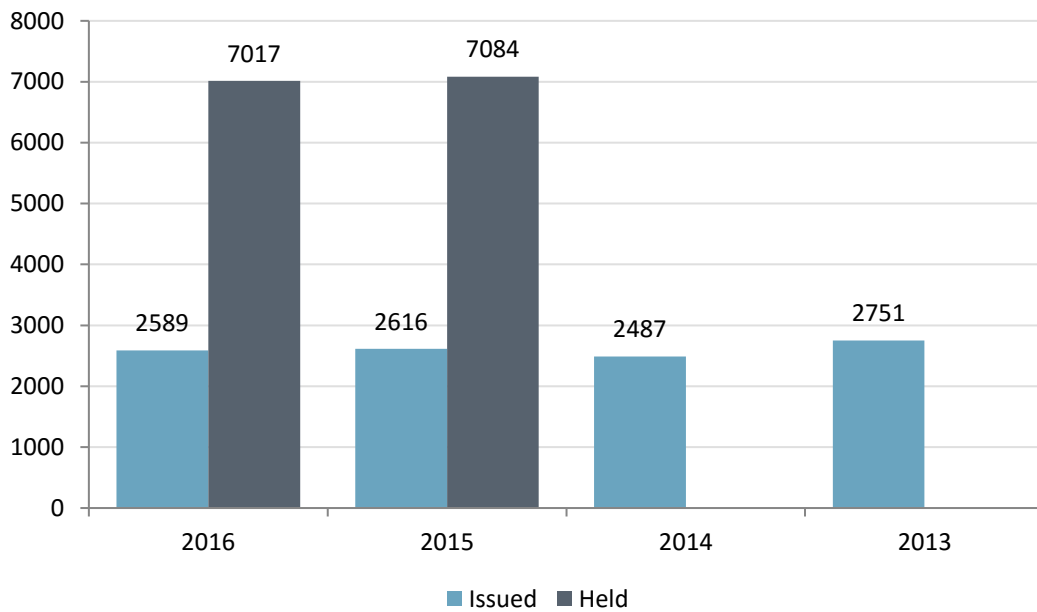
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/december2017#summary-of-latest-labour-market-statistics>

2.21 Zipcar Car Club operates within the borough a car club in the borough with 78 vehicles available throughout Southwark. 83% of residents now live less than a ten minute walk from the nearest bay⁷ meaning that joining a car club is now a viable alternative for some disabled people who do not require adapted vehicles.

Blue badge holders

2.22 In 2016, there were 7,051 Blue Badges held by residents in Southwark⁸. This represents 2.2% of the overall population of Southwark which is similar to the average for Inner London boroughs of 2.1%. The overall number of badges issued in the borough decreased by 6% from 2013 to 2016.

Figure 2.4: Blue Badges issued and held in Southwark



⁷ Delivering Southwark’s Transport Plan, Annual Monitoring Report 2015/16, London Borough of Southwark

⁸ Department for Transport, Table DIS0108ii

Overview

2.23 Since the existing planning guidance was drafted:

- Southwark's population has increased by 15%.
- Percentage of households with access to a car remains static but the overall number of cars registered in the borough has declined.
- The use of cars for travel to work has decreased from 14% of trips to 10% of trips.
- The proportion of the population with reduced mobility has remained relatively static and is expected to stay at around one in ten of the population. Not all people with reduced mobility qualify for a Blue Badge that would allow them to use disabled parking bays – only 2% of the population hold a Blue Badge. The number of Blue Badges issued each year in Southwark remains relatively stable at around 2,500 to 2,700 per year.
- The physical accessibility of the public transport network has increased significantly with all buses now fully accessible including wheelchair ramps and audio/visual information provision. Nearly all bus stops offer level boarding.
- All Hackney Carriages (i.e. Black Cabs) in Southwark are % wheelchair accessible.
- While there have been improvements to the accessibility of the tube network, only half of Tube stations are fully accessible and, within Southwark, most rail stations do not provide step-free access.

3 Policy Context

3.1 This section sets out existing policy standards for disabled parking in Southwark, the existing and proposed London Plan and summarises approach to residential disabled parking requirements in other boroughs. This provides context and local precedent for informing future disabled parking standards and planning requirements for the New Southwark Plan.

3.2 The following documents were consulted as part of the policy review:

London-wide Policy Documents

- London Plan (2016);
- Draft London Plan (2017); and
- Accessible London Supplementary Planning Guidance (SPG) (2014).

Local Policy Documents of a selection of other London Boroughs

- New Southwark Plan
- Lambeth Local Plan (2015);
- Camden Development Policies (2010)
- Camden Local Plan (2017)
- Camden Planning Guidance (2017);
- Islington Core Strategy (2011);
- Islington Development Management Document (2013);
- Islington Planning Obligations (Section 106) (2016);
- Tower Hamlets Managing Development Document (2013);
- Tower Hamlets Review of Car and Cycle Parking Standards (2011);
- Tower Hamlets Draft Local Plan 2031 (2016);
- Wandsworth Core Strategy (2016); and
- Wandsworth Development Management Policies (2016).

3.3 Summaries of the approach to disabled parking provision in each borough are provided in Appendix A.

Current London Borough of Southwark policy

- 3.4 The following requirements for residential, accessible car parking, are specified in the New Southwark Local Plan (2017):
- Provide accessible car parking spaces (maximum of one car parking space per wheelchair accessible unit). The number of spaces is determined by:
 - anticipated demand and tenure of the development; and
 - quality and accessibility of public transport links and local amenities.
 - Ensure that car parking spaces that are provided:
 - within the development and close to the nearest entrance or lift core;
 - with sufficient space to access the rear and each side of the vehicle;
 - with entrance ramps of the correct gradient to accommodate higher vehicles when parking is underground;
 - where easy manoeuvrability into and out of the space is provided; and
 - remain designated as accessible parking in perpetuity.
- 3.5 This policy intends to ensure that the mobility needs of disabled people are provided to a consistently high standard. Requirements for additional parking spaces are expected to correspond with development location, demand, public transport accessibility and use of the development.

Existing London Plan (2016)

- 3.6 The London Plan provides the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20 to 25 years.
- 3.7 Policy 6.13 'Car Parking Standards' states that "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. In locations with high public transport accessibility, car-free developments should be promoted, while still providing for disabled people."
- 3.8 All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than one space per unit, and adequate parking spaces for disabled people must be provided preferably on-site.

