EALING COUNCIL PARKING AND LOADING PLAN 2019



EALING COUNCIL



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1 Executive Summary

This Parking & Loading Plan seeks to effectively manage parking on the street network in the London Borough of Ealing. The Vision for Parking in the Borough links this plan with the Ealing Transport Strategy and its three core objectives:

- 1. Mode Shift
- 2. Reducing the Environmental Footprint of Transport
- 3. Improving Road Safety

In turn these core objectives are underpinned by four main transport principles based on: improving health and well-being, improving air quality and environment, providing an efficient and safe transport network plus supporting good growth. In addition, there are Policy Actions which demonstrate how the objectives and principles will be directly applied to interventions and projects.

Parking controls and enforcement support these core objectives and principles in a number of ways such as enabling good visibility at junctions for road safety and ensuring parked vehicles do not obstruct cycling infrastructure.

The implementation programme demonstrates how and when the Council will introduce parking measures to effect positive change. Initiatives aim to manage parking effectively and fairly. These include the review and implementation of Controlled Parking Zones for residual and commercial areas, parking around schools, differential parking charges by vehicle emissions, and the introduction of red route restrictions on the Uxbridge Road corridor to improve road safety and reduce congestion.

This plan also gives details of new and enhanced parking services offered such as paying for parking by mobile phone, the rollout of the on-street EV charge point network and the development of car club services to offer 'floating car club' services right across the Borough.

Innovative developments in the transport and parking sector including a possible Workplace Parking Levy and Connected Autonomous Vehicles and likely implications are also reviewed in this document.

Finally, in support of the Council's growth ambitions, the plan outlines what is appropriate in terms of parking for developments (including disabled parking) and also freight and loading for business.

2 Introduction

The Parking & Loading Plan fits under the Ealing Transport Strategy (TS) family of plans in the following ways:

- It follows TS objectives mode shift, road safety and air quality benefits
- It provides detail on the policies and projects in the Transport Strategy
- It provides information about on street, off street parking, blue badge parking provision and freight/deliveries



The Vision for the Transport Strategy is:

Within the context of good growth, to improve streets and transport infrastructure to reduce dependency on cars to prioritise active, efficient and sustainable travel modes, making Ealing a healthier, cleaner, safer and more accessible place for all.

3 The Way Forward

3.1 Vision for Parking in the Borough

To align the Borough's Parking Service with the Borough's Transport Strategy objectives, whilst managing parking space effectively and fairly

3.2 Meeting the Transport Strategy Objectives

3.2.1 Transport Strategy Objectives

The primary objectives of the Parking & Loading Plan are to help deliver the objectives of the Transport Strategy. The three main transport objectives which will set the transport policies for the Borough:

- 1. **Mode Shift** reducing the dependency on the motorised vehicle by moving trips, particularly the shorter ones, to active travel using more sustainable modes (walking, cycling and public transport) through behaviour change.
- 2. Reducing the environmental footprint of transport particularly improving the Borough's air quality by encouraging the use of active travel modes and using the cleanest engines and fuels.
- 3. **Improving road safety** making the Borough roads as safe as possible, particularly for those modes perceived to be more vulnerable, i.e. walking and cycling.

It is acknowledged that to meet these objectives, a significant shift in the way parking is controlled and enforced could be necessary.

3.2.2 How Parking Controls and Enforcement Meets these Objectives

Parking and Road Safety

One of the primary reasons for implementing parking control is to improve road safety. On-street parking in urban areas is associated with several safety problems, these include:

- parked vehicles blocking the sight distance of pedestrians, cyclists, or of drivers entering an intersection
- vehicles blocking through traffic while trying to enter/exit a parking space
- conflicts with cyclists and pedestrians (e.g. a car door opened into the path of a cyclist)
- through traffic (including cyclists) trapped in the kerbside lane which ends suddenly due to parked vehicles.

