

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?**

- 83.1 The approach to disabled persons car parking set out in policies T6 B, T6 D and T6.1 G-H is justified and will be effective. This approach is necessary to ensure that sufficient provision is available for all new residential development, which in turn can support the creation of strong and inclusive communities (Policy GG1) and the delivery of the homes Londoners need (Policy GG4). This Policy forms part of the draft Plan's overall approach to car use, ownership and parking that seeks to ensure development is sustainable in economic, environmental and social terms, while ensuring the Mayor and TfL can meet their duties under the GLA Act 1999 (to improve health and reduce health inequalities) and the Traffic Management Act 2004 (to manage the road network).
- 83.2 Policy T6.1 ensures that new residential development considers the needs of disabled people, making it consistent with the 2012 NPPF, that states that, *"...developments should be located and designed where practical to [...] consider the needs of people with disabilities by all modes of transport"*.
- 83.3 The London Plan 2016 parking policy¹ requires 'adequate' parking provision for disabled people, rather than setting any minimum requirements, while supporting text highlights that boroughs should take into account local issues and estimates of local demand in setting appropriate standards. Further guidance was also provided through the Housing SPG, which set a standard for an accessible car parking space for each designated wheelchair accessible dwelling.
- 83.4 The draft London Plan sets out, for the first time, a Policy that quantifies the amount of disabled persons parking that should be provided, alongside the factors to be considered when planning for its provision. Policy T6.1 ensures provides for a consistent and minimum baseline of bays across all boroughs for 3 per cent of units and provides an approach for how an additional 7 per cent per cent of units could be provided for if required.
- 83.5 The 3 per cent and 7 per cent figures reflect the requirement for 10 per cent of new homes to be M4(3) 'wheelchair user dwellings', a vital element in ensuring that housing choice for disabled Londoners is widened. However, it is important to note that individual units may not all be occupied by a disabled person/a disabled person

¹ Policy 6.13

who requires a parking space at any given time and that a disabled person who requires a parking space may occupy a non-wheelchair user dwelling. Provision needs to be able to vary to reflect this. Policy T6.1 enables flexibility to ensure that there is provision of disabled parking bays for Blue Badge holders whether they live in M4(3) 'wheelchair user dwellings' or M4(2) 'accessible and adaptable dwellings' (as Blue Badge holders may not be wheelchair users). This ensures provision for disabled persons parking bays for residents of all types of dwellings within new developments.

- 83.6 This policy approach allows consideration of how provision might vary across different developments in different parts of London and provides a framework that can take account of site circumstances, local evidence and any relevant local policies. Other local considerations may also influence borough requirements, such as the approach to on-street provision or local design codes.
- 83.7 A Further Suggested Change has been proposed that clarifies that the approach to the provision of disabled persons parking secured at planning stage should be fully assessed and consistent with the inclusive design principles set out in Policy D3 (see appendix 1). The Further Suggested Change has also clarified that further detail on the proposed approach to disabled persons parking will be set out in guidance.

T6.1G(1) – three per cent of dwellings minimum standard

- 83.8 Policy T6.1 G specifies that residential developments should provide disabled persons parking bays for at least three per cent of dwellings from the outset. This standard is based on the proportion of Londoners who hold a Blue Badge, which are issued by local authorities to disabled people who meet certain criteria. At the time of release of the draft London Plan, 2.8 per cent of Londoners held a Blue Badge;² more recent statistics show that the level of Blue Badge holders has remained relatively consistent, now standing at 2.7 per cent of Londoners.³
- 83.9 The Policy will provide for a minimum level of provision at all residential development across London. Where a local need above this level is identified, the Policy allows flexibility for boroughs to require higher provision from the outset.

T6.1G(2) - provision for an additional seven per cent of dwellings

- 83.10 In addition to the initial requirement above, Policy T6.1 G requires that new residential development should also demonstrate how additional disabled persons car parking spaces could be provided for a further seven per cent of dwellings. This approach will ensure that genuine choice in suitable housing is available for those who require a disabled person parking space at developments where the demand for spaces exceeds initial provision. Not providing all bays upfront in instances where it is not required avoids potential abuse of spaces, particularly in basements where regular enforcement may be less feasible.