Draft future London Plan (2017)

- 3.9 The Draft London Plan was released for public consultation in December 2017, setting out initiatives to support the delivery of the Mayor's strategic target to achieve 80% of all trips in London undertaken by foot, cycle or public transport by 2041.
- 3.10 To achieve this, the draft London Plan suggests lower standards for residential parking compared to the existing plan.

- 3.11 Policy T6 relates directly to parking, where the following aims relate to disabled parking at residential developments:
- Car-free development should be promoted for all development proposals in places that are/will be well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').
 - A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to forthcoming TfL guidance.
 - Appropriate disabled parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled parking. Disabled parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
 - ensure that at least one designated disabled persons parking bay per dwelling for 3% of dwellings is available from the outset. If 3% of a scheme is less than one space, this should be rounded up to one.
 - demonstrate how the remaining bays to a total of one per dwelling for 10% of dwellings can be requested and provided when required for future disabled parking. If disabled parking provision is not sufficient, spaces should be provided when needed either upon first occupation or in the future.
 - All disabled parking bays associated with residential development must:
 - be for residents' use only;
 - not be allocated to specific dwellings, unless provided within the curtilage of the dwelling;
 - be funded by the payment of a sum by the applicant, if provided on-street;
 - count towards the maximum parking provision for the development;
 - be designed in accordance with the design guidance in BS8300 vol. 1; and
 - be located to minimise the distance between disabled parking bays and the dwelling. The route should be level or where this is not possible, gently sloping (1:60-1:20) on a suitable firm ground surface.
- 3.12 A key priority of the London Plan is for London to be an accessible city, where it is easy for disabled people to live and travel. The plan notes that disabled people should have an increased choice of housing that they can afford within a local environment that meets their needs. It is recognised that some will be dependent on car travel, therefore disabled parking should be provided for new residential developments. All parking should be marked and restricted to users only from the outset.
- 3.13 The Plan outlines how Car Parking Design and Management Plans should provide details of how initial and future provision of disabled persons parking spaces will be made, managed and enforced. They should show where spaces should be located and demonstrate how the level of availability will be advertised to residents prior to occupation to inform their housing decision.
- 3.14 Where a bay is to be marked up and personalised for a particular resident, this should be done prior to occupation. Details should be provided of how existing or future residents would request a bay, how quickly it could be created and what, provision of visitor parking for disabled residents is available. Any space safeguarded for future disabled parking may not be used in the interim for general parking.

Evidence base for Draft London Plan

- 3.15 A separate evidence base document produced for the London Plan outlines the rationale for the proposed standards for residential disabled parking. It highlights the importance of a flexible approach which allows Blue Badge parking to be provided where it is needed. The document notes that 2.8 per cent of Londoners hold a Blue Badge which is reflected in the requirement for a disabled persons parking bay from the outset per three per cent of dwellings. In Southwark, 2.2% of the population hold a Blue Badge. Not all people with reduced mobility are Blue Badge holders – evidence within the document estimates that Blue Badge holders represent between 24% and 30% of disabled people in the borough. It is also noted that where the proportion of Blue Badge holders is lower, it tends to be in areas that are less car dependent and more densely developed, meaning local amenities are easier to access and public transport more of a viable option.
- 3.16 Beyond this initial requirement, developments are required to identify how further disabled persons parking bays to a total of one per ten per cent of dwellings would be provided, reflecting the requirement for 10 per cent of new dwellings to be accessible or adaptable.

Accessible London Supplementary Planning Guidance (SPG) (2014)

- 3.17 The ‘Accessible London’ SPG provides advice to boroughs, developers, designers and planning applicants on implementing inclusive design principles effectively and on creating an accessible environment in London, with emphasis on the access requirements of disabled and older people.
- 3.18 An extract is included from ‘Blue Badge parking standards for off-street car parking’ (2006) which states that although PTAL is increasingly being used to identify an appropriate level of parking; the PTAL methodology does not take account of inaccessible underground or rail stations or other barriers to movement. Accessibility for disabled people should therefore be within the context of the Social Model of Disability⁹ as part of Transport Assessments.
- 3.19 SPG Implementation Point 19 in relation to residential parking states that “*developers and boroughs should ensure that the design of parking bays are in accordance with the requirements of the GLA’s Housing SPG in terms of Lifetime Homes standards and Wheelchair Accessible Housing requirements.*”
- 3.20 Parking enforcement is outlined in SPG Implementation Point 20 where measures to ensure that provision equates to demand from disabled users (including allocation of bays versus wheelchair accessible residential units) and that disabled parking bays are effectively enforced, include:
- applicants should identify how they will monitor and review parking provision for disabled persons in their car parking management strategy; and
 - boroughs are encouraged to address this in any planning conditions and s106 agreements relating to car parking management.

⁹ The social model of disability explores ways of removing barriers that restrict life choices for disabled people, where disability is caused by way of society rather than a person’s impairment or difference.

Overview

- 3.21 Disabled parking has significantly greater emphasis in the Draft London Plan (2017) compared to the current London Plan (2016), where 'adequate disabled parking' is required for new residential developments. The 'Accessible London' SPG sets out the details for accessible parking for reference in the London Plan, responding to accessibility and equality requirements.
- 3.22 The number of disabled parking spaces per new development has reduced from 10% (aka 1 space per wheelchair accessible unit) to 3% in the Draft London Plan, where at least one designated disabled persons parking bay is provided per dwelling for 3% of dwellings from the outset.

Review of policy approaches in other inner London boroughs

- 3.23 In accordance with the London Plan (2016), residential parking policies in all inner London borough prioritise car-free housing development in areas of high public transport accessibility. Policies in each borough include provisions for disabled parking with various approaches taken:
- In **Lambeth**, the policy is for disabled parking provision in accordance with London Plan standards, providing minimum disabled parking as a proportion of total parking provision. The policy requires disabled parking spaces to be leased to residents in accordance with an approved parking management plan, not to be sold per individual residential unit.
 - In **Camden**, the policy adopted in 2010 was to provide one disabled space for each wheelchair-accessible dwelling and, for general housing, one disabled space per 20 units (for housing above 10 units, depending on likely nature of occupancy). The recently adopted Local Plan (2017) allows Blue Badge holders to use parking spaces in Controlled Parking Zones without a permit and specifies one accessible space per 10 general purpose dwellings.
 - In **Islington**, developments are generally expected to be car-free, except disabled parking. On-street disabled parking provision is preferred to off-street parking on the site and, where there is insufficient space for either on or off-street disabled parking, a financial contribution to accessible transport initiatives may be requested. In new developments, 10% of units are required to be wheelchair accessible and for each to have an accessible parking bay.
 - In **Tower Hamlets**, at least two disabled parking spaces (or 10% of total parking, whichever is greater) are required at developments with off-street parking. For developments with no off-street parking, one space is required on site and where this is not feasible, it must be demonstrated that a disabled person can park to use the development with ease. The New Local Plan up to 2031, sets out that parking for disabled people should comply with standards in the London Plan with necessary provision made on-site. However, this document is not yet adopted by LBTH.
 - In **Wandsworth**, disabled parking is provided in accordance with the London Plan.