Parking and Air Quality

Road based transport has a significant impact on local air quality; 60% of small particles come from road transport, from tyre and brake wear and exhaust emissions¹. Some 63% of Nitrogen Oxides are believed to come from 'ground-based transport', most of which is road transport².

Parking Services can contribute to achieving this air quality objective by incentivising cleaner vehicles and discouraging the use of higher emitting vehicles. The Ealing Transport Strategy has already made the commitment to base parking charges on emissions, but the provision of on and off-street Electric Vehicle Charging Points (EVCPs), which require parking space for a vehicle to park whilst charging, is also part of the solution.

Parking and Mode Shift

Numerous studies have shown that parking cost and availability of parking does make a difference to modal choice³. In addition, 31% of vehicle-based trips in the Borough are less than 3km⁴, meaning that they are easily walkable or cyclable. Limiting the supply or charging for parking around key destination points such as town centres, stations etc. would reduce the opportunity for driving and potentially increase the use of active

²Ibid.

¹ Improving the Health of Londoners Transport Action Plan (2014) TfL.

³ Melia, S., Clark, B. (2018) 'What happens to travel behaviour when the right to park is removed?', *Transport Policy*, 72 (1), 242-247.

⁴ London Travel Demand Survey data 2014/14 to 2015/16, TfL.

modes. This also applies to new housing and workplace developments, where travel modes can be set from the start of occupation.

It is claimed that without sufficient parking spaces, people are less likely to visit town centres, however, studies have shown that those that arrive to town centres by walking and cycling modes spend more over the course of a month or a year than those that come by car. The main reason for that is that these people make several journeys per week to the town centre and their cumulative spend is higher. As a result, imposing reduction in the number of spaces available in or around a town centre is unlikely to have a significant impact upon the town's economy — provided that walking and cycling improvements are made at the same time.

Parking also takes up a lot of carriageway space - which could be used for more desirable purposes such as making the pavement wider or adding cycle lanes. Evidence shows that a pleasant town centre public realm where the pavements are comfortable for walking in is a key indicator for economic vitality. The Transport Strategy already contains the policy that parking will be removed where it is a barrier for active travel, this is particularly applicable to many of the Borough's town centres where a disproportionate amount of carriageway space has been dedicated to parking and motor vehicles.

Similarly, there are many locations where parking is available for free close to town centres or stations for long periods of the day. This encourages driving to these locations even though for many such journeys are easily walkable or cyclable. This also has a significant negative impact on those living in the vicinity of key destinations within the Borough.

Managing Parking Space Effectively and Fairly

As part of the Council's drive to provide easy access to its products and services online, Parking Services are offering a wide range of services accessible from the Council's website at <u>http://www.ealing.gov.uk/parking</u>

4 Policies

Policy Goal	Policy Action	Example Projects
Improving Road Safety	• To implement robust parking controls and enforcement around schools	 CCTV enforcement of school zig- zags Perfect Parking Campaign School Streets
	• To implement robust parking controls and enforcement where sightlines (drivers, cyclists or pedestrians) are compromised by parked vehicles	 Implement and enforce parking and loading controls on junction/street corners Implement new CPZs
	 To prevent parking from blocking bus lanes, footpaths driveways and cycleways 	 No new and review existing footway parking schemes Review and enforce parking and loading controls in bus and cycle lanes To remove the 10-minute concession around schools Consider cycle lane camera enforcements if this is legalised by Central Government.
	• To ensure that larger vehicles park and load in safe locations	 Investigate the impact of larger vehicles on CPZ and on-street parking design with the intention of implementing recommendations All future developments should incorporate loading off street to avoid creating road safety risks
Improving Air Quality	 To base all parking charges on emissions 	 Implement emissions-based charging for parking permits Implement emissions-based charging for pay and display and Council owned off street parking Introduce parking charges for motorcycles Investigate potential and impact of a peak hours parking charge
	• To implement robust parking controls and enforcement on strategic roads to prevent traffic congestion	 Investigate, with the intention to implement, a red route on Uxbridge Road
	 To implement and prioritise a network of EVCPs across the borough 	 Implement rapid, fast and lamp column EVCPs to ensure all residents are within a 10-minute walk of an EVCP
	 To significantly improve the network of car clubs using EVs 	 Include car club bays in all CPZs Car club operators must introduce EVs into their fleets and by fully electric by 2025

