

MAYOR OF LONDON

**Blue badge parking standards for
off-street car parking**

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Greater London Authority
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The views expressed in this report are those of the consultants and do not necessarily represent those of the Greater London Authority.

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Executive Summary

This report provides the results of a piece of research that was carried out to investigate off-street parking standards for disabled people. The results of the study were used by the GLA's London Plan team in their review of the London Plan. The key findings of the study used by the London Plan team were:

- London Boroughs should consider local issues and estimates of local demand when setting appropriate standards for Blue Badge parking;
- London Boroughs should develop a monitoring and enforcement strategy to prevent the misuse of spaces;
- Developments should have at least one accessible on or off street car parking space. This advice moves away from percentage or floorspace figures which can result in no accessible space provision when no parking is provided within a development;
- When one or less parking spaces are provided within a development, the location of accessible spaces within the locality should be demonstrated;
- A case study report should be produced to highlight good practice regarding Blue Badge parking provision.

In addition this study will be used by the GLA in assessing planning applications and LDF's and by boroughs to assess future planning applications.

This study has assessed, using evidence based research, current guidance on off-street parking standards for Blue Badge holders in the context of all land-use developments using the 'Social Model of Disability'.

The objective of the study is to ensure that the London Plan policy on parking standards ensures equal and dignified access to all new developments in London by disabled people.

Research into Blue Badge parking issues not only will inform the London Plan review but also Transport for London's Transport Strategy.

Within a Social Model of Disability framework the project has used evidence based research to understand better the challenges disabled people experience when parking in London. This information combined with a thorough review of existing literature and parking guidance documents, forms the basis of this report.

1 Introduction

- 1.1. JMP Consulting and Future Inclusion have been commissioned by the Greater London Authority and the London Development Agency to review the London Plan¹ parking standards for disabled people in off street car parks.
- 1.2. The project research has been undertaken within a 'Social Model of Disability' framework (explained further below).
- 1.3. The objective of the study was to ensure that the London Plan policy on parking standards ensures equal and dignified access to all new developments in London by disabled people. The aim of the research is to inform the review of the London Plan (an updated version is to be released in 2008) regarding parking standards for disabled people and to provide advice to the Planning Decisions Unit in their assessment of strategic planning applications. This project has paid particular regard to:
 - National standards for all building types.
 - London Borough standards used in UDPs/LDFs.
 - Parking for disabled people in residential schemes where the policy is to achieve 10% wheelchair provision, and 100% Lifetime Homes², particularly in relation to high density schemes and basement car parks.
 - The impact of the use of indicative floor space standards for different building types versus percentages in an environment of parking restraints.
- 1.4. This document contains a review of Blue Badge parking standards from a research, policy and case study perspective. The term 'Blue Badge' parking is used to mean parking spaces that only people who hold a Blue Badge are permitted to use. For the purpose of this document (except where specified). 'Blue Badge' includes the four inner London Boroughs who issue an alternative colour badge (see paragraph 2.2). Parking spaces reserved for Blue Badge holders do not necessarily qualify as "accessible parking", which is used in this document to mean parking spaces that are designed to current access standards (e.g. BS8300³) – for example, with sufficient space at the side to open the vehicle door fully. These parking spaces may or may not be restricted to Blue Badge holders.

Social Model of Disability

- 1.5. Unlike previous research, which has tended to be undertaken within a Medical Model framework where disabled people are viewed as having 'something wrong' with them and therefore unable to participate effectively in society, this research was undertaken within the framework of the Social Model of Disability.
- 1.6. The Medical Model leads to a 'cure or care' approach to disability: where a disabled person cannot be 'cured' so that they can participate normally, they should be cared

for. The Social Model asserts that it is society which needs to adapt to the needs of people with impairments, by the removal of barriers that prevent disabled people from accessing opportunities and from being fully included.

- 1.7. A key difference is in where the 'problem' lies. Within the Medical Model, a disabled person's 'disability' is their own problem and they must adapt to society's norms. Their impairment restricts them from taking a full role within society and is thus what disables them. So disability results from the impairment of the individual and their need to adapt to fit into society.
- 1.8. Within the Social Model, a person becomes disabled when society does not take account of their needs. The barriers that prevent people with impairments participating fully in society are the things that disable them. So disability results from social barriers and not from impairment.
- 1.9. The Social Model of Disability can be used to understand better the economic, environmental and cultural barriers encountered by people who have impairments - whether physical, sensory or intellectual. The type of barriers that disabled people encounter can be:
 - **Physical**, such as the location of the parking bays, the width of the bays, the enforcement of bays, the access from the bays into the building, the access within the building, poor lighting, or steps and stairs - these barriers may be historical, but can be removed or avoided;
 - **Information and communication**, such as the signing of bays from the entrance to the car park, lack of accessible formats, or inability to use sign language - these barriers are extremely disempowering as information and communication are basic building blocks in participation;
 - **Organisations' systems**, such as policy or working practices - these barriers should be the easiest to address but are often the most entrenched;
 - **Social norms, culture and attitudes**, such as stereotyping of people with Downs syndrome as loving - these barriers are often perpetuated through negative imagery in the media.
- 1.10. To illustrate: some people with visual impairments need information provided other than in standard print - for instance, Braille - and if only standard print is available, that is a barrier that prevents them from fully participating in society. The Social Model solution would be to provide the information in the appropriate format, so that they had equal access to it.
- 1.11. The Medical Model research that has taken place to date classifies people according to impairment type. This does not help in increasing the participation of disabled people in the life of the community. Two people with the same impairment may

have very different access needs (Braille versus large print, for instance) whilst the access needs of people with very different impairments often overlap (for instance large print for both someone with a learning difficulty and someone with a visual impairment). So, understanding the barriers that disabled people experience, and what their access needs are, provides a route to ensuring full participation.

1.12. Blue Badge provision sits uncomfortably within a Social Model framework. On the one hand, Blue Badges remove one of the barriers to access, which accords with the Social Model. One of the aims of the scheme is to eliminate any discrimination that may prevent disabled people from accessing the same opportunities as non-disabled people. On the other hand, they are a general solution to a range of access needs, and do not always address specific needs effectively. In addition, the issuing of Blue Badges is on a purely Medical Model basis. Blue Badges are issued by the local authority, as of right to recipients of various disability benefits and, subject to the local authority's discretion, to others with mobility impairments. This means that many disabled people who are unable to use public transport because of other passengers' attitudes, or because of difficulty in understanding bus routes, for example, but who do not have a mobility impairment, such as someone with learning difficulties, will not be eligible for a Blue Badge.

1.13. In this research, for simplicity, we have assumed that Blue Badge holders are disabled by a lack of suitable parking provision according to the Social Model. A clear understanding of the different access needs of Blue Badge holders is a gap in the research and cannot be inferred from the mere possession of a Blue Badge because of the Medical Model nature of the issuing process. However, the following issues are recognised as creating barriers:

- The availability of parking spaces in general.
- The size and location of bays.
- The proximity of bays to the destination.
- Access provision to and within the building, including the accessibility of the public realm - pavements, crossings and so on.

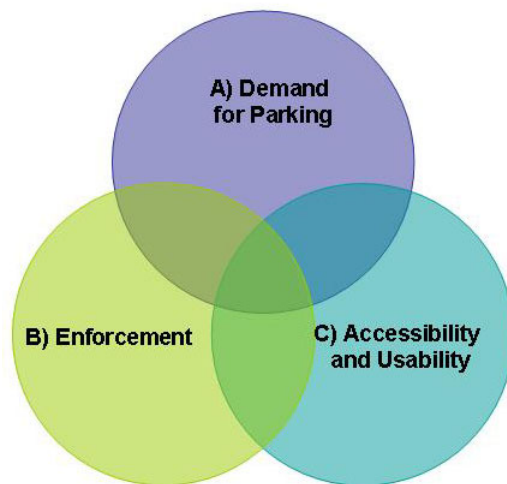
Research methodology

1.14. Set within a Social Model of Disability framework this project has used evidence based research to understand better the challenges disabled people experience when parking in London. A three stage methodology was applied to this research:

- Stage One - Literature Review
- Stage Two - Stakeholder Consultation Meeting
- Stage Three - Case Study

- 1.15. **Literature Review:** a comprehensive review of the existing literature (both published and 'grey' material), reviews of other projects that have previously taken place was undertaken as a means of understanding the context of parking standards for off-street car parks and it provided a rich source of data for the stakeholder consultation meeting.
- 1.16. **Stakeholder Consultation Seminar:** the project team organised a seminar with interested stakeholders including: disabled people and outside expert representatives from the London Access Forum, DPTAC (the Disabled Person's Transport Advisory Committee at the Department for Transport), TfL and the Blue Badge Network. The aim of the seminar was: i) to identify the needs of disabled people in relation to off-street car parking; ii) to obtain their views on existing parking standards and iii) to identify a set of recommendations for the future.
- 1.17. **Case Study:** a policy review of three London Borough's Local Implementation Plans and Unitary Development Plans was undertaken to assess the impact of the existing London Plan standards, the standards recommended by the appropriate borough and their recommended indicative parking levels.
- 1.18. This research focuses on the 3 mutually dependent key areas that were identified during the initial literature review (see **Figure 1.1**):
- The demand for Blue Badge parking spaces.
 - Enforcement.
 - Accessibility and usability.

Figure 1.1 Aspects of Blue Badge Parking



- 1.19. **The increasing demand for spaces:** Blue Badge holders generally receive a number of parking privileges, although it can vary geographically:
- Free parking in bays that have no time limit.
 - Unlimited parking in time limited bays.
 - Parking for up to three hours where there are yellow line waiting restrictions, so long as loading is allowed.
- 1.20. **Enforcement:** The literature review showed that the benefits of Blue Badges mean that they are valuable commodities and are subject to theft, forgery and fraud. Abuse of Blue Badges also takes place; particularly, it is reported, by family members. The review also showed that spaces reserved for the use of disabled motorists are misused by non-disabled people, particularly in supermarkets and bays that are located near facilities such as ATMs.
- 1.21. **Accessibility and usability:** Appropriate signage and information on where parking spaces for disabled people are available is important to users. In addition, care needs to be taken when deciding on the location of spaces to ensure that they are appropriately distributed within a parking establishment and are as close as possible to lifts, stair wells and entry points to buildings or other destination locations.

Study Context

- 1.22. The London Plan¹ (published on the 10th February 2004) is currently being reviewed. This project provides a review of the London Plan off-street car parking standards for disabled people and offers recommendations for the revised Transport Strategy.
- 1.23. Annex 4 of the existing London Plan currently states:

“35 Policy 3C.22 recognises that developments should always include provision for car parking/car-based access for disabled people. Despite improvements to public transport, some disabled people still require the use of private cars. Suitable designated car parking and/or drop-offs are therefore required”.

“36 Boroughs should take a flexible approach, but developments should have at least one accessible car parking bay designated for use by disabled people, even if no general parking is provided. All developments with associated car parking should have at least two parking bays for use by disabled people. The appropriate number of bays will depend on the size and nature of the development and boroughs should take into account local issues and estimates of local demand in setting appropriate standards. Where no off-street parking is proposed, applicants must demonstrate where disabled drivers can park in order to easily use the development. The Mayor

has published draft Supplementary Planning Guidance – Accessible London, which provides detailed guidance on accessibility for disabled people”.

Report Structure

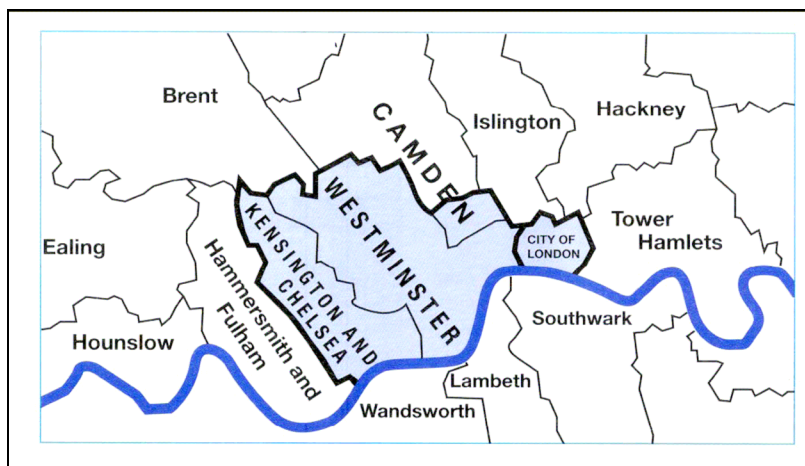
1.24. The structure of this report is as follows:

- Executive Summary
- Section 1: Introduction (this section)
- Section 2: Background Information on the Blue Badge Scheme
- Section 3: Summary of the Literature Review
- Section 4: Stakeholder Consultation Seminar
- Section 5: Desk Top Research and Case Studies
- Section 6: Fieldwork Surveys and Analysis
- Section 7: Analysis and Conclusions
- Section 8: Recommendations

2 Background Information on the Blue Badge Scheme

- 2.1. The origins of the 'Blue Badge' scheme lie in the Disabled Persons' Parking Badge Scheme of 1971, which was known as the 'orange badge'. In 1975, 1986 and 1991 the concessions and eligibility criteria were reviewed and revised. In April 2000, the EU introduced the Blue Badge scheme as a means of standardising parking schemes for disabled people across its member states. Since March 2000, 2.23 million badges were issued in the UK. Around 215,000 Blue Badge holders live in London. The number of disabled badge holders is growing as a result of demographic and other changes and is likely to grow as the average age of the population increases (Parking Forum, 2004⁴).
- 2.2. Within the UK, local authorities outside of London have varying implementation criteria and administration practices, which also differ from the general parking concessions available in Central London. Whereas, for example, a Blue Badge holder may normally park on a yellow line elsewhere, this does not apply in four of the Central London boroughs (except for up to 20 minutes in Kensington and Chelsea). The City of London, the City of Westminster, the Royal Borough of Kensington and Chelsea and part of the London Borough of Camden south of Euston Road (see Figure 2.1) do not operate the full Blue Badge Scheme due to parking pressures. Instead they offer limited concessions to Blue Badge holders. In addition, they each have their own individual schemes and offer badges to those with severe mobility impairments who live, work or study in these boroughs. Camden issues green badges, the City of London red badges, Kensington & Chelsea purple badges and Westminster white badges. These boroughs have, however, agreed to harmonise their regulations more, in order to lessen the confusion.