3.24 **Table 3.1** summarises the planning requirements for residential disabled parking in Southwark and similar London boroughs.

Table 3.1: Residential Disabled Parking Standards per London borough/London Plan

| Policy Standard | Residential Disabled Parking Standard |
|--------------------------|---|
| Southwark | Provide accessible car parking spaces up to a maximum of one car parking space per wheelchair accessible unit. |
| Lambeth | Comply with London Plan standards for forms of parking including for cycles, motor-cycles, cars for disabled people, electric vehicle charging points and coaches. |
| Camden | Wheelchair housing: 1 space per dwelling. General housing: Above a threshold of 10 units, 1 space per 20 units or part thereof, with dimensions suitable for use by people with disabilities. |
| Islington | One accessible parking bay, wherever possible on street, for every wheelchair accessible home provided or 10% of all new housing, calculated against the number of habitable rooms. |
| Tower Hamlets | Development with off-street car parking: 2 spaces or 10% of the total parking (whichever is greater). Development without off-street car parking: 1 space on-site. Where site constraints mean provision is unfeasible or not safe, development will be required to demonstrate how a disabled person can park to use the development with ease. In the New Local Plan (closed for consultation) Parking for disabled people should comply with standards in the London Plan with necessary provision made on-site. Where site constraints mean provision is unfeasible or not safe, development will be required to demonstrate how a disabled person can park to use the development with ease. |
| Wandsworth | Minimum disabled parking spaces are provided in accordance with the London Plan. |
| London Plan (2016) | 10% of all new housing should be wheelchair accessible and therefore the equivalent amount of car parking for disabled users should be provided. |
| Draft London Plan (2017) | Residential development proposals delivering ten or more units must as a minimum: ensure that at least one designated disabled persons parking bay per dwelling for 3% of dwellings is available from the outset. |

3.25 As **Table 3.1** above sets out, the allocation of disabled spaces varies per borough, where Wandsworth and Lambeth apply London Plan standards, the current Tower Hamlets standards are based on 10% of total on-site parking or one space where on-site parking is not provided. Camden, Islington and Southwark allocations are based on the provision of wheelchair accessible units per residential development.

Accessible homes

3.26 Under existing planning regulations, there are requirements for the proportion of homes that should be accessible, but no requirement that these accessible homes are inhabited by disabled people.

3.27 As noted in *Wheelchair accessible housing, Best Practice Guidance*, Mayor of London September 2007, while The London Plan seeks to ensure that 10 per cent of all new housing is wheelchair accessible or easily adaptable for residents who are wheelchair users, not all new homes, particularly in the private sector, will necessarily be occupied by a disabled person from the outset. The aim of the London Plan policy is to ensure that at least 10 per cent of all new homes are designed from the outset to be easily adaptable for occupation by a disabled person at a later date.

- 3.28 *Supplementary Planning Guidance (SPG) 'Accessible London: achieving an inclusive environment' published in April 2004 provides detail on implementation. SPG Implementation Point 13: Wheelchair Housing, states that "In all housing developments, including conversions and change of use, the Mayor will, and boroughs should, seek to ensure that 10 per cent of the units are designed to be wheelchair accessible, or easily adaptable, for residents who are wheelchair users. This percentage should be applied to both market and affordable housing, should be evenly distributed throughout the development, and cater for a varying number of occupants."*
- 3.29 There are no policy requirements in The London Plan, nor in the Southwark Local Plan, to ensure that accessible homes are inhabited by disabled people.

Case studies

- 3.30 The disabled parking standards of other inner London boroughs, the existing London Plan and the New London Plan were applied to a sample of sites of more than 100 residential units in Southwark. The sites selected are as follows:
- Corio New Homes, Site bounded by Grange Walk, Grange Yard and the Grange;
 - Maple Quays, Site A Canada Water;
 - Merkle, Century House;
 - Bourne New Homes, Site bounded by Grange Walk, Grange Yard and the Grange;
 - Elephant Park, One the Elephant, Former Elephant and Castle Swimming Pool;
 - Raglan House, Former Castle Industrial Estate;
 - Trafalgar Place, Land bounded by Victory Place to the North, Balfour Street to the East and Rodney Road to the South and West; and
 - The Exchange, Bermondsey Spa Site C5.
- 3.31 **Table 3.2** illustrates the number of units and standard and disabled car parking allocated per residential development.

Table 3.2: Case Study Sites for Disabled Parking Assessment

| ID | Address | No. of Residential Units | Wheelchair Accessible Homes | Allocated Residential Disabled Spaces |
|----|--|--------------------------|-----------------------------|---------------------------------------|
| 1 | Corio New Homes, Site bounded by Grange Walk, Grange Yard and the Grange, London, SE1 | 212 | 21 | 21 |
| 2 | Maple Quays, Site A Canada Water, Surrey Quays Road, London SE16 | 668 | 69 | 36 |
| 3 | Merkle, Century House, 82-84 Tanner Street and 62 Riley Road, London SE1 | 154 | 18 | 18 |
| 4 | Bourne New Homes, Site bounded by Grange Walk, Grange Yard and the Grange, London, SE1 | 167 | 17 | 17 |
| 5 | Elephant Park, One the Elephant, Former Elephant and Castle Swimming Pool, 22 Elephant and Castle, London SE1 | 284 | 23 | 23 |
| 6 | Raglan House, Former Castle Industrial Estate, Elephant Road, London, SE17 1LA | 373 | 38 | 42 |
| 7 | Trafalgar Place, Land bounded by Victory Place to the North, Balfour Street to the East and Rodney Road to the South and West, London SE17 | 235 | 24 | 24 |
| 8 | The Exchange, Bermondsey Spa Site C5, Grange Walk, London, SE1 3EL (Site bounded by Spa Road Neckinger & Grange Walk) | 205 | 20 | 20 |

- 3.32 For purposes of comparison, the disabled parking standards of other London boroughs, the existing London Plan and draft London Plan were applied to each development as shown in **Table 3.3**. Cells in the table are colour-coded as follows: red if application of the relevant standard produces a higher number of spaces than application of the Southwark standards, green if lower, and amber if equal.