Inducing Mode Shift	 To prioritise active travel over motor vehicle parking where conflict exists 	 Investigate, with the intention to implement, a red route on Uxbridge Road Remove and no longer implement free stop and shop bays Pocket parks
	• To review parking pricing to make active travel more appealing	 Annual parking price review
	 To review parking provision around key destination locations 	 Implement new CPZs, particularly around town centres and stations Introduce Business CPZs in industrial parks and investigate the potential for a workplace parking levy.
	 Prioritise cycle parking facilities within residential parking schemes 	 Bike hangars in CPZs where there is no off-street parking for bikes (e.g. terraced houses, apartments/flats) Investigate adding cycle (and run) commuter changing/ shower facilities in town centre car parks
Making Parking Fairer and Easier to understand	 The hours of operation for CPZ will be simplified and made more uniform across the Borough 	 Significantly reduce the variations in hours of operation of CPZs across the Borough
Enhance the Customer Experience	 New technologies will be introduced to make paying for parking quicker and easier 	 Introduction mobile phone parking across the Borough
A Fair, Robust and Consistent Parking Enforcement Operation	 Reduce the fraudulent use of Blue Badge parking 	 Enforce and prosecute fraudulent users of Blue Badges

5 Implementation Programme

5.1 Controlled Parking Zones

5.1.1 Review and Implementation of Residential Controlled Parking Zones

Currently there are 51 CPZs in the Borough. These range in size, hours of operation, cost of permit, and range of parking opportunities (some provide shared use (i.e. paid and residential) parking, others do not. This means there are currently over 25 variations in the regulations for CPZs within the Borough, which creates confusion for users and creates difficulty providing an effective enforcement service. Consequently, the CPZs are not necessarily fit for the purpose of helping to contribute towards the Transport Strategy objectives.

The reasons for the variation are mostly historic, therefore this revised Parking Plan gives an opportunity to try and standardise the operation of CPZs and to make improvements to the area as a whole. In effect this means:

- All new CPZs will be all day CPZs. No new part time CPZs will be implemented.
- The Council will seek to make part-time CPZs within a 10-minute walking distance of key destination points such as town centres, stations, shopping parades and leisure centres, all day CPZs over the next 3-years.
- Whilst the consultation regarding the potential to install a CPZ will remain a significant element of the design and decision-making process, it will not be the only evidence used. The decision will take into account the feedback from local residents and businesses responding to the consultation, road safety and traffic flow and the environmental and air quality impact of parking and traffic.
- Increasing the hours of operation of CPZs in hotspots so as to allow parking enforcement to better tackle dangerous and inconsiderate parking.
- To create one single tariff for CPZ permit, no matter the length of the hours of operation.

Where CPZs are implemented, the Council intends to include additional elements into the design to further enhance air quality and mode-shift policies. This means that CPZs will now also include:

- Electric Vehicle Charging Points (the intention is to have a minimum of one EVCP per CPZ, including retro-fitting EVCPs to existing CPZs)
- Where the housing stock places physical limitations on cycle parking, cycle hangars will be included

The Council has already introduced parking permit charges based on the CO_2 emissions of the vehicle, which aligns with vehicle excise duty. CO_2 is a greenhouse gas, not an air pollutant/emission that has an impact on air quality (exhaust emissions). However, at the time of writing, the DVLA does not have comprehensive data on emissions that affect air quality for every vehicle, due to the lack of sufficiently accurate air exhaust emissions data. The DVLA is working towards collating additional data on exhaust emissions in conjunction with other agencies, and has made considerable strides forwards in recent months, enabling the introduction of TfL's Ultra Low Emission Zone. This will potentially enable the Borough to convert parking charges to EURO standards. EURO standards regulate the emissions of nitrogen oxides (NOx), total hydrocarbon (THC), non-methane hydrocarbons (NMHC), carbon monoxide (CO) and particulate matter (PM) and therefore, are a much better indicator of a vehicles impact on air quality.