Figure 2.1 Central London areas where the national scheme does not fully apply



Source: DfT 'Parking in Central London for Blue Badge Holders'⁵

- 2.3. The Mayor of London has made a manifesto commitment to "harmonise concessions to national Blue Badge holders". The ALG and TfL currently sit on the DfT steering group, which is examining the central London Blue Badge Exemptions with a view to identifying opportunities for harmonisation.
- 2.4. Blue Badge holders are exempt from the Congestion Charge in Central London. Vehicles that are classified in taxation class 'Disabled' are automatically exempt from the Congestion Charge. Others can register for exemption with the relevant authority and pay a £10 fee.
- 2.5. Although the Blue Badge scheme does not apply in off-street car parks, parking spaces are typically set aside for disabled drivers and Boroughs have powers (via the 1992 Road Traffic Act regulations) to enforce parking in off street car parks.
- 2.6. To tackle misuse by non-badge holders, the Traffic Management Act 2004 gave police and parking enforcement officers greater authority to inspect Blue Badges. Abusers of the scheme could face a fine up to £1,000. The new powers came into force in September 2006.
- 2.7. This change followed a report by the London Assembly Transport Committee in 2002 suggesting such an amendment, entitled 'Access Denied? Parking in Central London for people with mobility problems' (2002)⁶. This change has been crucial as this same report states that there are fewer than 900 designated on-street parking spaces for disabled people in Central London for the city's 215,000 Blue Badge holders – this means that there is only about one reserved bay for every 240 Blue Badge holders. Besides misuse, these bays are also often at some distance from destinations and much of the parking for disabled people in Central London is time restricted. The combination of these factors signifies much frustration and a greater risk of receiving parking fines for Blue Badge holders. In addition, increased vigilance by parking inspectors realistically means that much of the West End is a no-go area for Blue Badge holders or is very expensive.
- 2.8. Although considerable progress has been made over the last five years in relation to making mainstream public transport accessible to disabled people, many people still need to use cars because of continuing lack of access to the underground network. There are some disabled people who will experience barriers to using public transport all or some of the time even if it is accessible, for example:
- In inclement weather
 - When routes to the access points are temporarily blocked e.g. by parked cars
 - If their journey will be unreasonably long or involve multiple changes (this increases the risk of experiencing equipment failure e.g. ramps on buses, lifts in stations)
 - When there is overcrowding

- 2.9. Finally, sometimes disabled people need to use their cars, like other people do, to carry families, or shopping, or just to get from A to B. The provision of parking concessions through the Blue Badge scheme removes those barriers for disabled people who have access to a car.
- 2.10. However, when disabled people use their cars, parking provision can present another barrier. Some may need parking close to a building entrance (because public transport is not accessible to them and they are unable to walk or wheel far); some may need parking (because public transport is not accessible to them) but can wheel a significant distance to an entrance (such as an electric wheelchair user).
- 2.11. Off-street parking has undergone a major policy change as local authorities shift from minimum standards to maximum standards. In other words boroughs are moving from a requirement of 'no less than' levels of parking at new developments to 'no more than'. For example Camden borough's LIP (2005)⁷ specifically states:
- "The Council appreciates the linkage to the London Plan policy 3c.1 within which is envisaged "in general, supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect levels of public transport accessibility".
- 2.12. All London boroughs will be required to move towards maximum parking standards to comply with the London Plan (and national guidance).

3 Summary of the Literature Review

- 3.1. A comprehensive review of the existing literature (both published and unpublished material) and reviews of other projects that have previously taken place was carried out as a means of understanding the context of parking standards for off-street car parks. The section below provides a summary of the key findings.

National Policy

- 3.2. **Disability Discrimination Acts 1995 and 2005**⁸: The Disability Discrimination Act (DDA) gives disabled people the right to challenge discriminatory behaviour. Part three of the DDA applies to car parking. Since December 1996 it has been unlawful for those providing a service, including those who provide car parking as part of another service, e.g. a supermarket - to treat disabled people less favourably than other people for a reason related to their disability. Since October 1999 service providers have had to make reasonable adjustments (changes to the service) for disabled people. Adjustments include changes to policies, practices or procedures, such as amending a policy to enforce the appropriate use of Blue Badge bays. Since October 2004 they have had to make reasonable adjustments to the physical features of their premises to overcome physical barriers to access – this is likely to include making parking provision for disabled people. This is an ‘anticipatory duty’ requiring service providers to remove as many of the barriers to equal service as they can in advance of disabled people’s requests for adjustments. Parking provided by local authorities and other public bodies will also be covered by the Disability Discrimination Act 2005 which placed a duty on public bodies to promote disability equality and eliminate disability discrimination.
- 3.3. The DDA 1995 requires reasonable adjustments to be made for any disabled person who is disadvantaged by an employer’s or a service provider’s arrangements because of their disability. In this report we have assumed that any disabled people who are disadvantaged by parking arrangements are Blue Badge holders, and so can use Blue Badge spaces, but this may not be the case and therefore, technically, employers and service providers who provide parking solely for Blue Badge holders may still be in breach of the DDA.
- 3.4. **Planning Policy Guidance 13 (PPG13) -Transport (2001)**⁹: encourages the integration of planning and transport at all levels. Its three main objectives are to:
- Promote more sustainable transport choices for both people and for moving freight.
 - Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling.
 - Reduce the need to travel, especially by car.

- 3.5. However, it also acknowledges that despite the wish to move away from the private car, many disabled people have no realistic alternatives. Therefore the report stresses the need to:
- Take account of the needs of disabled people, with regards to access and parking spaces. Policies that aim to reduce parking spaces must ensure that sufficient and suitable parking for disabled people is retained.
 - Acknowledge the needs of disabled people in the design, layout, physical conditions and inter-relationship of uses. In particular, town centres and residential areas must have well-defined and safe access arrangements for disabled motorists, disabled public transport users and disabled pedestrians, including those who have visual impairments.
 - Ensure developments, including transport infrastructure, are accessible to disabled people as motorists, public transport users and pedestrians, through decisions on location, design and layout.
- 3.6. Providing this accessibility is also essential to combating social exclusion, which is a growing phenomenon among marginalised groups, including disabled people.
- 3.7. **The Future of Transport (Government White Paper, 2004)¹⁰:** Though not specifically mentioning disabled people as a larger diverse group, this document acknowledges the needs of the country's changing demographics and growing proportion of older people. It states that this sector of society must be supported in its transport needs, be it driving or accessing public transport. In terms of the latter, as many people become increasingly reliant on public transport, it is crucial that it presents an accessible, reliable, affordable and safe option.
- 3.8. The Department for Transport provides a range of information and advice on access for disabled people. This ranges from a description of the Blue Badge scheme, in terms of who qualifies, how and where to use the badges, to recommendations on the specifications for accessible parking. The key guidance document is Traffic Advisory Leaflet 5/95 (TA 5/95) entitled 'Parking for Disabled People' (see Table 3.1).
- 3.9. **DfT – Traffic Advisory Leaflet 5/95 [TA 5/95]¹¹:** The TA 5/95 was created using 1991 guidelines laid out in the document 'Reducing mobility handicaps' by the Institution of Highways and Transportation. It was rooted in the former generous 'minimum' standards and uses these as a basis for its percentage guidelines. However, the standards have since shifted from 'minimum' to 'maximum' and the current aim is to provide reduced amounts or no parking at all, as a consequence these percentages are no longer meaningful.

Table 3.1 Current Parking Standards for Disabled People

Car Park Used For:	Car Park Size	
	Up to 200 Bays	Over 200 Bays
Employees and visitors to business premises	Individual bays for each disabled employee plus 2 bays or 5% of total capacity (whichever is greater)	6 bays plus 2% of total capacity
Shopping, recreation and leisure	3 bays or 6% of total capacity (whichever is greater)	4 bays plus 4% of total capacity

Source: TA 5/95

- 3.10. The DfT updated the TA 5/95 in 2003 to incorporate findings of the British Standard BS 8300³, in particular the need to include details such as the provision of a safe area behind a parked car to enable easier access to a wheelchair stored in the back of a vehicle. However, BS 8300 did not review the basis of the standards for provision of car parking in terms of number of spaces for disabled people.
- 3.11. **Department for Transport's Guidance on Inclusive Mobility (2002)**¹²: The DfT's Guidance on Inclusive Mobility (2002) states that Blue Badge parking in local authority operated off-street car parks and in car parks offered for public use by private companies, should be provided as close as possible to the entrance of a facility. This should preferably be within 50 m with level or ramped access (preferred gradient 1 in 20) and under cover if possible. The Guidance also states that where the provision of designated parking spaces close to the building is not possible, a setting-down point for disabled passengers should be provided on firm and level ground, close to the principal entrance to the building.
- 3.12. The DfT's Guidance on Inclusive Mobility (2002) states that parking in multi-storey car parks the spaces should be on the level or levels at which there is pedestrian access or, if this is not possible, near to a lift usable by wheelchair users.
- 3.13. **ODPM - Part M 'Access to and Use of Buildings' (2004)**¹³: This document is one of a series that has been approved by the Secretary of State and provides detailed practical guidelines to fulfil the requirements of Schedule 1 to 7 of the Building Regulations 2000 for England and Wales (SI 2000/2531).
- 3.14. With regards to parking, the document does not provide guidance on the amount of Blue Badge spaces that should be provided; rather it provides technical guidelines with regards to the positioning and dimensions of the spaces.

- 3.15. **Disabled Persons Transport Advisory Committee (DPTAC) (April 2002)¹⁴:** In its review of the 'Disabled Persons Parking Scheme', DPTAC examined the purpose, eligibility, concessions and operation of the scheme among users, as well as the scheme's administration and enforcement. The report recommended that the provision of parking for Blue Badge holders should be enhanced by:
- “...requiring service to provide and manage off-street car parking to maintain accessible parking for Badge holders to the agreed standards contained within current National Planning Policy Guidance notes PPG13 and DTLR Traffic Advisory Leaflet 5/95 and the equivalent guidance in other parts of the UK”.
- 3.16. The report also mentioned that the introduction of local disabled persons parking schemes should be avoided because they add to confusion for Badge holders, especially to visitors who are unaware of the scheme's restrictions, about when and where they can park. In addition, DPTAC concluded that the credibility of the national Blue Badge scheme will be undermined by local permit schemes.
- 3.17. **Strategic Rail Authority - 'Train and Station Services for Disabled Passengers: A Code of Practice' (2002)¹⁵:** This document lays out the recommendations to enable access for disabled people to rail stations. The section on parking details the following: Parking bays for disabled people should be no more than 50m from the station entrance. Wherever possible, the pedestrian access should not intersect road traffic. The number of spaces depends on the size of the car park (see Table 3.2).
- 3.18. In addition, the Guidance recommends that operators must monitor usage, providing more spaces if they are full more than 10% of car park opening hours. It is also recommended that where designated spaces are in blocks, these should number no more than 10 to prevent abuse.