Table 3.3: Disabled Parking Requirements per London borough/London Plan (Case Study Sites)

| ID | Allocated Disabled Spaces | Policy Standards | | | | | | | |
|----|---------------------------|--------------------|--------------------------|---------|-----------|------------|--------|---------------|-----------|
| | | London Plan (2016) | Draft London Plan (2017) | Lambeth | Islington | Wandsworth | Camden | Tower Hamlets | Southwark |
| 1 | 21 | 21 | 6 | 21 | 21 | 21 | 21 | 13 | 21 |
| 2* | 36 | 67 | 20 | 67 | 69 | 67 | 69 | 17 | 69 |
| 3 | 18 | 15 | 5 | 15 | 18 | 15 | 18 | 7 | 18 |
| 4 | 17 | 17 | 5 | 17 | 17 | 17 | 17 | 4 | 17 |
| 5 | 23 | 28 | 9 | 28 | 28 | 28 | 28 | 5 | 23 |
| 6 | 42 | 37 | 11 | 37 | 38 | 37 | 38 | 4 | 42 |
| 7 | 24 | 24 | 7 | 24 | 24 | 24 | 24 | 2 | 24 |
| 8 | 20 | 21 | 6 | 21 | 21 | 21 | 21 | 4 | 20 |

* For site 2 provision is lower than required by policy. According to development planning documents the development proposed 174 car parking spaces (36 of which were proposed as disabled parking bays, in excess of UDP policy requirement of 10% of 17 spaces). The UDP policy document (no longer in use) was based on a 10% proportion of allocated car parking spaces as opposed to a proportion of residential units.

- 3.33 **Table 3.3** also illustrates that the policy standards for the London Plan, Lambeth, Islington, Wandsworth, Camden and Southwark are all consistent, typically offering an allocation of disabled parking spaces to match the quantum of wheelchair accessible homes per development. The standards for Tower Hamlets are significantly lower as they are based on 10% of the total residential parking allocated, rather than the number of wheelchair accessible homes. As a result, the quantum of spaces required is less. Similarly, where new developments are car-free, the disabled parking allocation will be one space on-site, regardless of the number of residential units and wheelchair accessible units proposed. Despite this, the New Local Plan sets out that disabled parking should be allocated in accordance with the London Plan, therefore the standards are likely to cohere with those shown for Lambeth.

4 Stakeholder feedback

4.1 Relevant contacts at each of the case study sites were approached for interview. The topic guide is shown in full and included the following key topics:

- allocation of disabled bays;
- enforcement of disabled bays;
- issues experienced in management of disabled bays; and
- views on whether policy standards specifying the number of bays are appropriate.

4.2 For each case study site successfully contacted, an interview was undertaken with individuals responsible for managing disabled parking and observations surveys arranged. Given the limited contact information available, it has proved difficult to find and speak to appropriate contacts. However, feedback was obtained from six of the eight sites in scope which were suggested for consultation by LBS.

4.3 The key feedback obtained is summarised in Table 4.1. In summary, the consultation with stakeholders managing car parking at residential developments found:

- Accessible units are not always inhabited by disabled people. Where disabled parking is allocated to individual accessible units, this may result in use by non-disabled people. This has the result of facilitating car ownership by non-disabled people in areas where planning policy is to restrict car ownership and encourage car-free living.
- Equally, disabled people including Blue Badge holders who require a disabled bay may inhabit non-accessible properties which do not have a disabled bay allocated. It can therefore prove difficult to provide appropriate parking in sites where the disabled bays are allocated to individual accessible units and not available for use by other residents.
- Where disabled bays are not being used, they may be used for other purposes such as accommodating contractor vehicles, as outlined by one stakeholder. However, this may also be encouraging undesirable car use (contractor vehicles may include private cars used by contractors for commuting as well essential vans, light goods vehicles etc.).
- There is a need to consider parking for carers of disabled people, though given that carer visits are often for short stays, consideration these may be better catered for through on-street parking. Some stakeholders consulted noted that carer visits could usually be accommodated by using bays of other residents on the site.
- Where disabled bays are allocated to individual properties that are then inhabited by non-disabled people, this can have the effect of increasing the attractiveness of accessible properties to non-disabled people – the provision of a parking may act as an incentive for non-disabled people to buy/rent those properties and to own a car. Building management companies do not necessarily have information about whether users of disabled bays are disabled or not. Properties are sold/let by agents and there is no requirement for them to

be sold/let to disabled people. Therefore building managers only know which spaces are allocated to which properties, not whether they are disabled users. Disabled parking bay users within private residential car parks do not need to show a Blue Badge (this would prevent them from using their Blue Badge when travelling in the car of a friend or relative) so it cannot be established by observation whether bays are being used by disabled people.

Table 4.1: Summary of feedback from stakeholders

| Development | Bay allocation | Enforcement | Views on level of provision |
|-------------|--|--|---|
| A | <p>Bays are allocated to accessible properties. Each parking space has a number which corresponds to a specific residential unit.</p> | <p>The development has only recently become operational, no issues regarding misuse of disabled parking have yet materialised.</p> | <p>There are more disabled parking spaces provided on-site than user demand.</p> |
| B | <p>Each space, including disabled bays, is owned/rented by a particular apartment. There is a maximum of one bay per flat though if given notice, spaces can be reserved for carers.</p> <p>Spaces are sold with flats which means that a resident may own a disabled space whether or not they are disabled if it comes with their flat.</p> <p>There is no provision for Blue-Badge holding disabled residents of non-accessible properties to request a disabled parking bay. As all spaces have been allocated to individual properties, there are no spaces available that could be made available for such requests.</p> <p>Some residents sub-let their parking space to other residents.</p> | <p>Aside from the allocation of disabled bays to non-disabled residents of accessible properties, there was not thought to be misuse of disabled spaces in particular. The issue generally arises when one person parks in the wrong space leading to a domino effect. This is resolved by contacting the concierge who can arrange for the initial wrongly parked car to be re-parked.</p> <p>As there are some disabled bays which have been allocated to non-disabled residents of accessible units, it is not possible to enforce disabled bays to ensure use only by disabled people.</p> | <p>The building manager consulted felt that there was not a strong demand for disabled bays from disabled people on the site. Often they were used by carers making visits.</p> |
| C | <p>Residents of the accessible units use the spaces, there is no requirement that those units are sold or let to disabled people.</p> <p>All parking is allocated per individual residences. If a person who has a parking spaces decides to move, the person purchasing the unit will also acquire the parking space.</p> <p>Not all flats have parking spaces. If a new resident of a non-accessible flat is disabled, they will be allocated a space. If this is temporarily unavailable, they will be assigned another space of convenience in the interim. This has only happened once three years ago, upon opening.</p> | <p>A Parking Management company manages the car park on a twenty-four hour basis and will issue penalties to any unauthorised parking,</p> | <p>It is considered that there are more than enough disabled parking bays at present. Unused disabled parking spaces are being used by on-site construction workers at present.</p> <p>Provision seems quite high however, it is important that the demand is accommodated on-site.</p> |