The Council will also seek to reduce its costs of administrating CPZs through reviews of the technologies used for registration for permits and enforcement. This review would also include making it easier and more understandable for residents and businesses to apply for, renew and administer their permit accounts. Where administration costs can be saved, this may be passed onto users.

5.1.2 Business CPZs

An on-going issue has been the lack of parking control in business/industrial estates. This has led to a higher proportion of vehicular based trips for journeys to work when compared with other employment areas in the Borough. It has also resulted in road safety issues, access issues and other parking impacts on the surrounding (often residential) areas.

Other authorities have successfully implemented Business CPZs, which have enabled the Councils to significantly improve control and enforceability of parking in business/industrial estates. The Council will seek to implement Business CPZs in Park Royal and South Acton and investigate the potential for other business/industrial estates as required.

5.1.3 Work Place Parking Levy

A work place parking levy (WPPL) is a charge made by a local authority on employers who provide workplace parking for their employees. The revenue collected must be used to fund transport improvements in the local area providing economic and social benefits for existing employees and residents whilst facilitating more growth. The 2018 Mayors Transport Strategy provided Highways Authorities within London with the powers to implement WPPLs.

There are areas of the Borough, for example within the larger industrial estates, where the modal split for the car is much higher than the rest of the Borough. Often this is because there are plentiful amounts of free off-street parking available for workers and visitors alike.

The Council is looking at implementing a Business CPZ within the Park Royal and South Acton industrial estates and will monitor their effectiveness, however it also wishes to investigate the potential for a WPPL in addition to cover both on and off-street parking. To meet the requirements of the legislation, the funding would be used to enhance active travel modes including public transport with the specific aim of reducing vehicle-based journeys within these locations. It is planned that the investigations would start in 2019/20, with a potential public consultation in 2020/21 if the results of the investigation and mitigation measures were deemed feasible.

5.2 Short Term Parking

5.2.1 Differential Parking by Emissions

Differential parking based on CO₂ emissions was introduced for Residents' Parking Permits in February 2019. Parking Services intend to introduce this consideration across all on and off-street parking methods such as pay & display.

The introduction of emissions-based parking will require an update to the payment technology, so that the individual vehicle can be identified, and its pay-scale calculated in real time. Therefore, it is envisaged that the majority of spaces in the borough will operate on a phone payment basis. It is recognised that not everyone has access to a mobile telephone, therefore, other payment methods such as using PayPoint are being investigated (which could have benefits for local retailers). As a final resort, some existing payment machines will be retained, but will not offer any discounts for greener vehicles.

The Council expects to start rolling out emissions-based charging P&D parking across the Borough during 2020. As with the residents parking permit, the intention is to convert to charging based on air quality pollutants rather than CO₂ once the DVLA's database contains the required information as soon as possible.

5.2.2 Red Route on Uxbridge Road

The Uxbridge Roads is one of the Borough's most important routes; it connects five of the Boroughs Town Centres as well as being a strategic route for traffic travelling within and indeed through the Borough. The Uxbridge Road is the busiest Borough road in LB Ealing carrying up to 20,000 vehicles a day⁵, has some of the highest local cycle flows and up to 108 buses each hour⁶.