Table 3.2 SRA Guidelines for Number of Designated Parking Spaces

Size of Car Park	Number of Designated Bays
<20 spaces	Min. of 1
20-60	Min. of 2
61-200	6% of total, with min. of 3
Over 200	4% of total plus additional 4 spaces
500+	24 designated spaces

Source: SRA 'Train and Station Services for Disabled Passengers' (Technical note)

- 3.19. The document also specifies details for parking bays, tactile paving, dropped kerbs and drop off areas.
- 3.20. **Lifetime Homes Guidance²**: The Lifetime Homes standards were developed in the 1990s by the Joseph Rowntree Foundation Lifetime Homes Group. Lifetime Homes have 16 design features that ensure that homes are flexible enough to meet the needs of households throughout their lives.
- 3.21. The standards regarding parking have the following requirements:
- The width normally assumed for a car parking space is **2400mm**. If a parking space is next to the home, it should be enlargeable to a width of **3300mm** (such as by having the **900mm** path requirement specified in Part M);
 - Imaginative design can reduce the impact of this requirement on the space between houses;
 - The distance from the home to the parking space should ideally be kept to a minimum and be level e.g. between **15m** and **30m** maximum.
- 3.22. **Wheelchair Housing Design Guide, Second Edition (2006)¹⁶**: The second edition of the Wheelchair Housing Design Guide was published by Habinteg Housing Association in March 2006 and makes a number of recommendations to ensure ease of approach to the home by car and in relation to the design of car ports and garages. In high density developments where car parking spaces are grouped, it recommends that car parking is provided on the basis of management arrangements that provide at least one designated wheelchair accessible car parking space per wheelchair user dwelling. Wherever practical and feasible, parking should be undercover and travel distances should be minimised.
- 3.23. **Parking for Disabled Motorists: Position Paper 6 – Parking Forum (2004)⁴**: The current policy for increasing parking charges both on and off-street to encourage more sustainable forms of transport may encourage applications for and misuse of Blue Badges, since in the UK Blue Badge holders often enjoy free parking. The benefits Blue Badges provide mean that they are valuable commodities subject to theft, forgery and fraud. Abuse of Blue Badges also takes place; particularly it is reported, by family members. Parking attendants, under decriminalised parking enforcement regulations, do not have the power to inspect the name on the reverse of the badge, giving details of to whom the badge has been issued. Because abuse of the scheme is a criminal offence, enforcement is very difficult as it requires a police officer to be involved. Recent proposals to allow parking attendants to examine Blue Badges may help, though they will not solve the problem. Further anti-fraud measures may need to be introduced.

- 3.24. **Scottish Executive's National Planning Policy Guideline NPPG17 Addendum: Draft Transport and Planning Maximum Parking Standards (2002)**¹⁷: Within this policy guidance, the reference to parking for disabled people is as follows:

“Councils should continue to make specific provision for disabled parking. The amount, location and design of this provision should be discussed with local disability groups”.

- 3.25. **Mayor's Transport Strategy (2001)**¹⁸: The Mayor acknowledges the needs of disabled people in the city and makes recommendations to:

- Improve the street environment, by removing barriers and obstructions;
- Provide surface level pedestrian crossings with tactile paving and signals; and
- Prioritise parking for disabled people.

- 3.26. The strategy highlights the need for parking for disabled people to be provided close to key destinations, including shops, places of work, social, leisure and entertainment facilities, and stations. It goes on to recommend that developers use the DfT's Traffic Advice Leaflet 5/95 for further information in terms of numbers and design of parking spaces.

- 3.27. To prioritise access for disabled people, Blue Badge holders are exempt (with registration if necessary) from the congestion charge. However to be of full benefit, the Blue Badge parking concession scheme needs to be effectively operated and enforced. The strategy includes a proposal for TfL and the London boroughs to work with disability groups and the Government to “ensure the effective operation and enforcement of a reputable Blue Badge scheme” (Proposal 40.14). The need to review the separate Blue Badge Central London parking schemes is also highlighted within the strategy.

- 3.28. **London Plan (2004)**¹: In the London Plan, policy 4B.5 highlights the need to create an inclusive environment and that all future developments must “meet the highest standards of accessibility and inclusion”, so that:

- Developments can be used safely and easily by as many people as possible without undue effort, separation or special treatment;
- All people are offered the freedom to choose and the ability to participate equally in the developments' mainstream activities; and
- Developments support diversity and difference.

- 3.29. The London Plan highlights the need to regulate parking to encourage alternative travel modes and reduce unnecessary car travel. However it also stresses the

essential standards of access and inclusion (see paragraph 3.21) and acknowledges that some disabled people find private cars indispensable.

3.30. Policy 3C.22 emphasises that boroughs need to:

- Recognise the needs of disabled people and provide adequate parking for them;
- Encourage good standards of car parking design.

3.31. This means that even if a development has no general parking, there should be at least one accessible parking bay for disabled people. The London Plan's parking standards, as outlined in Annex 4 are as follows:

“Boroughs should take a flexible approach, but developments should have at least one accessible car parking bay designated for use by disabled people, even if no general parking is provided. All developments with associated car parking should have at least two parking bays for use by disabled people. The appropriate number of bays will depend on the size and nature of the development and boroughs should take into account local issues and estimates of local demand in setting appropriate standards. Where no off-street parking is proposed, applicants must demonstrate where disabled drivers can park in order to easily use the development”.

3.32. **SPG - ‘Accessible London: Achieving an Inclusive Environment’ (2004)¹⁹:**

The aim of this SPG is to provide additional guidance to the London Plan, specifically on how to promote better inclusion in London. It should aid boroughs when reviewing their Local Development Frameworks and when assessing planning applications.

3.33. The SPG Implementation Point 27, Parking Design, advises that:

- The design of the parking bays in residential developments should follow the Lifetime Homes standards. This means that the space should be capable of being enlarged to 3.6m and there should be a minimal distance from the space to the home which should be either level or gently sloping; and
- Car free developments should provide easily accessible parking, either on site or on street and keep disabled people in mind in their overall design.

4 Stakeholder Consultation Seminar

- 4.1. A seminar was organised in order to present the findings of the literature review and to discuss the emerging issues from the research. It also provided an opportunity to invite detailed comments from the participants.
- 4.2. Invitations were sent to disabled people, members of the local access groups and the London Access Forum, organisations of and who represent disabled people and access officers within London boroughs. A total of 26 people attended the seminar (including 5 members of the research team).
- 4.3. For monitoring purposes, each participant was asked to complete a survey, 11 of which were returned. The results of the survey showed that 8 people considered themselves to be a disabled person. When asked about the biggest barriers they experience, the top three reported were:
 - 'Physical access to buildings, streets, and transport vehicles';
 - 'People's attitudes to you because of your disability'; and
 - 'Stressful situations'.
- 4.4. A presentation was given to the seminar delegates outlining the progress of the research and the initial results of the literature review. Delegates were then invited to participate in an open discussion regarding a number of questions that were raised during the research. The open discussion focused on the following questions:
 - How can the increasing demand for Blue Badge parking facilities be satisfied in a changing society?
 - Is off-street parking at venues (shops, hospitals, residential housing, colleges etc) in London a significant problem?
 - If so, is this because not enough is available, it is not enforced properly, or because of the way it is provided (size, location etc)?
 - When there is a problem, does the availability of on-street parking (including yellow lines or red routes where allowed) help at all?
 - Are there any examples of good (and bad) practice car parks in London?

These can then be grouped into the research's three core themes:

- Demand and Supply of Blue Badge Spaces;
- Accessibility of Blue Badge Spaces; and
- Monitoring and Enforcement.

Demand and Supply of Blue Badge Spaces

- 4.5. The first question to be raised during the open discussion was about the allocation of Blue Badge parking bays and whether they are provided on an arbitrary basis. The Chair responded by explaining that the percentage figures in the Department of Transport (DfT) Traffic Advisory Leaflet 5/95 were based on the 1991 Institution of Highways and Transportation Guidelines called 'Reducing Mobility Handicaps' that would have been based on research carried out in the 1980's. During the discussion, the TfL representatives acknowledged that there may be a need to revisit these figures in the context of today's increased population, and in particular, in relation to the current and projected numbers of Blue Badge holders.

Accessibility

- 4.6. The need for parking to be as close to the destination as possible was raised as an issue, particularly in areas where there is controlled parking zones and/or pedestrianised streets. The seminar participants provided examples of where the access approaches to a development have not been considered, thus resulting in disabled people finding it very difficult to make their way from the local bus stop, taxi rank, car park, etc. across to the entrance of the building.
- 4.7. It was also recognised that the provision of on-street parking is not always a good substitute for off-street parking in inner London, particularly when bays are integrated within bus lanes or red routes.
- 4.8. The seminar participants discussed the current guidelines on the size of parking bays. It was raised that some Blue Badge holders can use the narrower, standard bay and these could be used in addition to the allocated percentage of wider Blue Badge bays. However, some participants mentioned that they often require even wider (as they enter the vehicle from the side) or longer bays (as some disabled people enter their vehicle from the back) than the recommended British Standard. Some participants mentioned that they tend to occupy two bays to ensure that they have enough room to manoeuvre, however this action can lead to being fined for occupying two spaces.
- 4.9. Participants also mentioned that car parks need to be carefully designed to accommodate parking bays and ensure there is enough space available for the disabled person to access the vehicle. The location of columns can often act as a barrier to accessing Blue Badge bays.
- 4.10. The issue of setting down outside buildings was also raised. Participants mentioned that there is no standard traffic sign for setting down for disabled people even though there are signs for other road users (e.g signs for deliveries).

- 4.11. It was also mentioned that it would be useful to have clear signage at the entrance of car parks, including information about the availability of Blue Badge parking bays, how many and whether they are occupied or not. Improved traffic signs e.g. Vehicle Messaging Signs (VMS) and Information Technology Systems (ITS) (e.g. real time information) indicating how many Blue Badge spaces are free within a car park would also be very useful.

Varying Borough Rules

- 4.12. Participants at the seminar mentioned the varying Borough rules with regard to the Blue Badge scheme and that the four central Boroughs each have their own individual schemes. They also mentioned that this causes problems not just for London residents but also for visitors to London, who not only don't know the rules but also do not know where the parking bays are.

Links to accessible transport

- 4.13. During the seminar it was recognised that the issue of off-street parking for Blue Badge holders is linked to other policies in the London Plan – in particular the use of public transport. Whilst the London Plan promotes the use of public transport for all, it does also recognise that some disabled people cannot use public transport on some occasions and that for some the car is the only option. The importance of the London Plan continuing to address individual needs was stressed, with awareness being the key.

Monitoring the use of Blue Badge bays and enforcement.

- 4.14. The seminar participants recognised that Blue Badge misuse increases parking demand and that tackling misuse through enforcement would increase existing/future capacity of Blue Badge parking. Several types of misuse were identified by the seminar participants including: i) bays being used by non badge holders; ii) badges being used by non disabled people; and iii) bays being used by a disabled person staying in the vehicle whilst parked waiting for the driver / passenger to return.
- 4.15. The seminar participants also noted that problems of misuse are often exacerbated when the bays are located in certain positions e.g. next to an ATM, an issue not considered by businesses. Some car park owners have begun to address the level of disabled parking space misuse within their car parks. One participant mentioned Sainsbury's car park in Camden as an example of where an initiative has been introduced to tackle bay abuse within its car park. The supermarket uses the services of parking attendants from the Euro Car Parks Company to patrol their car park and issue £100 parking fines to any vehicle abusing a parking space reserved for Blue Badge holders. The participant mentioned that this action has resulted in a reduction in the number of bay abuses.

- 4.16. The seminar participants suggested that stringent fines for bay abuse and misuse need to be introduced as a means of deterrent. The revenue raised could then be re-invested into the provision of accessible transport schemes and facilities.

Examples of Good and Bad Practice Car Parks

- 4.17. Seminar participants were asked to provide examples of good and bad practice car parks and their reasons for recommending the car park. The quotations below illustrate the examples that were provided:

“Hayward Gallery, South Bank - It is largely empty in the week and has taxi facilities within 50 yards”.

Blue Badge Holder

“Tesco car park in Hayes – it is policed by a member of staff and where necessary, tickets issued”.

Blue Badge Holder

“Asda store at Crossharbour in Tower Hamlets includes vehicle-activated sensors at its designated Blue Badge parking bays. Vehicles parking there are greeted by a pre-taped or digitised audible message”.

Access Officer

“ASDA are looking to bring in a new system where you can register up to 2 cars and there is a barrier system. They are trialling it in Southampton / Sheffield / Bracknell. You can also register if you are on holiday. They estimate it will take 10 years to roll the scheme out to all their stores nationwide – they will bring it in as they renovate their stores”.

Blue Badge Holder

“Canada Place in Canary Wharf is a good example because it is easy to access and secure”.

Access Officer

Summary

- 4.18. The following issues were raised by the seminar participants:

- Parking standards should be seen as part of an overall package to increase the accessibility of parking bays for Blue Badge holders within London.