| Development | Bay allocation | Enforcement | Views on level of provision |
|-------------|--|---|--|
| D | <p>Disabled persons only can use the disabled bays. They must be a Blue Badge holder and live in one of the accessible homes. A key fob is required to access the bays.</p> <p>Spaces are allocated to individual residences. If residents do not reside in an accessible home, then they do not get a space</p> | <p>L&Q manage the building and the parking. There is security on-site. Warnings are issued for improper use – e.g. signage is put up to remind residents that the bay is designated to particular resident. Continuous improper use will result in the issue of fines/penalties.</p> | <p>A site visit undertaken at 4pm on a weekday found that most bays were empty. According to the concierge, this is typical of other periods of the day.</p> |
| E | <p>The site is not yet operational.</p> <p>There are 39 disabled parking bays on-site.</p> <p>The disabled bays are allocated to individual residence. Each bay has a designated ‘owner’. The disabled bays are allocated to residents living in the accessible homes. A key fob is used to access the on-site car parking.</p> <p>Disabled bays are allocated to residents of the wheelchair accessible homes only. Any persons (disabled or not) who are not in the accessible homes cannot be allocated an accessible space. Such residents would have to make arrangements with the Council.</p> | <p>There is 24 hour security on-site, including CCTV and roaming check passes. There is also a computer based programme which can monitor vehicle/resident arrivals and departures etc. if any trouble ensues.</p> <p>Should any person misuse the parking facilities (standard or disabled parking), fines will be issued. A local company will be hired to issue penalty notices when the site becomes operational.</p> | <p>The Developer wants to change some spaces to standard parking spaces but is in conversations with the Council at present.</p> |
| F | <p>Around a third of the spaces are disabled bays. Spaces are allocated to individual residences who may not be disabled.</p> | <p>Key fob entry is required.</p> | <p>During a site visit at 4pm on a weekday, 16 of 24 spaces were occupied and, according to the concierge consulted, this is typical of other periods</p> |

Observation surveys

- 4.4 Discussions with building managers established the bay allocation approach. In those discussions, it became apparent that accessible units may be sold or let to anyone, regardless of whether they are disabled. Where disabled bays are allocated to an individual accessible unit, they tend to be used, either by the resident of the unit or sub-let to other residents. As such, undertaking occupancy surveys would not establish the level of demand or use by disabled people.
- 4.5 Given the nature of these discussions, which identified that disabled bays were allocated to non-disabled people at most sites, the surveys undertaken focused on assessment of the bay design.
- 4.6 Site visits were undertaken at two sites: Site B and Site D.

Site D

- 4.7 Disabled parking bays are clearly marked with a yellow wheelchair symbol within the parking bay, accompanied by cross-hatching to the rear and the driver's side in line with Department for Transport Traffic Advisory Leaflet (TAL) 5/95. Vehicles were observed to park within the bays, not on the hatching.

Figure 4.1: Disabled parking bays at site D

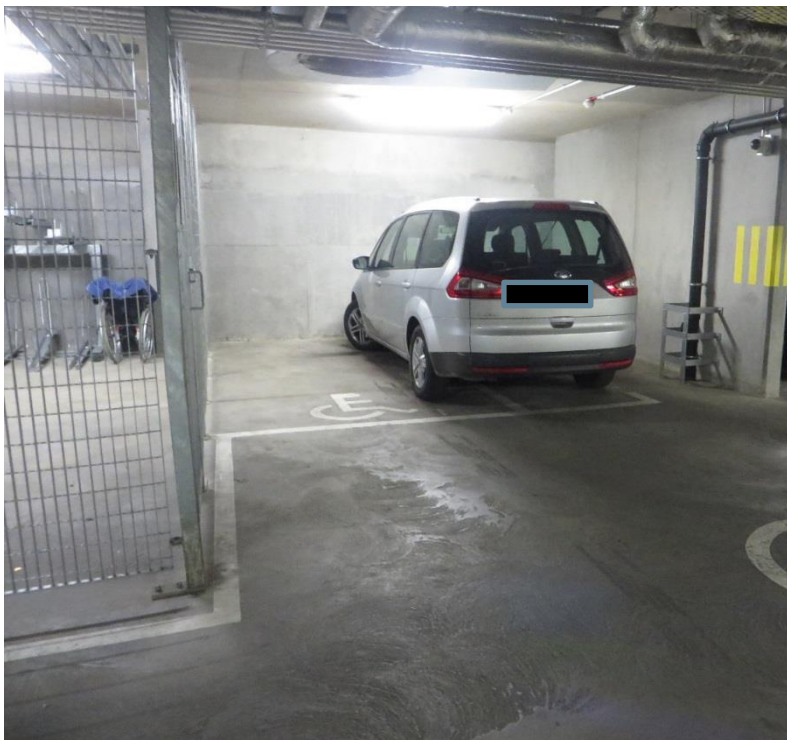


Site B

- 4.8 At Site B, bays were also marked with a wheelchair symbol within the bay and accompanied by an area to the side of the bay in line with TAL 5/95. However, this area was not hatched as clearly and there was evidence of mis-use of the side area. In the second image in Figure 4.2, the vehicle has been parked in the side area, presumably to avoid conflict with the access door for the cycle

adjacent cycle store. The area used for a disabled bay in this image is less suitable as a disabled parking bay due to space limitation and access requirements for the cycle store. Such arrangements could be interpreted as evidence of developers “squeezing in” disabled bays to meet planning requirements. Given the use of disabled bays by non-disabled people identified at the site, such spaces may not be essential and could be used for other purposes. Such uses could include additional cycle parking, cycle maintenance stands or storage lockers.