² Department for Transport, Blue Badge Scheme Statistics, England: 2016, November 2016.

³ Department for Transport, Blue Badge Scheme Statistics, England: 2018, November 2018.

- 83.11 How initial and additional provision of disabled persons parking spaces will be made, managed and enforced should be set out in a Parking Design and Management Plan, which is required for any development providing car parking under Policy T6 of the draft Plan. As set out in the supporting text, applicants should provide details of how initial and future provision will be made, managed and enforced, and the availability of spaces should be made clear to residents prior to occupation, to inform housing decisions.
- 83.12 In developments with general parking, bays not provided at the outset should be clearly identified on plan. They can be designed as enlarged bays and marked up if and when they are required as additional disabled persons parking. A Minor Suggested Change was made to clarify that, in these instances, bays should not be sold, but instead leased on a sufficiently short-term basis to allow reallocation as disabled persons parking⁴.
- 83.13 Where there is no general parking provision in the development, disabled persons car parking should still be provided (as stated in Policy T6 B). Guidance will set out how disabled persons parking within car free development should be approached, including how on-site and off-site provision should be approached in line with inclusive design principles. In these car-free developments, the ability to provide nearby on-street spaces should be assessed, and these spaces should then be requested and converted to disabled persons parking bays when they are required. This follows the process used when Blue Badge holders move into homes in much of the existing housing stock and that which is also already used for new development in a number of inner London boroughs. In these instances, a Controlled Parking Zone (CPZ) should be in place to limit the use of the spaces to residents (CPZs are already in place in the majority of areas proposed to have car-free standards).

Detailed requirements

- 83.14 Policy T6.1 H1 sets out that where disabled persons parking is provided at a new residential development, it is expected that these spaces will be for the use of residents only. This ensures that residents who hold a Blue Badge can access parking close to their home when required. This is particularly important in areas of London that may attract visitors or provide services people wish to access, where the bays could otherwise be used by non-resident Blue Badge holders, preventing residents from using them. This can be achieved by limiting non-residents' access to residents' parking areas, or if provision is on-street, through the use of a CPZ, as described above.
- 83.15 T6.1 H2 states that disabled persons parking should not be allocated to specific dwellings. This is to prevent spaces being allocated to a dwelling when it is not actually being occupied by a disabled person, which could result in disabled people in other dwellings not being able to access an enlarged space that meets their requirements.

⁴ Minor Suggested Change MSC.10.57.

- 83.16 T6.1 H3 requires applicants to pay a commuted sum to fund future provision of disabled persons parking if it will be provided on-street. This is required to provide boroughs with the funding needed to convert on-street spaces to disabled persons parking bays if later required.
- 83.17 Disabled persons parking should count towards, and not be in addition to, the maximum standards, as per T6.1 H4 - in effect giving priority to disabled persons parking over general parking provision. An exception to this is applied at otherwise 'car-free' developments. This approach allows for disabled persons parking to be provided as part of sustainable development by managing the overall impacts of traffic generated by new homes.
- 83.18 T6.1 H also sets a clear framework for the provision of disabled parking bays, including ensuring they meet minimum design standards. This will ensure that, alongside Policy D3 Inclusive design, key standards will be met to meet the needs of future disabled residents. Further detail on the standards will be set out in guidance.
- 83.19 Policy T6.1 H5 requires spaces to be designed in accordance with the British Standard BS8300 volume 1. This provides design standards for designated off-street and designated on-street disabled persons parking bays, ensuring the bays are designed and located to meet the needs of Blue Badge holders. While M4(2) and M4(3), as described by the Building Regulations, both contain design requirements for disabled persons parking bays, these are not applicable where bays are not allocated to specific dwellings, which will be the case in many developments. To provide sufficient flexibility in the different potential contexts they are likely to be used in, the generic design standards provided in the British Standard BS8300 volume 1 are therefore recommended to satisfy the requirements of different users, in different scenarios and settings. The British Standard is also regularly updated, so the Policy will remain up-to-date over time.
- 83.20 The requirements of Policy T6.1 H6 will ensure that the disabled persons parking bays can be used effectively, requiring that spaces are suitably located, taking into account the diversity of their users' requirements, and that residents do not encounter physical barriers when travelling from a disabled persons parking bay to their dwelling.
- 83.21 As set out in Policy T6 D, appropriate disabled persons car parking should also be provided in non-residential contexts. This issue is considered in further detail in the Mayor's response to Matter M84.