The Council's priority is to keep traffic moving and reduce delays, which will in turn bring air quality benefits. In addition, the Council wishes to promote a segregated cycle lane along the Uxbridge Road to make cycling safer; this can only happen if parking is controlled properly. Unfortunately, there has been an increase in selfish parking and loading along the Uxbridge Road, which blocks the existing cycle lanes, bus routes and bus stops, and the current enforcement regime is unable to cope. A red route would allow enforcement by camera and, therefore, be a much more effective regime at keeping the Uxbridge Road moving. It is recognised that suitable loading faculties will be required, particularly with the town centres.

In 2019 the Council started to design and consult upon a joint red route and segregated cycle lane along the length of Uxbridge Road, with the intention to start implementation from 2020.

⁵ Department for Transport, <u>https://www.gov.uk/government/organisations/department-for-transport</u>

⁶ Transport for London, tfl.gov.uk

5.2.3 Motorcycle Parking

Currently motorcycle parking with the Borough is provided free of charge both on-street and in off-street car parks. However, providing motorcycle parking still uses up road and car parking space, whilst motorcycles contribute to air pollution and traffic. Motorcycle travel is also dangerous when compared to other modes of transport. Additionally, it is being observed that the free motorcycle parking is being used up by motorcycle couriers waiting for their next delivery.

It is proposed, therefore, to introduce a charge for motorcycle parking.

5.2.4 Footway Parking

Footway parking (and loading) can come in many guises, two wheels on the kerb, parking fully on the footway, and parking on private forecourts (which is illegal unless there is a drop kerb and demarcation). However, footway parking can block the footway for pedestrians, and is particularly concerning for those with a mobility issue, a pushchair or with children and can create a road safety issue.

There are minimum footway widths set about in the Department for Transport's regulations⁷ to comply with the Equality Act 2010. The Council's policy is to remove parking where it is a barrier to active travel (walking and cycling), the Council will seek to implement restrictions where footway parking is a significant issue, and to enforce against footway parking where possible and practical.

5.2.5 Review of Free Parking/Stop and Shop

At the time of writing, the Council has many different variations of free parking in important locations (normally around local shopping parades) from 10-minute stop and shop bays up to 2 hours free. Some variants also enable motorists to top-up their parking time by paying a fee. However, free parking bays are not practical to enforce, meaning that vehicles can park with a significant amount of impunity and, therefore, they do not fit the purpose of providing a high turnover of vehicles, which would support local retail establishments.

The vast majority of these shopping parades serve a local hinterland, therefore, the trips to these shops are typically very walkable or cyclable. In addition, there is evidence that shows that those people who walk or cycle to shops spend more over the course of a year that those that drive, because they visit more often and, therefore, often purchase impulse buys.

Therefore, to encourage mode shift and to improve air quality, whilst also improving the potential income for retailers, it is proposed to remove free parking outside local shopping parades. However, implementation would only be carried out after an appropriate level of conversation and consultation takes place with traders in each location.

⁷ Manual for Streets, Department for Transport.

5.2.6 Parking Around Schools

Parking around schools is particularly problematic with the Council receiving many complaints from residents who find their drives and CPZ parking places blocked by parents picking up or dropping off their children. Worse still, many parents' cars are left on double yellow lines, and children are dropped off within the school zigzags, which create road safety issues.

From January 2019, the Council has trialled the removal of the school parking concession in Controlled Parking Zones (CPZ), that has previously allowed parents a 10-minute grace period in resident parking bays. The removal of the concession enables the Council to meet objectives in modal shift by reducing car journeys and promoting active travel and will help improve air quality near school sites, increasing active travel and reducing vehicular emissions. In addition, the 10-minute grace period was routinely flouted and caused issues with enforcement. Following successful completion of the trial, the school parking concession in CPZs was rolled out across the Borough in September 2019.

The Council will increase the use of CCTV to enforce school zig zags. This is potentially the most dangerous area for vehicles to stop, and the Council wishes to adopt a zero-tolerance policy on zig-zag stopping.