Figure 4.2: Disabled parking bays at site B



5 Conclusions

- 5.1 Since the original planning guidance was developed, the following key trends have occurred:
- **Southwark residents are less car dependent:** Car ownership by households remains static but the overall number of cars registered in the borough has declined. The use of cars for travel to work has decreased from 14% of trips to 10% of trips.
 - **The proportion of the population with reduced mobility has remained relatively static** and is expected to stay at around one in ten of the population. Not all people with reduced mobility qualify for a Blue Badge that would allow them to use disabled parking bays – only 2% of the population hold a Blue Badge. According to Department for Transport statistics, there are 7,000 Blue Badge holders and the number of Blue Badges issued each year in Southwark remains relatively stable at around 2,500 to 2,700 per year.
 - **The physical accessibility of the public transport network has increased** with all buses now fully accessible including wheelchair ramps and audio/visual information provision. Nearly all bus stops offer level boarding. All Hackney Carriages in Southwark are wheelchair accessible. While there have been improvements to the accessibility of the Underground network, only half of Underground stations are fully accessible and, within Southwark, most rail stations do not provide step-free access.
- 5.2 Generally, it is more viable in 2018 for some disabled people to live in Southwark without requiring ownership of a car when compared to the period when planning guidance was drafted, though there remain barriers to Underground and rail use by disabled people due to a lack of stations with step-free access. The guidance contained within the Draft London Plan suggests lower levels of disabled parking provision, with one designated disabled persons parking bay per dwelling for 3% of dwellings. This ratio was applied to a sample of completed residential developments in Southwark to illustrate the potential change resulting from applying the new London Plan standards. Across eight sites at which a total of 201 disabled parking bays are provided, applying the standard from the London Plan would result in 69 spaces, around one third of existing provision.
- 5.3 While there are existing planning requirements for a proportion of new housing to be accessible units, there is no requirement that these units are inhabited by disabled people. Feedback from representatives interviewed at those residential sites and site visits found that, where disabled parking is allocated to individual accessible units, this may result in use of disabled bays by non-disabled people. This can have the effect of increasing the attractiveness of accessible properties to non-disabled people – the provision of parking may act as an incentive for non-disabled people to buy/rent those properties and to own a car. This in turn has the result of facilitating car ownership by non-disabled people in areas where planning policy is to restrict car ownership and encourage car-free living.

Recommendations

5.4 The following recommendations are made:

- De-couple accessible housing provision from disabled bay provision, so that disabled bays are not used by non-disabled people. As per the recommendations of the draft London Plan, The New Southwark Plan should make clear that disabled bays should not be allocated to individual accessible residences, rather that a pool of disabled parking bays is available at each site for use by any Blue Badge-holding residents (including residents of non-accessible units).
- Disabled parking in the north of Southwark, where public transport accessibility is high, could be provided at a lower level in accordance with the draft London Plan. In areas to the south of the borough, disabled bay provision could be higher to reflect the lower Public Accessibility Level (PTAL) ratings.

A Summary of inner London borough policies

London Borough of Lambeth

Local Plan (2015)

- A.1 The Lambeth Local Plan was adopted in 2015, and sets out the Council's initiatives to achieve sustainable development for the borough.
- A.2 Policy T7 –relates to parking, and the Council's aims and objectives to maintain and improve disabled parking within the borough. All new development should:
 - A.3 Provide car parking in accordance the maximum standards set out in the London Plan, reflecting on the public transport accessibility of the development site, with minimal provision in areas with high public transport accessibility.
 - A.4 Be car-free, including permit-free and permit-capped schemes, particularly in areas of high public transport accessibility and where alternative transport modes are available. In such areas, clear evidence/justification for any proposed parking is required for Council approval, and parking provision should not discriminate against any occupiers of the development.
 - A.5 Comply with London Plan standards for other parking requirements: cycle, motorcycle, coach, disabled parking and electric vehicle charging points.
 - A.6 It is important that all new developments with on-site parking provision, ensure that accessible parking is prioritised for persons who will require parking throughout the lifetime of the development. All disabled bay allocations will reflect a proportion of the total parking provision (as per London Plan/Housing SPG guidance), and are not to be added separately.
 - A.7 Where the development is car-free, the Council will ensure that parking provisions for disabled persons are not restricted. Disabled parking spaces will not be sold per individual residential unit, but leased to residents in accordance with an approved car park management plan.

London Borough of Camden

Development Policies (Adopted 2010)

- A.8 LBC’s Development Policies document contributes towards delivering the Core Strategy by setting out detailed planning policies that the Council will use when determining applications for planning permission in the borough.
- A.9 Policy DP18 – ‘Parking Standards and limiting the availability of parking’ sets out that the Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council expects development to be car-free in the Central London Area and in Controlled Parking Zones that are easily accessible by public transport.
- A.10 It is proposed that at “developments where there is a need for car parking provision, maximum standards should not be exceeded for the area in which it is located (excluding spaces designated for disabled people). Developments in areas of on-street parking stress should be ‘car capped’.
- A.11 For car-free and car capped developments, the Council will:
- limit on-site car parking to:
 - spaces designated for disabled people,
 - any operational or servicing needs, and
 - spaces designated for the occupiers of development specified as car capped;
 - not issue on-street parking permits; and
 - use a legal agreement to ensure that future occupants are aware they are not entitled to on-street parking permits.
- A.12 The residential disabled parking standards are presented in **Table A.1**.

Table A.1: London Borough of Camden – Residential Accessible Parking Standards

| Land Use | Standard |
|----------------------------|---|
| C3 Residential Development | Wheelchair housing: 1 space per dwelling, with dimensions suitable for use by people with disabilities. General housing: where justified by the likely occupancy of the dwelling and reserved for use by people with disabilities, above a threshold of 10 units, 1 space per 20 units or part thereof, with dimensions suitable for use by people with disabilities. |

Camden Local Plan (2017)

- A.13 The Camden Local Plan sets out the Council’s planning policies up to 2031 to ensures that all planning policies are robust, effective and up-to-date; and respond to changing circumstances within the borough.

Accessible and adaptable dwellings (Lifetime Homes) and wheelchair user dwellings

- A.14 The Council expects all new developments to be car-free, however, the parking needs of wheelchair users will be met, on-street or in suitably located off-site parking to serve wheelchair accessible dwellings, particularly large wheelchair accessible dwellings (three or more bedrooms).