Appendix 1: M83 Further Suggested Changes

- **Blue** – new text
- ~~Blue~~ – deleted original plan text
- ~~Purple~~ – deleted Minor Suggested Change text
- **Red** – Minor Suggested Changes new text
- ~~Red~~ – Minor Suggested Changes deleted text

Change ref no	Policy/para /table/map	Further suggested change
83.1	Policy T6.1, part G	<p>G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:</p> <ol style="list-style-type: none"> 1) ensure that for three per cent of dwellings, ensure that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset 2) demonstrate on plan and as part of the Car Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as with a designated disabled persons parking space in the future upon request. This should be provided as soon as existing provision is shown to be insufficient. This should be secured at the planning stage. If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future.
83.2	Paragraph 10.6.9	<p>The Mayor's ambition is for London to be a city where it is easy for all disabled people to live and travel in London. Disabled people should have a genuine choice of housing that they can afford within a local environment that meets their needs. This means taking a holistic approach to creating streets, local services and a public transport network that caters for disabled people and people with long-term health conditions. It is recognised that some disabled people will rely on car travel more than others, whether as a passenger or a driver. This means that to ensure genuine housing choice, disabled persons' parking should be provided for new residential developments. In some circumstances this may include visitor parking for disabled residents who might have regular visitors such as carers. Any such parking should be marked out as such and restricted only for these users from the outset.</p>
83.3	Paragraph 10.6.9A	<p>10.6.9A Where general parking is provided on-site, any disabled persons parking bays not provided at the outset should be identified on plan. For car-free development, how provision will be made, including whether bays are provided on-site or on-street, should be clearly set out and justified, in line with relevant guidance and local policies. All provision should be fully assessed and demonstrably consistent with the inclusive design principles of Policy D3 (Inclusive design), and GG1 (Strong and inclusive communities); further</p>

		information on how disabled persons parking should be approached and delivered will be set out in guidance.
83.4	Paragraph 10.6.10	10.6.10 Through Car Parking Design and Management Plans, applicants should provide details of how initial and future provision of disabled persons parking spaces will be made, managed and enforced. They should show where these spaces will be located and demonstrate how their availability will be made clear to residents prior to occupation to inform their housing decision. Where a bay is being marked up for a particular resident, this should be done prior to occupation. Details should also be provided of how existing or future residents would request a bay, how quickly it could would be created and what, if any, provision of visitor parking for disabled residents is available. At In car-free developments, at no time should any on-site space marked on plan for future disabled persons parking be used for general parking. This does not apply when it is proposed to convert an existing on-street parking bay.
83.5	Paragraph 10.6.12A	10.6.12A Parking spaces should be leased rather than sold to ensure the land they take up is used as efficiently as possible over the life of a development. This includes enabling ensuring that disabled persons parking bays to be can be used by those who need them at any given time and that enlarged bays are available to be converted to disabled persons parking bays as required. Leasing allows for spaces with active charging points to serve electric or other Ultra-Low Emission vehicles, and can more easily support passive provision becoming active. Leasing also supports parking provision to be adaptable to future repurposing, such as following changes to transport technology or services. Leases should be short enough to allow for sufficient flexibility in parking allocation to reflect changing circumstances.