

M83 Written Statement from Just Space 2718

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 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))?

The Leonard Cheshire organisation in its Disability Facts & Figures briefing ¹ explains that there are more than 11 million disabled persons in the UK; that 1 in 5 of us will be affected by disability at some point in our lives. Consequently, the proposed requirement for a minimum of 3% of dwelling etc. in Policy T6.1 clause G (1) is significantly inadequate. This is particularly so since the current London Plan Policy 3.8 Housing Choice, that is clause D, requires 10% of new houses to be wheelchair accessible or easily adaptable for occupation by a wheelchair user. This effectively requires 1 parking bay for 10% of the total number of residential units, even when car free developments (see para 4.3.18 of Accessible London SPG 2014²). The Mayor is proposing a retrogressive step and diminishing the likely provision of disabled persons' parking spaces.

With a present context of unrecognised demand and need, and the growing ageing population living with impaired mobility, policies for disabled persons' car parking are not precise and emphatic enough to ensure that London becomes fully accessible and user friendly to all as soon as possible.

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?

Demonstrating that existing provision is insufficient is not straightforward. There is a real danger that Councils will feel unable to commit resources to gathering evidence, and, therefore, will fail to take action. The Leonard Cheshire organisation in 2014 found that following Freedom of Information requests (288 authorities; 76% response rate) only 9% of Councils could provide any information on how many homes were built to wheelchair accessible standards in the previous 3 years³. Just Space

¹ <https://www.leonardcheshire.org/about-us/disability-facts-and-figures>

² <https://www.london.gov.uk/file/20232/download?token=qk8waMKd> "This policy [3.8] references the 'Wheelchair Housing Design Guide'³⁶ (WHDG) which requires one parking bay for every wheelchair accessible or easily adaptable home (so 10% of the total number of residential units). Any residential development, even when car free, should comply with London Plan Policy 3.8 and provide adequate parking for the wheelchair accessible or easily adaptable units, preferably on-site".

³ <https://www.leonardcheshire.org/sites/default/files/no-place-like-home-leonard-cheshire-disability.pdf.pagespeed.ce.2HcEbJ3zI5.pdf>

accordingly reasons: that given this dearth of monitoring, the proposals for future monitoring and effective activation through this clause are most unlikely to materialise. Therefore, the policy is rendered ineffective and non-deliverable on the provision of disabled persons' parking spaces.

c) Are the detailed requirements of Policy T6.1H justified and consistent with national policy, and would they be effective?

The NPPF 2012 at para 57 states that it is important to plan positively for the achievement of high quality and inclusive design for all development including buildings and their surrounding spaces to ensure that they can be accessed and used by everyone (Annex 2). Supporting Planning Policy Guidance on Design identifies issues to consider including parking spaces and setting down points.

There is an equalities dimension arising from the Equality Act 2010 and the Public Sector Equality Duty, that there is a duty to make reasonable adjustments, including in anticipation of the needs of disabled persons. In plan-making and on parking for disabled persons, this should be reflected in the stipulations for adequate and appropriate car parking.