Policy C6 – Access for us

- A.15 The Council seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities, including secure car parking for disabled people.
- A.16 The Council requires all relevant planning applications to demonstrate how the needs of disabled drivers have been addressed. The Council will support the provision of disabled parking and drop-off facilities which are integrated with public transport facilities.

Policy T2 – Parking and car-free development

- A.17 The Council will limit parking availability and require all new developments to be car-free. They will:
- not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
 - limit on-site parking to:
 - spaces designated for disabled people where necessary, and/or
 - essential operational or servicing needs.
- A.18 The Local Plan sets out that all new residential developments should be car-free. In this instance, no parking spaces are provided within the site other than those reserved for disabled people and businesses and services reliant upon parking, operational and/or servicing requirements (e.g. emergency services, storage and distribution uses). Current and future occupiers will not be issued with on-street parking permits.
- A.19 Parking for disabled people should be provided where it can be demonstrated as necessary, taking into account existing availability of on-street parking for Blue Badge holders.

Camden Planning Guidance – Transport (CPG 7) (2017)

- A.20 The Camden Planning Guidance was prepared by LBC to support the policies of the Local Development Framework. It forms a Supplementary Planning Document (SPD) which is an additional “*material consideration*” in planning decisions, consistent with the Core Strategy and the Development Policies.
- A.21 Chapter 5 refers to car-free and car-capped developments. Car-free developments have “*no parking within the site and occupiers are not issued with on-street parking permits*”. Car-capped developments have “*a limited amount of on-site car parking, but no access to on-street parking permits*”.
- A.22 Car-free and car-capped developments should however, be designed to consider the needs of disabled car users. Blue Badge holders will be able to use parking spaces in Controlled Parking Zones without a parking permit.
- A.23 Minimum parking standards apply to disabled parking, where one accessible space is allocated per 10 dwellings. Where car-free and car-capped developments contain wheelchair housing, LBC will provide a parking space per dwelling.
- A.24 Where a disabled resident moves in to a development in need yet without an off-street parking space, LBC will consider a request for a designated disabled space on-street whether the development is formally car-free or not.

- A.25 Chapter 6 sets out the key objectives for on-site car parking, with reference to the dimension and layout of spaces, including dedicated spaces for disabled users.
- A.26 The minimum standard dimensions per off-street disabled car parking space is 3.3m wide by 4.8m deep. This is in accordance with the Mayor's Draft London Housing Design Guide SPG (July 2009), which states that "Each designated wheelchair accessible dwelling should have a car parking space 2.4m wide with a clear access way to one side of 1.2m wide".

London Borough of Islington

Core Strategy (2011)

- A.27 The Core Strategy vision is for the borough to be a place where real change is achieved to create a stronger and economically, environmentally and socially sustainable community.
- A.28 The document highlights that high levels of traffic congestion are experienced on roads in the borough which means that future developments are generally expected to be car-free, with no parking or parking permits allocated unless in exceptional circumstances. Car-free development means no parking provision will be allowed, except for disabled parking.
- A.29 In recognition of increasing housing options and availability for disabled people, the Council requires a proportion of all new residential development to be fully wheelchair accessible, in line with the London Plan.

Development Management Document (2013)

- A.30 The Development Management Document sets out objectives for positive and proactive ways to shape, consider, determine and deliver development proposals.
- A.31 Policy DM8.5 refers to vehicle parking where it sets out that no provision for vehicle parking or waiting will be allowed for new residential developments, excluding drop-offs and accessible parking. Developments are required to provide mobility scooter storage and charging.
- A.32 On-street accessible parking is encouraged in preference to on-site spaces. The developer shall identify and negotiate the cost of provision secured by a Section 106 legal agreement. Where there is insufficient space to accommodate on-street or on-site spaces, a financial contribution shall be made towards investment in accessible transport initiatives, where it is considered that this would make development acceptable in planning terms.

Planning Obligations (Section 106) (2016)

- A.33 This Supplementary Planning Document provides detail on the Council's policies on planning obligations and of the procedure for agreeing planning obligations.
- A.34 LBI requires adequate provisions to be made for accessible parking and transport arrangements to ensure that its car free policy does not disadvantage older or disabled people, children and families. The Council therefore seeks the provision of one accessible parking bay, wherever possible on-street, for every wheelchair accessible home, based on the following formula:

$$\text{Number of wheelchair accessible units (10\% of all habitable rooms)} = \text{number of accessible parking bays required}$$

- A.35 Developments should also provide adequate mobility scooter storage, charging, safe drop-off, and concessionary car club membership. Car-free developments should consider a full range of personal and public transport alternatives and accessibility within the Transport Assessment and Design and Access Statements.

London Borough of Tower Hamlets

LBTH Managing Development Document (2013)

- A.36 The MDD provides Development Management planning policies and site allocations to meet the Strategic Objectives outlined in the Core Strategy. Relevant policies include DM22, where developments are required to comply with the parking standards shown in **Table A.2**. In areas where PTAL and/or on-street parking stress is high, developments should be permit-free.

Table A.2: London Borough of Tower Hamlets – Parking Standards

| Parking Provision | Minimum Standards |
|--|--|
| Development with off-street car parking | 2 spaces or 10% of the total parking (whichever is greater). |
| Development without off-street car parking | 1 space on-site. Where site constraints mean provision is unfeasible or not safe, development will be required to demonstrate how a disabled person can park to use the development with ease. |

- A.37 Permit-free development may contain some parking on-site however, on-street parking is not permitted. Car-free and permit-free developments will provide parking for disabled residents and servicing.

A Review of Car and Cycle Parking Standards for Tower Hamlets Council’s Managing Development DPD (2011)

- A.38 This document sets out a series of options for reviewing the car and cycle parking standards applied to new developments in the borough. This review follows commitment made in the Council’s Local Implementation Plan (LIP2) to review the appropriateness of parking standards.
- A.39 Residential and office land uses are forecast to have the greatest impact on traffic growth in the borough and were identified for reassessing the parking standards levels. All standards for other land uses, disabled parking and servicing and operational parking remain unchanged.

LBTH Draft Local Plan 2031 (November 2016)

- A.40 The Draft Local Plan presents the Council’s draft spatial vision and objectives, detailed draft planning policies and site allocations for development in the borough to 2031.
- A.41 Chapter 4 sets out the policies related to transport and connectivity. Policy TR 3 relates directly to parking and permit-free developments, and sets out the following:
- In areas of good public transport accessibility and/or areas of existing on-street parking stress, developments are required it to be permit-free.
- A.42 All parking must conform to the standards set out in **Table A.2**. Disabled accessible parking bays should be a proportion of the overall parking provision and not added separately.

