

**Written Statement on behalf of Canary Wharf Group Plc ("CWG")**

**TRANSPORT**

**Matters 81 – 84: Car Parking Standards**

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**Matters 83: Car Parking: Residential**

**M83. Is the approach to disabled persons residential car parking set out in policies T6B, T6D and T6.1G-H justified, and would it be effective in helping to achieve sustainable development? In particular:**

- a) Is the requirement for a minimum of 3% of dwellings on residential developments of ten or more units to be provided with at least one designated disabled persons parking bay justified (Policy T6.1G(1))?**
- b) Is Policy T6.1G(2), relating to the potential provision of an additional 7% of dwellings being provided with a designated disabled persons bay, justified and would it be effective?**
- c) Are the detailed requirements of Policy T6.1H justified and consistent with national policy, and would they be effective?**

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1. The stipulation for all residential developments to be car-free (other than accessible parking) in PTAL 5 and 6 areas is unnecessarily restrictive. Many people require access to a car for a variety of reasons, especially families and the policy should be more flexible to account for this. It should be possible for larger units to have access to some car parking in new developments regardless of PTAL.
  2. Car ownership does not necessarily equate to regular peak hour or daily car trips, in fact many London residents prefer the convenience of public transport on a day to day basis but still require access to a car at the weekend. As stated in the Residential Car Parking document produced by TfL in December 2017 (Evidence Base document NLP/TR/003), a key finding under Part B (page 16) is that *"In half of households that own two cars, there is no one who drives to work"*. Furthermore, the Residential Parking Provision in New Developments document produced by TfL in 2012 (Evidence Base document NLP/TR/013) finds that only 24% of car owning households within inner London use their car 5 or more times per week during weekday peak periods (Figure 4.4) and in fact 56% of car owning households within inner London use their car less than once or twice a fortnight during weekday peak periods(Figure 4.4).
  3. Therefore Table 10.3 should be amended as set below, to make Policy T6.1 sound to allow for greater flexible to provide larger residential units with parking provision in areas of high PTAL.

**Table 10.3 Maximum residential parking standards**

Location	Maximum parking provision
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Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	<u>Car-free (studio/1 bed/2 bed)</u> <u>Up to 0.75 spaced per 3 and 4 bed dwelling</u>
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4. Additionally, vulnerable user groups such as the elderly that may not be eligible for blue badge (disabled) parking still require access to a car to overcome mobility issues and maintain connections with the community and independence, such as using a car for regular food shopping which is too heavy to carry on public transport. The reform of the blue badge application process in 2011/12 has led to a reduction in the number of blue badge holders. As of March 2018, 4.2% of the population in England hold a blue badge as noted in the Office for National Statistics, Blue Badge Scheme Statistics, England: 2018 document published by the Department for Transport (DfT) in November 2018.
5. The stipulation that blue badge parking should be provided at a minimum of 3% of units is unreasonably prescriptive and is much higher than the levels provided in recently consented developments, such as 255-279 Cambridge Heath Road (PA/18/01926), 82 West India Dock Road (PA/18/00528), Cuba Street (PA/15/02528), 50 Marsh Wall (PA/15/02671) and South Quay Square (PA/15/02104) – all of which provide c.1% of residential units with a disabled space.
6. As stated in the Residential Car Parking document (page 35) produced by TfL in December 2017 (Evidence Base document NLP/TR/003), the 3% requirement has been based on the Office for National Statistics Blue Badge scheme statistics (no publication date provided), which documents that 2.8% of Londoners hold a blue badge.
7. The Office for National Statistics, Blue Badge Scheme Statistics, England: 2018 shows that 2.6% of Londoners now hold a blue badge and for Inner London boroughs that percentage reduces to 2.0%. In fact, only 1.8% of the population in Tower Hamlets holds a blue badge, as shown in the excerpt below. Given the statistics provided by the Office for National Statistics, the 3% requirement for blue badge parking from the outset for residential units across London is unjustified and should be applied more flexibly based on local circumstances and evidence of blue badge holders specific to London Boroughs.

Figure 1: Excerpt from Office for National Statistics, Blue Badge Scheme Statistics, England: 2018 published by DfT (November 2018)

**Table 2: Top and bottom 5 local authorities for badges held as a proportion of the population: England, March 2018 ([DIS0108](#))**

Local Authority	%	Local Authority	%
St. Helens	6.8	Tower Hamlets	1.8
Dorset	6.6	Westminster	1.8
Sunderland	6.6	City of London	1.7
North Lincolnshire	6.5	Lambeth	1.7
Staffordshire	6.4	Kensington and Chelsea	1.5

8. The draft London Plan requirement to demonstrate as part of a Parking Design and Management Plan how a further 7% of residential units could be provided with a disabled space is wholly unjustified based on the evidence base presented above. As reported in the Office for National Statistics, Blue Badge Scheme Statistics, England: 2018 document the number of blue badges issued has fallen by 3.2% between 1 April 2017 and 31 March 2018 and over the same period the total number of badges held in England has decreased by 1.2%.

9. Therefore, Policy T6.1 should be amended to as follows in order to make it justified and sound:

G *Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units **should, where feasible** ~~must, as a minimum:~~*

*1) ensure that for ~~three~~ **up to two** per cent of dwellings **within Inner London boroughs and three per cent of dwellings in Outer London boroughs**, at least one designated disabled persons parking bay per dwelling is available from the outset. **Local circumstances including step-free public transport access and blue badge usage within individual boroughs should also be considered in applying this requirement.***

*2) demonstrate on plan and as part of the Parking Design and Management Plan, how an additional ~~seven~~ **two** per cent of dwellings could be provided with a designated disabled persons parking space in future upon request. This should be provided as soon as existing provision is shown to be insufficient.*