- Parking standards should be used in conjunction with other transport and spatial integration mechanisms, including location policies, travel plans, access statements and the availability of other accessible transport alternatives (e.g. shopmobility, dial-a-ride and taxi card schemes).
- Access approaches to new developments need to be considered and parking needs to be as close to the destination as possible, particularly in areas where there is controlled parking zones and/or pedestrianised streets.
- The provision of on-street parking is not always a good substitute for off-street parking.
- The British Standard recommended parking bay size is not sufficient for some Blue Badge holders who need to use wider and or longer bays.
- Some car parks display signs highlighting how many free spaces are available within them; however, the signs do not show how many spaces are free for disabled people.
- Tackling Blue Badge misuse through enforcement increases existing capacity of Blue Badge spaces and deters people from abusing the scheme.

5 Desk Top Research and Case Studies

5.1. Following the seminar discussion, the project team carried out some research to explore the issues that were raised by the participants in more detail, including:

- Demand and supply of spaces;
- Accessibility of spaces; and
- Monitoring and Enforcement of spaces.

Demand and Supply of Spaces

National Database of Blue Badge Holders

5.2. The DfT is currently exploring the possibility of establishing a UK national database of Blue Badge holders. MVA Consultants have been commissioned by the DfT to assess the feasibility of establishing such a database. The project has consisted of i) a desk review of existing research, ii) a survey of local authorities' views on the feasibility of establishing a national database of Blue Badge holders (questionnaire and workshop session), iii) a review of suitable technology, including potential suppliers, products, and organisations capable of running such a system and iv) a final report summarising the above. The contract is in response to DPTAC's recommendations to the DfT and was completed in May 2006.

Minimum or maximum standards or neither?

5.3. The London Plan's Parking Strategy Policy 3C.22 states that UDP policies and transport Local Implementation Plans should 'reduce the amount of existing, private, non-residential parking, as opportunities arise'. Paragraph 3.206 states that the current policy of restraining parking provision should increase in many areas as the availability of alternative means of travel increases, and in the most accessible locations this should extend to car-free developments. Annex 4 of the London Plan sets out maximum car parking standards for employment, residential and retail uses and provides guidance on parking in leisure and mixed-use developments, and on the provision of parking for disabled people.

5.4. The Public Transport Accessibility Level (PTAL) methodology is increasingly being used by transport planners to assess the accessibility of a proposed development and identify the appropriate level of car parking spaces. The results are then included within transport assessments. The PTAL methodology does not take account of inaccessible underground or rail stations or other barriers to movement. As a result, there is a need to consider accessibility for disabled people within the context of the Social Model of Disability as part of transport assessments.

5.5. Similarly, the trip generation and car parking databases that transport planners use in their transport assessments do not have a consistent approach towards the inclusion of Blue Badge spaces. For example, TRICS (Trip Rate Information

Computer System) and TRAVL (Trip Rate Assessment Valid for London) are multi modal trip generation databases, which are used by transport planners to estimate the effects of proposed changes in land use on transport patterns and on the amount of road traffic generated by the area.

- 5.6. Using site specific information, such as development size, public transport accessibility and parking availability, TRICS and TRAVL can be used to predict the number of trips to and from a planned development by various modes of transport (e.g. car, train, bus, cycle, walking).

Availability of parking spaces at different land use developments

- 5.7. The project team carried out a review of TRICS and TRAVL databases to explore the survey results of car parking availability at different land use developments within Greater London since January 2000. The aim of the review was to illustrate the ratio of Blue Badge bays in relation to standard car parking spaces (see Table 5.1) at existing sites. The sites included within the table are those whose survey results specifically make reference to the (un)availability of Blue Badge bays.
- 5.8. During the review, the project team found that both TRICS and TRAVL databases are not consistent in their approaches towards the inclusion of Blue Badge parking spaces within their survey analysis. In some cases a total number of car parking spaces is provided but this number is not sub-divided into i) Blue Badge bays; ii) parent and toddler bays; or iii) allocated spaces for car sharers.
- 5.9. The results of the review highlight examples of where some sites do not allocate any Blue Badge bays even though car parking spaces are available (e.g. ALG and Highbury House Communications). In general, the table shows that an average of 2.6% of total car parking spaces is allocated as Blue Badge bays.

Table 5.1 Availability of parking spaces for disabled people at different land use developments

Review of the availability of parking spaces for disabled people at different land use developments							
Land use	Site	Address	Survey Date (TRAVL)	Total Employed	Gross Floor Area (GFA) / Retail Floor Area (RFA) (100 sqm)	Total Parking Spaces	Spaces for Blue Badge parking
Office	Hounslow Civic Centre	Lampton Rd, Hounslow	31.11.04	2,000	24,120 (gfa)	647	22 (3.4%)
	Baltic Exchange	St Mary Axe, City of London	08.02.05	150	3,809 (gfa)	0	0 (0%)
	ALG	Southwark St, Southwark	02.12.04	100	3,066 (gfa)	2	0 (0%)
	Highbury House Communications	Highbury Station Rd, Islington	24.04.01	160	1000 (gfa)	4	0 (0%)
Supermarket	Morrisons	Chingford Waltham Forest	20.02.02	400	6,500 (gfa); 3,437 (rfa)	520	20 (3.85%)
	Safeway	Chalk Farm Rd Camden	24.11.01	375	4,180 (gfa); 2,787 (rfa)	500	12 (2.4%)
	Asda Superstore	Leyton Waltham Forest	26.01.02	360	8,100 (gfa); 4,645 (rfa)	950	18 (1.9%)
	Beckton Retail Park	Alpine Way, Newham	21.03.03	291	16,370 (gfa); 12,882 (rfa)	619	35 (5.65%)
Retail Park	Bugsby Way	Bugsby Way, Greenwich	25.02.05	806	25,434 (gfa); 16,604 (rfa)	1150	50 (4.35%)
	Purley Way	Purley Way, Croydon	07.05.05	86	10,483 (gfa); 6,067 (rfa)	500	10 (2%)
Hospital	Whipps Cross Hospital	Whipps Cross Waltham Forest	13.06.01	4,027	86,353 (gfa); 743 bedrooms	1107 (staff + visitors)	50 (5%)
Leisure	LeisureWest	Air Park Way, Hounslow	16.06.01	327	13,110 (gfa)	800	25 (3.1%)

Source: Table compiled by JMP using TRICs and Travel Data.

Accessibility

Height Restrictions

- 5.10. The Institution of Structural Engineers (2002)²⁰ recommended that the minimum clear height or headroom for vehicles in multi-storey or underground car parks should be 2.10m. British Standard BS 8300 (2001)³ recommends that any vehicle height barrier should provide clearance of 2.6m from the carriageway to allow the passage of a high-top conversion vehicle. The vertical clearance should be maintained from the entrance to the car park to the designated parking spaces and to the exit. Some disabled motorists use vans or high-top cars, others use cars with their wheelchair stowed on top of the vehicle, so height can be critical.
- 5.11. It is therefore essential that the maximum acceptable height of a vehicle is shown on the approach to the car park so that the driver has time to avoid entering the car park and avoid being locked in a queue from which they cannot escape.

Transport Assessments

- 5.12. Currently, transport assessments and access statements are submitted as part of a planning application for all major developments and substantial schemes. These two separate documents tend to focus on different aspects of a planning application. As such, the transport assessment is reviewed by the transport planning and highways departments whereas the access statement will be reviewed by the borough's access officer. These two documents need to be integrated and cross referenced where appropriate to ensure that spaces for disabled people are assessed in terms of supply and accessibility. TfL issued guidance on Transport Assessments in May 2006²² and CABE issued guidance on access statements in June 2006²³.
- 5.13. To ensure that the needs of disabled people are taken into account the transport assessment needs to make reference to the following issues which will need to be addressed in full within the access statement:
- The philosophy and approach to inclusive design.
 - A list of the sources of advice and technical guidance used.
 - How inclusion will be maintained and managed.
 - A local area audit that assesses the accessibility of the area based on the needs of disabled people;
 - Details of any consultation planned and undertaken, i.e. the Access Officer and/or local disability group.
 - Details of any professional advice – such as access audits or design appraisals.
 - The availability of Blue Badge parking provision in on and off-street car parks within close proximity of the proposed development.

Access Statements

- 5.14. Guidance laid out in “Planning and Access for Disabled People: A Good Practice Guide” issued by the Office of the Deputy Prime Minister in March 2003²¹ states that their purpose is to outline how a project has been designed to deliver an ‘inclusive and accessible environment’. An “inclusive environment”, recognises and accommodates these differences in a way that is universal. An “accessible environment”, on the other hand, can be used by disabled people but is not inclusive in nature. Under the Social Model of Disability, inclusive is the preferred design option.

An access statement should be treated as more than just a commitment to meet the minimum standards of Part M of the Building Regulations¹³. It should clearly show how all potential users, regardless of disability or age, can enter the site and building/s, and use the facilities, including parking. As part of the access statement, scheme applicants are also advised to consider the implications of the Disability Discrimination Act 1995 (DDA) to ensure that the scheme’s proposals and their management are in the spirit of the Act and mitigate against any challenges. DCLG Circular 01/2006 Guidance on Changes to the Development Control System states that: “The design and access statement should also explain the policy adopted in relation to access and how relevant policies in local development documents have been taken into account. The statement should also provide information on any consultation undertaken in relation to issues of access and how the outcome of this consultation has informed the development proposals. This should include, for example, a brief explanation of the applicant’s policy and approach to access, with particular reference to the inclusion of disabled people, and a description of how the sources of advice on design and accessibility and technical issues will be, or have been followed. “

- 5.15. An access statement needs to include the following:

- The philosophy and approach to inclusive design.
- A list of the sources of advice and technical guidance used.
- How inclusion will be maintained and managed.
- Details of any consultation planned and undertaken, i.e. the Transport Planner / Highways Engineer / Access Officer or local disability group.
- Details of any professional advice – such as access audits or design appraisals.
- The level of accessibility within the local area- this should be supported with evidence of a local area audit that assesses the accessibility of the area based on the needs of disabled people;

- An explanation of specific issues which deviate from recognised sources of good practice, and how it is planned to overcome them.
- The availability of Blue Badge parking provision in on and off-street car parks within close proximity of the proposed development and an estimate of the future stability of this provision with evidence.
- Where good practice is not met, the access statement should say why and detail the implications for users.
- Details of all management and maintenance practice necessary to ensure the accessibility of the building/space.

5.16. An example of a borough's guidance for producing an access statement can be seen in Table 5.2.

Table 5.2 Example of a Borough's Access Statement Guidance

Corporation of London Access Statement Guidance

The exact form of the access statement will depend upon the size, complexity and nature of the scheme. For example: alterations to a shop front may include a brief description indicating how the issue of access has been taken into account given the opportunities and constraints of the site which will be backed up by a plan showing door dimensions, threshold details etc. On a major scheme such as a large office, retail or leisure facility substantial details will be required that demonstrate how the following issues have been or will be addressed in an inclusive manner:

- Approaches to and around the site;
- Car parking, setting down points and garaging;
- Entering the building(s) or development;
- General circulation and layout arrangements;
- Appropriate use of surfacing materials;
- Facilities including toilet provision within the building;
- Wayfinding and signage;
- Lighting levels and colour/tonal contrasts;
- Evacuation; and
- Any other relevant matters specified.

- 5.17. An example of an access statement submitted by a developer for a non-food retail outlet, which specifically mentions the provision of spaces for disabled people can be seen in Table 5.3.

Table 5.3 Example of an Access Statement which includes car parking

<p style="text-align: center;">Kingston Homebase Access Statement</p> <p>This access statement was prepared on behalf of Homebase Ltd for a proposed new building in New Malden, Kingston. Key access considerations relate to:</p> <ul style="list-style-type: none">▪ The provision of adequate disabled car parking provision and transport links with the surrounding area;▪ Approaches to and around the site;▪ The entering and exit of the building;▪ Circulation routes around the site;▪ Provision of adequate facilities within the development; and▪ The provision of clear and legible signage to assist way finding and potential evacuation. <p>The scheme was designed with links to other infrastructure and services as one of its main considerations thereby ensuring that it ensures connectivity between the local centre and bus network. The development provides a total of 156 car parking places, 9 (6%) of which are dedicated to disabled car parking (5 for wheelchair users and 4 for ambulant disabled) and these are located as close to the store entrance as possible.</p> <p>The parking bays for use by mobility or visually impaired people who can walk will be 2.8m wide allowing the extra space required for manoeuvring that people with limited mobility require.</p> <p>The parking bays for use by wheelchair users will be 3.6m wide, to allow for wheelchairs to transfer sideways from the car seat to the wheelchair. The 1200mm space for side transfers will be cross hatched to help ensure it is left unobstructed. A rear transfer area of 1200mm will also be marked out between the car parking bays and the vehicular route.</p> <p>The surface of the designated car parking bays will be level, stable, durable and slip resistant. A setting down point has been provided directly in front of the store entrance, adjacent to the disabled car parking spaces.</p>

Travel Plans

- 5.18. Guidance for Travel Plans does not specifically include a requirement for the plan to incorporate the provision of Blue Badge spaces, although we would urge that such advice should be included. Guidance on putting together Travel Plans should also contain guidelines for Blue Badge off-street parking provision, or evidence of attempts to secure on-street provision.
- 5.19. Table 5.4 illustrates an example of a Travel Plan's attempts to promote accessibility for disabled people within a proposed development.