The Council launched the "Perfect Parking Campaign" in September 2017. It encourages schools to organise activities to promote safe and considerate parking. It includes a range of measures that pupils can deliver and be involved in, to raise awareness of and addressing the road safety issues relating to congestion around the school gate. At the time of writing 12 schools have signed up to the Parking Promise. Examples of projects with the campaign include:

- Working with Parking Services to identify locations for school related enforcement by CEOs, mobile cameras and CCTV
- Encourage parent drivers to pledge that they will park safely and considerately. The Council provide resources to support the campaign.
- Develop a Pupil Traffic Wardens scheme as a means of raising awareness of and addressing school related parking issues. Pupils are supported by adults (staff, PCSO or CEO) and speak to drivers if their parking causes issues.

The Council is seeking to extend this campaign to as many schools as possible in 2019/20 and beyond.

5.2.7 Connected and Autonomous Vehicles

The Council recognises that vehicle technology is moving at some pace. Many new vehicles have the ability to connect with the internet and can use these as driver aids, including in the area of parking. In addition, we are seeing trials of autonomous vehicles taking place right now on London's streets. To date, technology has been developing

quicker than legislation, meaning that there can be both benefits and concerns arising from Connected and Autonomous Vehicles (CAVs).

Without knowing how CAVs will evolve, policies and implementation is somewhat difficult. The Council will need to monitor and adapt as developments occur. Having said this, there are certain things the Council can do to assist and/or avoid certain situations depending upon whether or not they are desirable. From a parking point of view, this would be mainly based around loading/unloading of passengers at appropriate drop off locations and not within restricted areas (e.g. double yellow lines, school zig-zags etc.).

The Council is willing to work with agencies to establish a definitive set of mapping/plans of parking restrictions to enable vehicles to avoid stopping where it is inappropriate or other parking data if deemed applicable and within data sharing law (e.g. GDPR). The initial principle is that this data would be shared on an open source basis provided there is no significant cost to the Council in gathering/distributing it, otherwise the Council would seek to regain its costs.

It is also possible that the Council may need to investigate and/or implement technology to assist further advances. The Council will consider doing so or will look to partner with other organisations to do so, where it is cost effective and significant benefits can be realised. These benefits would need to be aligned with the objectives of the Transport Strategy (i.e. Mode Shift, Road Safety & Air Quality).

5.3 Electric Vehicles

5.3.1 Strategy for Implementation of EV Charging Points (On-Street)

The Council's plan for implementation is intended to deliver this policy whilst recognising the rapidly changing EV market, both in terms of demand for EV charging points (EVCPs) and the technology used.

5.3.1.1 Phase 1 Implementation – Short Term

In the short term (1-3 years), the Council needs to establish an initial network of charging points. Advice from the industry and other local authorities who have piloted schemes recently is to start in locations where there is already a demand and to ensure that charging points are interoperable (i.e. capable of accepting payment from all EV payment plans). This establishes charging points (and in the public consciousness) in locations where they are likely to be used.

There are some minor limitations to this. In order to spread the network as widely as possible, where multiple requests are made in similar locations no two sets of charging points should be within 5 minutes' walk from each other.

Following the completion of contract discussions, the Council has a commercial provider (Source London operated by Bluepoint) for fast charging points and has also partnered with Siemens/Ubitricity plus the PFI Lighting Contractor Scottish & Southern Electricity (SSE) to provide lamp column charging points. Given that the fast chargers are more straightforward to install and use, the Council's preference will be to install a dedicated EV charging bay or bays with a fast charger where possible initially. Where circumstances do not allow dedicated EV bay the network will be supplemented with lamp column chargers. The appropriate EVCPs will automatically be included in CPZ design from now on.

Rapid EVCPs will be installed where the National Grid's electrical loading limitations permit. Given these limitations, these are being planned and installed on a regional basis by TfL. It is likely that these will be based on locations at or near taxi ranks given TfL's commitment to making all taxis zero emission capable. Many of these rapid EVCPs will be available for public use.

In addition, it is expected that commercial providers will continue to install EV charging points on private land, such as petrol stations or car sales establishments.