London Borough of Wandsworth

Core Strategy (Adopted March 2016)

- A.43 The Core Strategy sets out the key elements of the planning framework for the borough. It contains a spatial vision and strategic objectives for the area together through a spatial strategy, strategic planning policies and a monitoring and implementation framework.

Policy PL3 – Transport

- A.44 The Council seeks to ensure that a balance is met between providing adequate parking for a development and setting a realistic limit on parking to encourage sustainable travel. Maximum car parking standards are set to restrain the growth of private car use. There has been an increasing trend for developments to offer less/no on-site car parking than the maximum, which is appropriate and desirable for town centres and other accessible locations. A balance is required however, to meet adequate off-street parking in areas of low accessibility, and for disabled residents.

Policy IS 1 – Sustainable Development

- A.45 Maximum car parking standards will be applied in line with the London Plan. Car-free developments will be promoted, particularly where there is a good level of public transport accessibility and spare capacity. Adequate off-street provision should be met in less accessible areas, and to meet provisions for the needs of specific groups, such as people with disabilities.

Development Management Policies (Adopted March 2016)

- A.46 The Development Management Policies Document sets out the Council's detailed policies for managing development in the borough.

Policy DMT 2 – Parking and servicing

- A.47 Car parking for developments should strike a balance between meeting the essential on-site requirements whilst encouraging sustainable travel and minimising on-street parking.
- A.48 Developments should seek to provide the minimum realistic amount of car parking for the site, without risk of overspill parking onto surrounding streets. Car parking allocations should consider the needs of disabled people, in terms of quantity and location.
- A.49 The Council has a long-standing policy whereby future occupants of any development of 15 residential units or more (within a CPZ or future CPZ) are automatically restricted from applying for on-street parking permits. It is now considered that 10 units or more should automatically be restricted from CPZs, due to cumulative impact of residential development causing pressure on on-street parking.
- A.50 Off-street car parking is provided subject to the maximum levels set out in **Table A.3**. At mixed-use developments, car parking spaces should be allocated proportionately per land use. In town centres and areas of good public transport accessibility, there is less need for off-street car parking.
- A.51 Minimum disabled parking spaces are provided in accordance with the London Plan.

A.52 Car-free and low-car development may be permitted where:

- PTAL is high;
- there is/will be, adequate public transport capacity to accommodate development trips;
- Transport Assessments demonstrate that further car parking is not required through Car Club provision, Travel Plans or any other relevant measures; and
- minimum disabled parking spaces requirements are provided as per London Plan standards.

Table A.3: London Borough of Wandsworth – Parking Standards

| Unit Type | Amount of Parking | Relevant considerations applying to appropriate levels of parking to be provided up to the maximum level |
|-----------|---|---|
| 1-2 Bed | Refer to the London Plan (2016) (Table 6.2) | <ul style="list-style-type: none"> • A lower level of provision may be justified in areas well served by public transport, particularly for non-family accommodation, live/work accommodation, dual/interchangeable business/housing use and housing for specialised needs. • The physical constraints of the site, especially in the case of infill and backland schemes or changes of use. • The impact on the street scene and adjoining properties particularly in conservation and other sensitive areas. • Existing on-street parking conditions. • The provision of car club parking to serve the development and surrounding area. • Any specific characteristics of the likely occupants as in the case of specially managed special needs housing or sheltered housing. • Refer to Policy DMT2 for situations in which car-free or low-car development may be permitted. |
| 3 Bed | | |
| 4+ Bed | | |

Summary

A.53 In summary, there is a clear cohesion between the local borough standards to encourage a shift away from private car ownership shift towards sustainable travel, through increased provision of car-free or car-capped developments. In areas of high public transport accessibility, the requirement for on-site parking is limited to operational servicing and disabled parking.

A.54 All London boroughs agree that new residential developments should provide disabled parking provisions, regardless of whether a development is car-free or car-capped.

A.55 The level of disabled parking provision per London borough is compared in Chapter 4, to understand whether LBS standards cohere to other Inner London boroughs and the regional policies set out in the London Plan.

B Stakeholder interview topic guide

Introduction

Your organisation and role

Firstly, what is your role within the organisation?

What does the organisation do at that site?

Who manages car parking?

Disabled parking at your site

How many disabled parking bays for residents at that site?

Who uses the bays? (residents of accessible units?, disabled people? Other users?)

Are disabled bays allocated to individual residences or shared?

How do users qualify to use the spaces? What access arrangements are there for using the disabled parking area (e.g. is there gate control, a key fob?)

How do you handle requests for use of the disabled bays? including requests from disabled residents of non-accessible units and from non-disabled residents.

Enforcement and other issues

How are the bays enforced? (are warnings, fines issued?). To what extent is there a problem of people mis-using the disabled bays?

Are there any other particular issues experienced with the bays on the site? If so, please describe.

Do you think there is are too many or too few disabled bays at your site? Why do you say that?

Southwark Council currently requires developers to provide one disabled bay per accessible unit. What are your thoughts on that requirement? What requirement would you suggest?

Surveys

We would like to visit the site in early January to undertake some observation surveys. The purpose of the surveys is to understand disabled bay usage only – the reporting will not reference individual sites and there is no element of enforcement.

Arrange day to visit

Where to go, who to report to

Sign-in / access arrangements

CONTROL INFORMATION

| | |
|---|--|
| Prepared by | Prepared for |
| Steer Davies Gleave 67 Albion Street Leeds LS1 5AA +44 113 389 6400 www.steerdaviesgleave.com | London Borough of Southwark 160 Tooley Street London SE1 2QH |
| SDG project/proposal number | Client contract/project number |
| 23252801 | SH |
| Author/originator | Reviewer/approver |
| Ian Bewick | Steven Bishop |
| Other contributors | Distribution |
| Sarah Wellington, Katie Watson | <i>Client:</i> S Hepworth <i>SDG:</i> Project team |
| Version control/issue number | Date |
| V0.9 for PD review | 5 Jan 2018 |
| V1.0 to client | 8 Jan 2018 |
| V1.1 for PD review | 15 Jan 2018 |
| V2.0 to client | 15 Jan 2018 |
| V3.0 FINAL to client | 18 Jan 2018 |



013