Table 5.4 Example of a Travel Plan

Stratford Travel Plan
Access The Developer will have regard to the transport needs of disabled people in the preparation and operation of the Travel Plan. Bus stops within the Development will be designed to cater for low-floor vehicles and step-free access. The Developer will not occupy more than 80% of the retail floorspace in Zone 1 Completed as at the Opening Date unless it has established and made available to the public a Shopmobility service within the Town Centre Extension. The Developer will not open any retail or leisure floorspace in Zone 1 (except at Angel Lane) for trade with the public unless it has paid to the Council the sum of £100,000 which will be applied by the Council as a contribution towards the purchase and operation of an additional vehicle for TfL's Dial-a-Ride fleet operating from Woodford (or any other location in the vicinity of the Site) and serving the Development and its hinterland.

Shopmobility

- 5.20. DfT's Guidance on Inclusive Mobility (2002)¹²: states that where car parks serve a general area rather than a specific facility, consideration should be given to providing a Shopmobility service for disabled motorists between the car park and the area served by it. This type of service, of which there are many examples, can also be helpful for older and disabled people who travel to a town centre by Dial-a-Ride or similar accessible bus services. A good location for a Shopmobility scheme

office would be in close proximity to a large car park and set down/pick up points for local Dial-a-Ride, Community Transport bus services and local public transport.

- 5.21. A review of the parking facilities at Shopmobility centres within London was undertaken and the results can be seen in Table 5.5. As illustrated within the table, all the centres do have parking provision for Blue Badge holders, however, it is not clear whether this provision is on or off-street.

Table 5.5 Availability of Blue Badge parking at Shopmobility facilities

Borough	Parking within 40m	Parking for BB
Barking & Dagenham (Ripple Road)	✓	✓
Brent Cross (Brent Cross Shopping Centre)	✓	✓
Camden (Pratt Street)	✓	✓
Harrow (St George's Centre)	✓	✓
Hounslow (Treaty centre car park)	✓	✓
Ilford (Redbridge) (The Exchange Mall)	✓	✓
Lewisham (Molesworth Street)	✓	✓
Hillingdon (Uxbridge) (The Chimes Shopping Centre)	✓	✓
Waltham Forest (Selborne Walk Shopping Centre)	✓	✓
Wandsworth (Garratt Lane)	✓	✓
Wood Green (Library Shopping Mall)	✓	✓
Sutton (St Nicholas Centre Car Park)	✓	✓
Croydon (Whitgift Car Park)	✓	✓
Kingston (Union Street)	✓	✓
Merton (Riverside Business Centre, Garratt Lane)	✓	✓

Source: Data compiled by JMP

Monitoring and Enforcement

- 5.22. The Dft's Guidance on Inclusive Mobility (2002) states that spaces reserved for use by disabled motorists should be monitored for abuse, with reminder notices or other appropriate action taken if cars are wrongly parked.
- 5.23. The London Boroughs are increasingly introducing charges for both on and off-street parking. The Parking Forum (2004)⁴ predict that this practice will probably encourage applications for and misuse of Blue Badges as badge holders tend to enjoy free parking or concessionary savings on parking fees. The paper also stressed that the Road Traffic Acts do allow local authorities to implement specific controls for off-street parking places for disabled people and the use of such traffic orders covering these spaces may be a solution to the increasing misuse of these bays. Currently they are not used to any great extent.
- 5.24. Some boroughs have begun to introduce their own permit schemes as a means of combating the theft of Blue Badges (see Table 5.6).

Table 5.6 Tower Hamlet's approach to preventing the theft of Blue Badges

Tower Hamlet's Substitute Disabled Badge Permit Scheme
<p>This is a scheme designed to combat the theft of Blue Badges. In addition to their Blue Badge, residents can apply for a substitute parking permit which is only valid in the car they use most often. When parking outside the boundaries of the borough they can use their Blue Badges, however, when parking within the borough they can use their substitute permit and clock, which are worthless to thieves. The vehicle registration number is printed on the front of the permit and the driver's details are stored on a barcode that is checked by traffic wardens, using hand held devices, and the police.</p> <p>This scheme has led to a considerable reduction in car crime and the theft of badges down by 20% (March 2005) but car crime in neighbouring boroughs went up as a result.</p>

- 5.25. Steps are also being taken to deter drivers from blocking parking bays designated for use by disabled people (see Table 5.7).

Table 5.7 Example of a borough's attempt to deter bay blockers

Newham cracks down on disabled parking bay blockers

Newham Council takes disabled bay blocking seriously. A hotline is available for the public to report disabled bay infringements and this heads the Council's criteria for vehicle removal.

- 5.26. Some Boroughs have used parking fines as a funding mechanism to provide more accessible transport. (See Table 5.8).

Table 5.8 Using a parking fine surplus to provide more accessible transport

Camden's parking fine surplus is re-invested in accessible transport

Camden makes a surplus on its parking and enforcement account, which is then used to facilitate a number of other schemes designed to promote social inclusion and choice and equality of access for disabled people, including:

- Concessionary fares for elderly and disabled people;
- The London Taxicard Scheme for disabled people;
- Public transport support measures including making public transport more accessible;
- Support for Community Transport services for elderly, disabled and other people who experience difficulty using public transport;
- PlusBus InterActive to create one-stop-shop and integrate multi-operator door-to-door bus services;
- Making the street environment safe and free of barriers particularly for disabled and frail people including tactile paving and dropped kerbs at recognised crossing points.

- 5.27. DPTAC (2002)¹⁴ recommended that legislation be introduced to enable badges to be checked by police officers, traffic wardens and parking attendants as this is the foundation for the successful operation of the scheme.

- 5.28. It is hoped that the DfT's national database of Blue Badge holders (if developed) will assist in parking enforcement, particularly when linked to advances in technology e.g. facilities to read badges and camera surveillance.
- 5.29. Information about how many badges have been issued is maintained by the social services department within each of the London boroughs. This information is not centrally co-ordinated by the ALG, GLA or TfL. To better understand how many badges have been issued by the individual boroughs, this would involve ringing each of them and this information is not easily available. For example, the project team were asked to submit a Freedom of Information request to obtain the number of Blue Badge holders living in Newham.

Case Study Policy Review

- 5.30. Following discussions with the project Steering Group the following inner and outer London boroughs were selected as case studies:
- Camden: an inner London borough that does not fully recognise the Blue Badge scheme due to general parking constraints;
 - Newham: an outer London borough that is experiencing a great deal of growth as a result of the forthcoming Olympics and development of Stratford City, and
 - Royal Borough of Kingston-upon-Thames: an outer London borough with a town centre undergoing a period of regeneration.
- 5.31. A review of the individual borough's Local Implementation Plans (LIP) and Unitary Development Plans (UDP) was undertaken as part of a benchmarking exercise to examine their policies on parking standards for disabled people.

Transport Hierarchy of Needs

- 5.32. Each LIP includes a 'Transport Hierarchy' to help each borough determine the development and delivery of parking facilities between different potential uses (e.g. the controlled parking zone programme and parking permit arrangements).
- 5.33. In Camden's LIP (2005)⁷, disabled drivers are at the top of the council's hierarchy of needs followed by: ii) residents; iii) carers; iv) loading and unloading of goods and provision of services; v) businesses with an essential need to use a vehicle; vi) shoppers; vii) visitors to residents and businesses; and viii) others with essential parking needs.
- 5.34. In Kingston's LIP (2005)²⁴, the borough's hierarchy is as follows: i) pedestrians including disabled people using electronically powered mobility vehicles; ii) cyclists; iii) public and community transport vehicles, Blue Badge vehicles; iv) freight vehicles and powered two wheelers (PTWs); and v) private cars.

- 5.35. In Newham's LIP (2005)²⁵: the hierarchy of street space differs according to each CPZ. This is based on the number of each type of bay in each zone. In 9 out of 10 CPZs, Blue Badge holders come last in the hierarchy.

Parking for Disabled People Policy

- 5.36. Each borough has a different approach to their policy on parking for disabled people.
- 5.37. Camden's UDP (2000)²⁶ recommends that:
- "...the standard bay size should be: 2.4m x 4.8m and disabled persons bay: 3.3m x 4.8m....The number of bays capable of use as disabled persons bays (that is, with dimensions 3.3m x 4.8m) should be: i) each bay, where 3 or fewer bays are provided and site constraints allow; and ii) a minimum of 3 bays and additional bays at a rate of 5% of the total number of operational spaces where more than 3 operational bays are provided".
- 5.38. Kingston's LIP (2005) recommends that developers refer to policy T13 which sets out the Council's requirement that parking provision for disabled people is expected to follow the advice in Traffic Advice Leaflet 5/95. It goes on to state that:
- "Disabled parking provision is prioritised on and off-street and the Council consults organisations representing disabled motorists to ensure that provision is made in the areas most helpful to them. A Blue Badge scheme operates and will be made more useful for legitimate users by a new Council role in inspecting Blue Badges to detect fraudulent use".
- 5.39. Newham's UDP (2001)²⁷ recommends that the Council's general approach to applying car parking standards will be one of minimising the number of spaces provided subject to there being no unacceptable effect on amenity and congestion.

Off-street parking

- 5.40. Each borough has a different approach to their policy on off-street parking.
- 5.41. Camden's LIP (2005)⁷ provides limited information about the provision of off-street car parking provision for disabled people. The report includes a table highlighting the main off-street car parks in Camden and their respective provision for disabled people, but readers are referred to Policy TR14 within the UDP for further information. However, this policy does not specifically mention the provision of parking spaces for disabled people. Policy TR17, 'Residential Parking Standards', includes the following reference:

“The Council will normally apply the parking standards to all new-build residential development or where there is a change from non-residential to residential use, so that: they are designed to accommodate the needs of people with disabilities”.

5.42. Camden’s UDP also mentions that the provision of public off-street and contract car parks should be managed to complement the Council’s traffic restraint policy. Accordingly it aims to restrict the supply of parking space at all new developments and has policies to encourage car-free and car-capped housing.

5.43. Kingston’s LIP (2005) mentions that the Council aims to provide suitable and adequate parking facilities both on and off-road, most importantly for disabled people (Blue Badge holders) and community transport vehicles. It goes on to state:

“For several years the Council has maintained a policy of providing disabled persons parking bays in its car parks and of exempting Blue Badge holders from charges. The advent of the DDA led to a review of the designated disabled parking provision in the Council’s multi-storey car parks. The aim of the review was to identify the number of bays that could practically be provided to accord more closely with the legislation and disabled people’s need to access employment and services without unduly compromising the availability of the general parking supply for non-disabled motorists”.

5.44. Based on the results of their review, the Borough introduced 44 new bays and re-sized 8 existing bays within its multi-storey car parks.

5.45. Newham’s LIP (2005) states that the “Council designates a minimum of 6% of spaces for use by (disabled) Blue Badge holders”. The cost of parking for Blue Badge holders is free of charge for a maximum period of 3 hours, except within the Stratford multi-storey car park. The LIP goes on to highlight that the Blue Badge bays are located within accessible and convenient locations.

New developments: parking standards for disabled people

5.46. Each borough has a different approach to parking standards for new developments.

5.47. In Camden, the LIP highlights the council’s plans to introduce new parking bays for disabled people outside key local amenities, including surgeries and libraries, in consultation with the Council’s Mobility Forum of disabled and older residents and carers. The LIP goes on to state “in car free housing schemes there is no car parking on the development site except for disabled drivers”.

5.48. In Kingston, the LIP (2005) states

“The parking standard to be applied to a development will depend on both the intended land use and the location of the site. Parking standards refer to the maximum number of spaces to be provided. The Council is concerned that, in isolation, the use of maximum car parking standards could have an adverse effect on the safety and amenity of areas adjoining the new development and on the operation of the road network in the vicinity. To that end, the Council will seek contributions in appropriate cases to its fund for transport improvements and will encourage all organisations to prepare travel plans”.

- 5.49. Disabled Persons parking bays will be provided wherever possible adjacent to libraries, day centres, hospitals and similar institutions where adequate on-site parking is not practicable and there is a high level of street parking in the area. The Council will also consider the needs of disabled residents who live in areas subject to parking congestion.
- 5.50. Newham’s LIP (2005) explains that the Borough applies maximum parking standards, in accordance with regional and national planning guidance, for new developments, as well as accepting zero parking provision for new developments anywhere in the borough. For example, it states:

“For residential development we operate absolute parking standards except in town centres within Controlled Parking Zones where we allow reduced or zero off-street parking provision where there is good access to public transport and to shops and services. The off-street residential car parking requirement is related to the PTAL (Public Transport Accessibility Level) of the development in question. Developments with reduced or zero off-street parking provision are known as ‘Car-free’ and the residents thereof (except Blue Badge holders who meet the criteria) are not eligible for on-street parking permits”.

Example of parking provision within the 3 boroughs’ off-street car parks

- 5.51. A review of existing off-street car parks within each of the three boroughs was undertaken to analyse how many Blue Badge spaces are allocated in the main off-street car parks (both council and privately operated) within the three case study boroughs (see Table 5.9). As highlighted in the table, apart from the Selsdon Road car park in Newham, less than 10% of spaces in car parks are provided for Blue Badge holders.

Table 5.9 Main off-street council and privately operated car parks

Camden		Kingston		Newham	
Euston Station	217 spaces 4 BB (2%)	Guildhall	61 spaces 4 BB (7%)	Selsdon Road	8 spaces 8 BB (100%)
Adeline Place	140 spaces 2 BB (1%)	Sainsbury's	421 spaces 23 BB (5%)	Grove Crescent	45 spaces 4 BB (9%)
Museum St	240 spaces 2 BB (1%)	Cattle Market	588 spaces 26 BB (4%)	St Johns Road West	28 spaces 2 BB (7%)
Parker St	330 spaces 2 BB (1%)	Seven Kings	703 spaces 34 BB (5%)	Settle point car park	68 spaces 4 BB (6%)
		Drapers MSCP	417 spaces 18 BB (4%)	Stratford MSCP	675 spaces 38 BB (6%)
		John Lewis	710 spaces 22 BB (3%)	St Johns Road East	108 spaces 6 BB (6%)
		The Bittoms	803 spaces 17 BB (2%)	Madge Gill Way	65 spaces 4 BB (6%)
		Bentall Centre	585 spaces 7 BB (1%)	Shaftesbury Road	150 spaces 0 BB (0%)
		Ashdown Road	186 spaces 0 BB (0%)	Queens Market	150 spaces 0 BB (0%)
		Canbury Place	108 spaces 0 BB (0%)		
		Thameside	32 spaces 0 BB (0%)		
		Neville House	30 spaces 0 BB (0%)		
		Caversham Road	10 spaces 0 BB (0%)		

Source: Borough's UDP and LIP documents, and borough websites.

Summary

The main issues resulting from the desk top study and case study research were:

- The guidance in key documents (London Plan, Transport Assessment, Access Statement, Management Plan and Travel Plan etc) needs to be synthesised to ensure that the guidelines on parking for disabled people are consistent.
- In future years' annual LIP Reporting & Funding Guidance, consideration should be given to adding wording that would encourage boroughs to update their surveys of on- and off- street parking provision for disabled people, and take the findings into account, when designing and consulting on LIP schemes that may provide opportunities for improved provision.
- When the Mayor's Transport strategy is revised, consideration should be given to strengthening advice to London boroughs to complete surveys of on- and off-street parking provision for disabled people on a regular basis, and to consider its adequacy against suitable standards.
- Boroughs should incorporate a reference to the provision for off-street parking for disabled people within their LIPs, including the level of provision, and how this relates to their provision of on-street parking.
- A survey of all off-street car parks needs to be carried out to a) identify their location, b) number of spaces, c) number of Blue Badge spaces, d) signage, e) bay location and positioning and f) the extent of any undersupply of parking facilities for Blue Badge holders that might exist.
- A revised map illustrating the location of Blue Badge bays, showing broad categories of accessibility (e.g. bays above the minimum standards) is required.
- In situations where disabled parking spaces are removed from the TLRN, TfL and the relevant borough should reinstate the space in a neighbouring street.
- Revenue raised from penalties should be ring fenced and spent on improving the provision of public transport and community transport schemes.

6 Fieldwork Surveys and Analysis

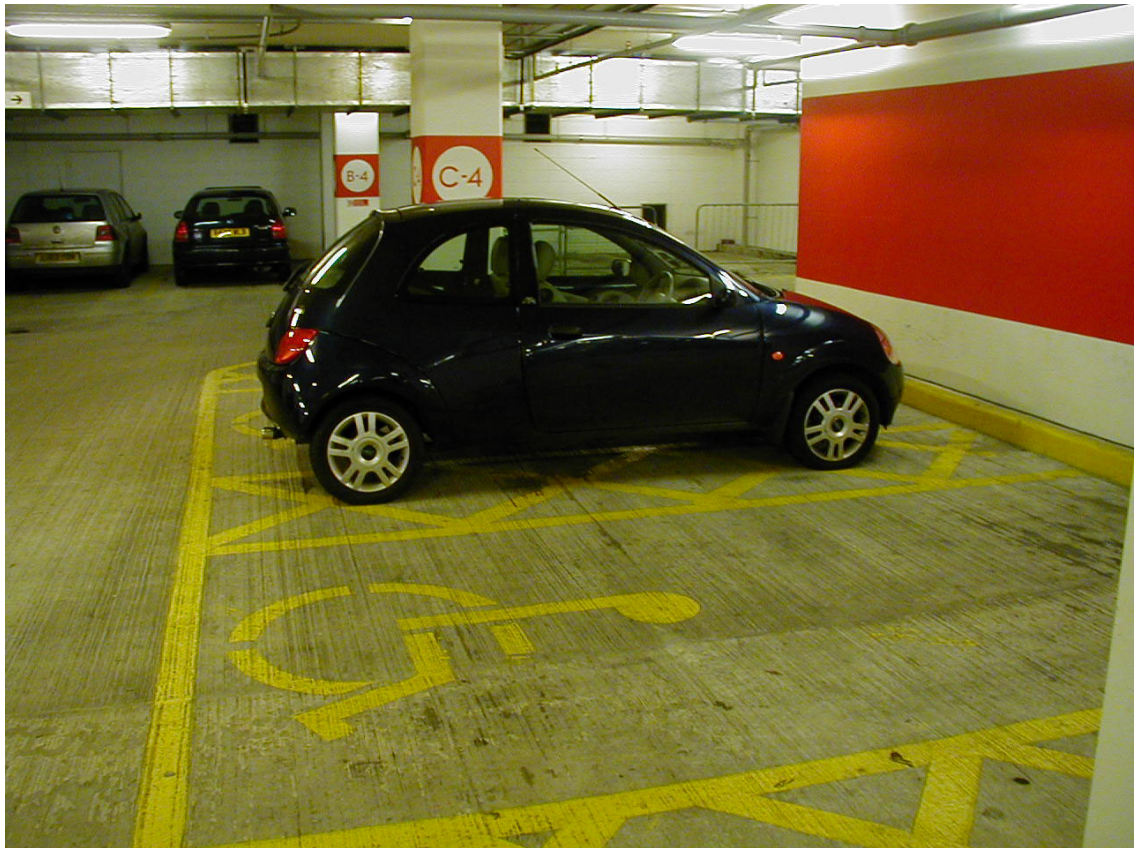
- 6.1. A survey of 5 car parks (1 in each of the case study boroughs and 2 car parks recommended by participants within the stakeholder seminar) was undertaken to find out what Blue Badge holders think about parking in London (see table 6.1). A copy of the survey questionnaire and the result tables can be found in Appendix B.
- 6.2. The car parks were selected based on the suggestions of the seminar participants and discussion with access officers and/or parking managers within each of the three boroughs.

Table 6.1 Surveyed Car Parks

	Type of car park	No. of spaces	No. of Blue Badge spaces
Canada Place – Tower Hamlets	Retail	900	21 (2%)
Stratford MSCP Newham	Multi storey car park	675	38 (6%)
Sainsbury’s Camden Rd	Retail	296	9 (3%)
Soho Westminster	Town centre	422	4 (1%)
Rotunda Kingston	Leisure	21	21 (100%)

- 6.3. The **Canada Place** car park was chosen as an example of good practice by the seminar participants because of the location of its bays (at the end of the circlet). The car park is located within the Canary Wharf complex. Information about how to access the car park is available online, including a map illustrating its location. Blue Badge holders are not exempt from parking charges, however concessions are available: the cost of parking for the first 2 hours is £1 (compared to the standard charge of £3.50. For those needing to park for a longer period (e.g. 6 hours) the cost rises to £17.

F 6.1 Canada Place Car Park.



- 6.4. **Stratford Multi-Storey Car Park** was selected after discussions with the local authority and because of its size, location and accessibility. The car park is situated above the main shopping complex within Stratford and Blue Badge bays are located next to the lifts. Concessions are not available to badge holders and the cost of parking is 50p for the first hour and this charge increases by 50p up to 4 hours when the fee is £2.50 and £5 for 6 hours.

F 6.2 Stratford Multi-Storey Car Park.



- 6.5. **Sainsbury's** car park on Camden Road was identified as an example of best practice due to active enforcement measures. Parking attendants from Euro car parks currently patrol the car park to ensure that disabled spaces are not occupied by non Blue Badge holders, and if there is evidence of abuse, £100 fines are issued. The car park is located in Camden Town and is clearly signposted. Concessions are not available to badge holders and the cost of parking is £2.50 per hour. However, customers can park freely if they spend more than £10 in the store.

F 6.3 Sainsbury's Car Park



- 6.6. The **Soho** car park in Westminster is part of the award winning 'Safer Car Park' scheme and is operated by MasterPark on behalf of Westminster City Council. The car park is located in central London and is monitored by CCTV and has trained attendants. Concessions are not available to badge holders and the cost of parking is £5.50 for the first hour, £9 up to 2 hours increasing to £25 for 6 hours.

F 6.4 Soho Car Park.



- 6.7. The **Rotunda** car park was selected after discussions with the borough's access officer. The car park is located next to the newly developed Rotunda leisure and entertainment complex and is designed specifically for Blue Badge holders only. However, the car park is more than 200m away from the entrance of the leisure complex and as such is rarely used by non-wheelchair badge holders. In addition, there is a lack of signs to the car park. Discussions are currently taking place between the access officer and the car park manager to try and find a solution to the problem of the distance between the car park and the entrance of the complex and the lack of signage. Badge holders can park freely within the car park.

F 6.5 Rotunda Car Park.



- 6.8. The surveys were carried out by interviewers to identify the experiences of Blue Badge holders in accessing disabled parking bays in London.
- 6.9. The survey questionnaire consisted of fourteen questions, including demographic questions, and took approximately 5 minutes to complete. The survey included the following questions:
- In which borough / local authority do you live?
 - Do you have a borough specific parking permit, in addition to your Blue Badge? (if so, where from?).
 - Do you drive your own car?
 - Do you drive from a wheelchair?
 - Do you need extra space to access your vehicle? And if yes, do you need space on the driver's side, on the passenger's side or at the back?
 - Where do you need to park in relation to your destination? As near as possible to the entrance, within 50 meters of the entrance, or can walk / wheel further if necessary?
 - Do you have any difficulties parking at venues (shops, hospitals, residential housing, college, leisure centres) in London? If yes, the reasons why....
 - Do you have any examples of good and bad practice car parks in London?
 - Overall, how satisfied are you with the number and location of bays in off-street car parks?
- 6.10. The surveyors were asked to record the number of non-badge holders parked in the disabled spaces within each car park. The results showed that there was at least 1 vehicle parked without displaying a Blue Badge within all 5 car parks. Evidence of bay abuse was more apparent in the Stratford MSCP (5 out of the 28 bays) and the Soho MasterPark car park (3 out of the 4 bays). In Kingston, 2 out of the 21 bays are currently blocked by a blue container-mounted generator.
- 6.11. A total of 62 people were surveyed across the five car parks:
- Canada Place car park: 7 respondents and 1 refusal.
 - Stratford MSCP: 19 respondents and 0 refusals.
 - Sainsbury's Camden: 34 respondents and 2 refusals.
 - Soho Master Park car park: 0 respondents and 0 refusals (this car park was not used by disabled people during the survey period).
 - Rotunda car park: 2 respondents and 0 refusals.
- 6.12. There was an even split between males and females and the largest group of respondents were aged between 46-65 (n=28) followed by 66+ (n=17); 26-45

(n=16) and 17-25 (n=1). Over two thirds of the respondents stated they were White British.

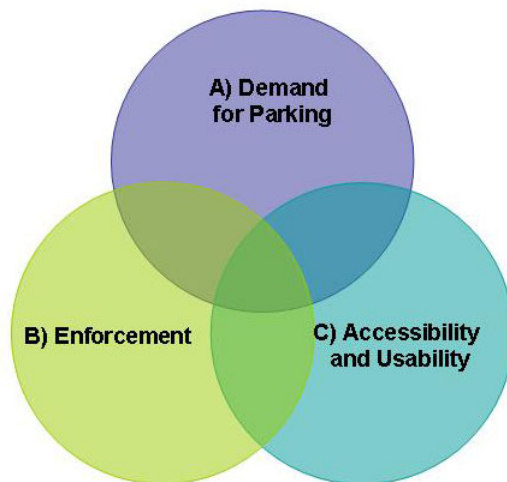
- 6.13. In relation to vehicles and driving, 6 respondents had a parking permit in addition to their Blue Badge (i.e. a permit issued by Camden, Westminster, Kensington & Chelsea or the City of London). Most respondents (n=53) said they drive their own vehicle, but no one mentioned driving from a wheelchair. When asked if they need any additional space to access their vehicle, 15 need this space on the driver's side; 9 said they need it on the passenger's side and 2 said both on the passenger's side and at the back of the vehicle.
- 6.14. The results of the question about where they need to park in relation to the destination showed that half of the respondents said 'as near as possible to the entrance', ten people said they need to park within 50m of the entrance and 17 said they can walk / wheel further if necessary. These results support the comments that were made in the seminar about parking distances as over two thirds of the respondents said they need to park within 50m of the entrance.
- 6.15. Most of the respondents (n=41) said they experience a difficulty when parking at venues. When asked what sort of venues they have most difficulty with, the main problem was outside of a hospital (n=30) and they quoted Newham General, Royal London, UCH and Homerton as being particularly problematic;
- 6.16. When asked the reasons why they experience difficulties in parking at these locations the responses included:
 - There are not enough spaces available (n=37);
 - The spaces are not accessible (n=28);
 - The spaces are occupied by non-Blue Badge vehicles (n=8).
- 6.17. Supermarket car parks, particularly Sainsbury's and Tesco car parks, were highlighted as being the 'best practice' examples of car parks due to the availability of spaces and the width of the bays.
- 6.18. Respondents were asked how satisfied they are with the number and location of bays in off-street car parks: 48 respondents said they were either fairly (n=32) or very satisfied (n=16), 2 were neither satisfied or dissatisfied and the remaining 12 were either fairly dissatisfied (n=8) or very dissatisfied (n=4). Less than 20% of the respondents said that they were dissatisfied with the number and location of bays in off-street car parks in London.
- 6.19. Due to the limited number of car parks that were surveyed and the small number of respondents, the results of this questionnaire must be treated with caution. These

results can only be used to illustrate some of the broader issues that were raised, including: where people need to park in relation to the entrance of a building; developments where they experience most parking problems and the nature of that problem.

7 Analysis and Conclusions

- 7.1. The policy and literature review revealed some interesting issues regarding Blue Badge parking. The current policies and studies highlight the needs of Blue Badge holders in general and in London, in particular. The literature review showed that the lack of Blue Badge spaces, the distances that need to be covered to reach them and their misuse by other drivers result in Blue Badge holders being left at a serious disadvantage.
- 7.2. To aid a summary, the issues arising from the research have been grouped into 3 key areas:
- The **demand** for Blue Badge parking spaces (e.g. the availability of enough accessible bays to meet the likely demand);
 - **Enforcement** (e.g. the need to prevent Blue Badge bay abuse); and
 - **Accessibility and usability** (e.g. ensuring that the bays are suitably designed and provided in accessible locations).
- 7.3. These three aspects are mutually dependent on each other if effective Blue Badge provision is to be achieved. Figure 7.1 show that it is a combination of these activities that results in satisfactory provision.

Figure 7.1 Aspects of Blue Badge Parking



- 7.4. This research overall has shown that an integrated approach is needed in borough's parking policies to assist planners in exercising their development control functions regarding the provision of disabled parking spaces. This means that in the context of the London Plan, boroughs should be provided with evidence-based advice about Blue Badge allocation, Blue Badge bay quotas, enforcement and accessibility. The link between on and off street parking provision should also be considered. This holistic approach is important as each area is interlinked and influences the other.

- 7.5. In addition, as the demand for Blue Badge parking is continuously changing, a rolling programme that monitors the current state of parking for disabled people in London is required. There is a need to balance the growing demand for Blue Badge provision with other parking demands such as population growth, policy restrictions and specific issues such as delivery vehicles in local centres. A longitudinal survey would determine the changes in under or over supply of parking facilities over time.
- 7.6. Careful consideration should be paid to the content of transport assessments and access statements. Both documents need to be cross-referenced to ensure that they complement and support each other, particularly as one is most likely to be used by a highways authority (transport assessment) and the other by a planning authority (access statement).
- 7.7. Transport assessments need to ensure that they are fully inclusive and incorporate the needs of disabled people whilst access statements should also include transport provision, parking and proposals to improve accessibility more generally.
- 7.8. The project team recommend that the following is taken into consideration:
- Within the framework of the Social Model of Disability, Boroughs should take a flexible approach to the provision of car parking spaces for disabled people.
 - Developers must demonstrate how their proposed development relates to the existing provision for on- and off-street parking for disabled people within the proposed area.
 - All developments should have at least one accessible on- or off-street car parking bay for disabled people, even if no general parking is provided.
 - For proposed developments with associated off-street car parking, the number of spaces for use by disabled people will depend on: the size, location and nature of the development; the existing supply of on- and off-street car parking; the accessibility of the local area (e.g. walking, cycling, public transport, DRT services and the availability of shopmobility); and estimates of local demand for parking bays.
 - Applicants should follow the Part M 'Access to and use of buildings' (ODPM, 2004) guidance for the positioning and dimensions of spaces. The location of spaces should be considered in relation to entry points to buildings, lifts, stair wells and other destination locations.
 - For proposed developments with only one car parking space, applicants must survey existing facilities to demonstrate where disabled drivers can park in order to easily use the development.
 - Boroughs will also need to develop a car parking space monitoring and enforcement strategy which includes actions that need to be taken to prevent the misuse of spaces.

8 Recommendations

- 8.1. This section of the report contains a list of recommendations for the London Plan based on the results of the research.

Table 8.1 General Recommendations

- | | |
|-----|--|
| GR1 | Emphasis needs to be placed on the Social Model of Disability, rather than the medical model when making parking provision. That is, developers should consider barriers to access to the development both at the time of development and, as far as possible, future barriers and make provision accordingly through the use of appropriate design techniques. |
| GR2 | Developers need to demonstrate how their planning application relates to the existing provision of on and off-street parking for disabled people within the proposed development area. |
| GR3 | Transport assessments and travel plans submitted as part of a planning application should address the needs of disabled people, through the provision of parking spaces for disabled people, by removing barriers to the use of public transport and providing funding towards accessible transport schemes (e.g. Shopmobility, Dial-a-Ride and Taxicard schemes). |
| GR4 | Transport assessments and access statements need to be integrated and cross referenced where appropriate. |
| GR5 | Access statements need to include guidance on parking for disabled people, both on and off-street. |
| GR6 | LIPs should be updated to include policy on the supply, access and enforcement of Blue Badge parking spaces. |
| GR7 | A survey of off and on-street car parking should be carried out. |

Table 8.2 Demand and Supply Recommendations

- | | |
|------|---|
| DSR1 | The provision of sufficient parking bays for disabled people needs to be reviewed on a regular basis to ensure that the level is adequate for the changing needs of the local area and its badge holders. |
| DSR2 | Boroughs should survey existing facilities to ensure there is sufficient parking for disabled people at key locations. |

Table 8.3 Accessibility Recommendations

- | | |
|-----|---|
| AR1 | In developing traffic management strategies such as controlled parking and pedestrianisation of town centres, local transport authorities must have regard to the impact these will have on the ability of badge holders to park. |
| AR2 | Where space allows, wide and long bays should be designed in excess of British Standard recommendations as bay sizes are not sufficient for all badge holders. |
| AR3 | It is also important to consider access from the parking bay to the developments. |
| AR4 | Developers and London Boroughs should be encouraged to sign the provision and availability of Blue Badge spaces. |

Table 8.4 Monitoring and Enforcement Recommendations

- | | |
|------|--|
| MER1 | Guidance on monitoring and enforcement of Blue Badges and parking in spaces designated for use by disabled people is required. Best practice examples should also be disseminated e.g. Sainsbury's working in partnership with Euro car parks. |
| MER2 | Boroughs should incorporate monitoring and enforcement strategies within their parking strategies. |
| MER3 | Enforcement of Blue Badge scheme within off-street car parks is required to prevent bays from being misused. |
| MER4 | The penalties for misuse of badges and bays should be increased as a deterrent for misuse. |

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Appendix A - Information for Blue Badge Holders on Parking in the Royal Borough of Kingston

On-Street Parking – On yellow line waiting restrictions	
Parking Benefits	Conditions
<p>Parking is allowed on single or double yellow lines for up to three hours, except where there is a ban on loading or unloading.</p> <p>(N.B. loading is indicated by one or two yellow marks (blips) on the kerb and on black on white time plates on posts displayed at the kerbside)</p>	<p>The Blue Badge and special blue parking disc (clock) showing the time of arrival must be displayed.</p> <p>A driver may not return to park in any part of that road until at least one hour has passed since the last time they parked there.</p>
On-Street Parking – In Controlled Parking Zone (CPZ) Parking Bays	
Parking Benefits	Conditions
<p>Parking is allowed free of charge and without time limit in any permit holder, meter, pay & display only or shared-use (permit and pay & display) on-street parking bays in the Borough (providing the use of that bay has not been suspended).</p> <p>In addition Badge Holders do not need to observe the maximum stay limit in “free” limited stay bays</p>	<p>The Blue Badge must be displayed (N.B. the concession allowing you to use permit holder bays in Kingston does not apply nationally. You are advised to contact other local authorities to check their parking arrangements in advance)</p>
<p>You MUST NOT park</p> <ul style="list-style-type: none"> - In Loading Bays, Doctors Bays, Taxi Ranks or Bus Lanes - On Bus Stops, pedestrian crossing zig-zag markings or School “Keep Clear” markings during the hours shown on yellow “No Stopping” plates - On the footway unless in a signed exemption area. 	

On-Street Parking - In Designated Disabled Parking Bays	
Parking Benefits	Conditions
<p>Specially reserved parking places are provided throughout the Borough for use by Blue Badge holders</p> <p>In many of the bays badge holders may park without time limit. However, in some of these bays the Council has imposed a maximum stay period of either 2 or 3 hours and Badge holders should check adjacent signs to see if this is the case when parking.</p>	<p>In unlimited stay bays the Blue Badge must be displayed.</p> <p>In limited stay bays the Blue Badge and special blue parking disc showing the time of arrival must be displayed</p> <p>Wherever possible Badge Holders should use these spaces in preference to parking on yellow lines</p>

Off-Street Parking – Council Operated “Pay & Display Car” Parks Ashdown Road, Bittoms MSCP, Blagdon Road MSCP, Canbury Place, Malden Centre, St Philips & Thameside	
Parking Benefits	Conditions
<p>Specially reserved wide parking places are provided in all surface and multi-storey car parks (MSCP). If these bays are full Badge holders may park in any of the other parking bays. You may park free of charge and without time limit.</p>	<p>The Blue Badge must be displayed</p>
Off-Street Parking – Council Operated “Pay on Foot” Car Parks Cattle Market & Drapers MSCP’s	
Parking Benefits	Conditions
<p>Specially reserved wide parking places are provided for use by Blue Badge holders. However, if these bays are full Badge holders may park in any of the other parking bays</p> <p>Parking is free of charge for Badge holders.</p>	<p>Your special parking disc (clock) must be displayed.</p>

To take advantage of free parking Badge holders should take their Blue Badge and car park ticket to the car park office where the ticket will be validated to allow free exit. The offer of free parking will only be given if the Badge holder is in the car at the time of exit.

Off-Street Parking – Privately Operated Car Parks

Parking Benefits

Conditions

Eden Walk (MSCP) -

Specially reserved wide parking places are provided. If these bays are full Badge holders may park in any of the other standard parking bays

Free parking for up to three hours is allowed after which the standard hourly tariff applies

To take advantage of free parking Badge holders should take their Blue Badge and car park ticket to the car park office where the ticket will be validated to allow free exit

Bentalls (MSCP), Bishops Hall, Brook Street, Fairfield (MSCP), John Lewis, St James's Road (MSCP) & Seven Kings (MSCP)

Specially reserved parking places are provided. If these bays are full Badge holders may park in any of the other standard parking bays.

Normal parking charges apply for Badge Holders

This leaflet has been produced for information purposes only and should be read in conjunction with the Department for Transport leaflet "The Blue Badge Scheme – Parking concessions for disabled and blind people" ref. T/INF/222.

DIRECTORATE OF ENVIRONMENTAL SERVICES March 2005



Appendix B - Off-street car park survey of Blue Badge holders

A survey of Blue Badge holders is being undertaken on behalf of the Greater London Authority (GLA) and the London Development Agency (LDA). The aim of the survey is to better understand the quality and provision of Blue Badge parking spaces and any difficulties badge holders may experience when parking in London. The results of the research will be used by the GLA's Planning Decisions Unit to provide policy guidance for the next London Plan.

Q1. In which borough / local authority do you live? _____

Q2. Do you have a borough specific parking permit, in addition to your Blue Badge, from:

- ☐ Camden
- ☐ Westminster
- ☐ Kensington & Chelsea
- ☐ City of London
- ☐ Other – please tell us _____

Q3. Do you drive your own vehicle? Yes ☐ No ☐

Q4. Do you drive from a wheelchair? Yes ☐ No ☐

Q5. Do you need extra space to access your vehicle? Yes ☐ No ☐

Q6. If yes, do you need the space:

- ☐ On the driver's side
- ☐ On the passenger's side
- ☐ At the back

Q7. Where do you need to park in relation to your destination?

- ☐ As near as possible to the entrance
- ☐ Within 50 metres of the entrance
- ☐ I can walk / wheel further if necessary

Q8. Do you have any difficulties parking at venues (shops, hospitals, residential housing, college, leisure centres) in London?

- ☐ No
- ☐ Yes If 'yes' please state _____

Q9. If yes, is this because:

- ☐ There are not enough spaces available;
- ☐ Spaces are not accessible (size, location etc);
- ☐ Spaces are occupied by non-Blue Badge vehicles;
- ☐ Other, please explain.....

Q10. Do you have any examples of good and bad practice car parks in London? (please state car park & location)

Good example _____ why? _____

Bad example _____ why? _____

Q11. Overall, how satisfied are you with the number and location of bays in off-street car parks?

Very satisfied ☐ Fairly satisfied ☐ Neither satisfied or dissatisfied ☐

Fairly dissatisfied ☐ Very dissatisfied ☐ Please explain _____

Q12. Gender: ☐ Male ☐ Female

Q13. Age: ☐ 17-25 ☐ 26-45 ☐ 46-65 ☐ 66+

Q14. Ethnic Group:

- | | |
|----------------|---|
| White | <input type="checkbox"/> British |
| | <input type="checkbox"/> Irish |
| | <input type="checkbox"/> Other please state _____ |
| Asian or Asian | <input type="checkbox"/> Indian |
| British | <input type="checkbox"/> Pakistani |
| | <input type="checkbox"/> Bangladeshi |
| | <input type="checkbox"/> Other please state _____ |
| Black or Black | <input type="checkbox"/> Caribbean |
| British | <input type="checkbox"/> African |
| | <input type="checkbox"/> Other please state _____ |
| Mixed Ethnic | <input type="checkbox"/> White & Black Caribbean |
| Origin | <input type="checkbox"/> White & Black African |
| | <input type="checkbox"/> White & Asian |
| | <input type="checkbox"/> Other please state _____ |
| Chinese | <input type="checkbox"/> Chinese |
| | <input type="checkbox"/> Other please state _____ |

Blue Badge Holder Interview Surveys, Thursday 30th March 2006

Produced by The Paul Castle Consultancy

Data: Blue Badge Holder Interviews

Location: Canary Place, 0900-1300hrs

Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q8a	Q9	Q10 GOOD	Q10 BAD	Q11	Q12	Q13	Q14	TIME
NEWHAM	N	Y	N	N		A	N			NONE	NONE	B	F	C	H	09:20
TOWER HAMLETS	N	Y	N	N		C	N			NONE	NONE	A	M	D	A	09:50
BROMLEY	N	Y	N	N		C	N			NONE	NONE	B	F	C	O	10:05
TOWER HAMLETS	N	Y	N	N		C	Y	HOSPITALS	A+C	NONE	NONE	B	F	D	A	10:10
TOWER HAMLETS	N	Y	N	Y	A	C	Y	WEST END	A+B	NONE	NONE	B	M	B	A	10:35
BEXLEY	N	Y	N	Y	A	B	Y	HOSPITALS	A	NONE	NONE	B	F	B	A	10:40
TOWER HAMLETS	N	Y	N	N		A	N			NONE	NONE	A	F	C	A	12:30

Notes:

NO TIME LIMIT FOR BBH

DISABLED BAYS = 21

NON BBH SEEN PARKED IN BAYS = 1

REFUSALS = 1

Blue Badge Holder Interview Surveys, Thursday 30th March 2006

Produced by The Paul Castle Consultancy

Data: Blue Badge Holder Interviews

Location: Canary Place, 0900-1300hrs

Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q8a	Q9	Q10 GOOD	Q10 BAD	Q11	Q12	Q13	Q14	TIME
NEWHAM	N	Y	N	N		A	N			NONE	NONE	B	F	C	H	09:20
TOWER HAMLETS	N	Y	N	N		C	N			NONE	NONE	A	M	D	A	09:50
BROMLEY	N	Y	N	N		C	N			NONE	NONE	B	F	C	O	10:05
TOWER HAMLETS	N	Y	N	N		C	Y	HOSPITALS	A+C	NONE	NONE	B	F	D	A	10:10
TOWER HAMLETS	N	Y	N	Y	A	C	Y	WEST END	A+B	NONE	NONE	B	M	B	A	10:35
BEXLEY	N	Y	N	Y	A	B	Y	HOSPITALS	A	NONE	NONE	B	F	B	A	10:40
TOWER HAMLETS	N	Y	N	N		A	N			NONE	NONE	A	F	C	A	12:30

Notes:

NO TIME LIMIT FOR BBH
 DISABLED BAYS = 21
 NON BBH SEEN PARKED IN BAYS = 1
 REFUSALS = 1

Blue Badge Holder Interview Surveys, Thursday 30th March 2006

Produced By The Paul Castle Consultancy

Data: Blue Badge Holder Interviews

Location: Stratford MSCP, 1400-1700hrs

Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q8a	Q9	Q10 GOOD	Q10 BAD	Q11	Q12	Q13	Q14	TIME
ROMFORD	N										STRATFORD- NOT ENOUGH DOOR OPENING SPACE	A	M	D	A	14:15
NEWHAM	N	Y	N	Y	A	A	Y	NEWHAM GENERAL HOSPITAL	A+B	CANNING TOWN - ALWAYS FIND A SPACE	GREEN STREET-NO DISABLED SPACES	D	F	B	A	14:30
POPLAR	N	Y	N	Y	B+C	C	Y	ABBOTTS ROAD POPLAR	A+B	NONE	NONE	B	M	B	E	14:40
								NEWHAM GENERAL HOSPITAL								
NEWHAM	N	Y	N	N		A	Y		A+B	NONE	NONE	D	M	C	A	14:45
REDBRIDGE	N	Y	N	Y	B+C	A	Y	UCH HOSPITAL	A+B	ALL SINGLE YELLOW WILL DO		B	M	C	D	14:50
ROMFORD	N	Y	N	Y	A	C	N			NONE	NONE	B	F	C	A	15:00
NEWHAM	N	Y	N	Y	A	B	Y	RESIDENTIAL	B+C	NONE	NONE	B	F	C	H	15:10
TOWER HAMLETS	N	Y	N	Y	A	A	Y	ROYAL LONDON HOSPITAL	A+B	WAITROSE + SAINSBURY'S PLENTY OF SPACES	ROYAL LONDON HOSPITAL	B	F	C	A	15:10
NEWHAM	N	Y	N	Y	B	A	N			NONE	NONE	B	M	C	I	15:15

TOWER HAMLETS	N	Y	N	N		C	N				NONE	A	M	B	A	15:30
NEWHAM	N	Y	N	N		A	N				TESCO + SAINSBURY'S PLENTY OF SPACES	NEWHAM HOSPITAL				
NEWHAM	A+C+D	Y	N	Y	B	C	Y	HOSPITALS	A+B		NONE	C	F	B	A	15:55
NEWHAM								NEWHAM GENERAL HOSPITAL	A+B		TESCO + SAINSBURY'S PLENTY OF SPACES	GIBBONS ROAD STILL GIVEN TICKET ON SINGLE YELLOW				
ISLE OF DOGS	N	Y	N	N		B	Y				NONE	B	F	B	A	15:55
STRATFORD	N	Y	N	N	B	C	N				NONE	B	F	B	A	16:05
											NONE	A	F	C	H	16:10
ILFORD	N	Y	N	N		A	Y	EDMONTON SHOPS ONLY 4 BAYS	A		TESCO + SAINSBURY'S PLENTY OF SPACES	GOODMAYES REDBRIDGE LACK OF SPACES	M	C	D	16:10
NEWHAM	N	Y	N	Y	B	C	Y	EVERYWHERE	A+B		NONE	WHEELCHAIR INTO HOMERTON HOSPITAL ONLY 2 SPACES	M	C	A	16:20
STRATFORD	N	N	N	Y	B	C	Y	HOSPITALS	A		NONE	D	F	B	A	16:20
STRATFORD	A+C+D	Y	N	N		C	N				NONE	A	M	B	B	16:25
Notes: NO TIME LIMIT FOR BBH DISABLED BAYS = 28 NON BBH SEEN PARKED IN BAYS = 5, REFUSALS = 0																

Blue Badge Holder Interview Surveys, Friday 31st March 2006

Produced by The Paul Castle Consultancy

Data: Blue Badge Holder Interviews

Location: Sainsbury's Camden, 0900-1300hrs

Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q8a	Q9	Q10 GOOD	Q10 BAD	Q11	Q12	Q13	Q14	TIME
CAMDEN	N	N	N	N		B	N			NONE	NONE	A	M	D	A	09:10
CAMDEN	N	Y	N	N		C	Y	UCH HOSPITAL	A	SAINSBURY'S CAMDEN GOOD WIDTH	TESCO HORNCHURCH NARROW SPACES	B	F	B	A	09:15
BRENT	A+C+D	Y	N	Y	A	C	Y	HOSPITALS	A+B	SAINSBURY'S CAMDEN GOOD WIDTH	ST THOMAS HOSPITAL NOT ENOUGH SPACES	A	M	A	I	09:17
CAMDEN	N	Y	N	N		A	Y	HOSPITALS	A+B	SAINSBURY'S CAMDEN GOOD WIDTH	HAMPSTEAD NOT ENOUGH PARKING	D	M	D	A	09:30
CAMDEN	N	Y	N	N		A	N			SAINSBURY'S CAMDEN GOOD WIDTH	ROYAL FREE HOSPITAL NOT ENOUGH SPACES	E	M	D	A	09:30
CAMDEN	N	Y	N	N		B	Y	HOSPITALS	A	SAINSBURY'S CAMDEN GOOD WIDTH	UCH HOSPITAL NO BBH SPACES	D	F	D	B	09:35
CAMDEN	N	Y	N	N		C	N			NONE	NONE	A	F	B	A	09:35
CAMDEN	N	Y	N	Y	A	B	Y	EVERYWHERE	A+B	SAINSBURY'S CAMDEN	THE GROUND MUST BE	A	M	D	A	09:40

Blue Badge Holder Interview Surveys, Friday 31st March 2006

Produced by The Paul Castle Consultancy

Data: Blue Badge Holder Interviews

Location: Soho Master Park, 1400-1700hrs

Notes: NO TIME LIMIT FOR BBH
DISABLED BAYS = 4
NON BBH SEEN PARKED IN BAYS = 3
BAY 1 USED BY CAR PARK MANGEMENT, STILL THERE ON LEAVING
BAY 2 USED BY SOMEBODY WHO CLAIMED TO BE WORKING FOR WSCC WHEN WE ASKED IF THEY WERE BBH, VEHICLE STILL THERE 17:00
BAY 4 USED BY SOMEBODY (ELSE!) WHO CLAIMED TO BE WORKING FOR WSCC WHEN WE ASKED IF THEY WERE BBH, VEHICLE STILL THERE 17:00
BBH SEEN = NIL
REFUSALS = NIL
INTERVIEWS = NIL

Blue Badge Holder Interview Surveys, Saturday 1st April 2006

Produced by The Paul Castle Consultancy

Data: Blue Badge Holder Interviews

Location: The Rotunda 1400-1700hrs

Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q8a	Q9	Q10 GOOD	Q10 BAD	Q11	Q12	Q13	Q14	TIME
HOUNSLOW	N	Y	N	N		A	N			THE ROTUNDA GOOD WIDTH	WESTMINSTER NOT ENOUGH BAYS	A	M	B	E	15:15
ELMBRIDGE	N	Y	N	Y	A	A	Y	ROADSIDE SHOPS	A+C+D	THE ROTUNDA GOOD WIDTH	TESCO NEW MALDEN	C	F	C	A	15:35

Notes: NO TIME LIMIT FOR BBH

DISABLED BAYS = 21, TWO OF WHICH BLOCKED BY A BLUE CONTAINER-MOUNTED GENERATOR

NON BBH SEEN PARKED IN BAYS = 1

REFUSALS = 0

THE ROTUNDA IS A SPORTS CLUB

THIS IS A MEMBERS-ONLY CAR PARK

Other formats and languages

For a large print, Braille, disc, sign language video or audio-tape version of this document, please contact us at the address below:

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www.london.gov.uk

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Chinese

如果需要您母語版本的此文件，
請致電以下號碼或與下列地址聯絡

Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

Urdu

اگر آپ اس دستاویز کی نقل اپنی زبان میں چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.

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