Summary

- Initial network of chargers aligned with requests to the Council
- Source London and TfL can install fast and rapid chargers respectively
- Council implements lamp column chargers where fast or rapid chargers cannot be installed.

5.3.1.2 Phase 2 Implementation – Medium Term

In the medium term (3-7 years), the EV implementation plan will need to be flexible to cope with change within the market and what is expected to be a now rapidly increasing demand as suggested by some major manufacturers (e.g. Audi and Volvo) already signalling the end of the combustion engine by the early 2020s.

This means that the charging network is likely to need to grow exponentially. At this stage it would be important to ensure a reasonably consistent/regular network of charging points across the whole Borough on roads where there is on-street parking. This should aim to provide a charging point within around 10 minutes' walk of homes, perhaps falling to 5 minutes as demand grows, which is better than the existing petrol station network. Some streets may require additional EVCPs if demand is particularly high.

The implementation strategy will need to monitor the developments in charging and EVs and respond accordingly. It would still be expected that fast and rapid chargers would remain most popular.

Summary

- Increase the network of charging points (all varieties) to within a 10-minute walk of all on-street parking residences
- Monitor usage and double up on charging points within streets if necessary
- Monitor the evolution of technology and adapt accordingly

5.3.1.3 Phase 3 Implementation - Long term

The longer term (7 years plus) is even more difficult to predict. It is likely that the EV market will approach or potentially over take the internal combustion engine's market share. Other fuels (e.g. hydrogen) may also enter the market to a much greater extent than currently (although none of the major manufacturers are currently pushing other fuels in a significant way).

As rapid charging evolves, land use policies may need to adapt to permit larger "electric stations" to cater for demand. By this time, it is possible that new developments will be providing 100% EV charging points in parking spaces as opposed to passive provision and the Council should be monitoring pre-existing passive provisions to ensure they are converted to EV charging points.

Summary

- Monitor the evolution of technology and adapt accordingly
- Potentially approaching all on-street bays being EV points

5.3.2 Plan for Implementation of EV Charging Points (Off-Street)

5.3.2.1 Private Land and Roads

The Council will not implement EVCPs points on private land or private roads, except where the Council is the land owner and only then where the land is used primarily for car parking.

Private land owners are able to implement EVCPs on their own land provided all the relevant standards and planning requirements are adhered to.

5.3.2.2 New Developments

The new Draft London Plan 2017 has replaced the 2011 London Plan and has also updated the requirements for electric vehicle charging points. The Council's policy is to follow the London Plan standards which state:

- Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles
- All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20% of spaces should have active charging facilities, with passive provision for all remaining spaces.
- Developments should seek to reduce emissions from freight, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

5.3.3 Summary of EV Charging Point Options

The following table summarises options:

Circumstance	Charging Point Option
Off-street parking available	Owner's responsibility
No off-street parking	Apply to Council for EV charge point
Private land	Owner's responsibility
All	Commercial providers available

5.4 Car Clubs

As part of our efforts to continue to evolve our car club offering, we have identified two potential pathways for progression;

- Introduce car clubs within new residential developments
- Introduction of universal parking permits for all car club operators, which would allow for "floating car clubs"

5.4.1 Introduce Car Clubs within New Residential Developments

The first proposal seeks to develop Parking Standards specifically for the provision of car club bays within new residential developments.

Parking standards for new developments that set out the minimum number of dedicated car club bays that are provided relative to the number of units/dwellings that the site offers.

Introducing such controls would help to consolidate and expand the existing network of car club services, while targeting this intervention specifically towards new developments provides a prime opportunity from a behavioural change perspective to help lower private car ownership, as new residents moving into the site are immediately made aware that the only model of vehicle use the Council actively encourages is the shared approach through the use of car clubs.

Establishing the standards is particularly pertinent as many of the borough's key development sites are situated within high car ownership areas such as Southall, therefore the inclusion of car clubs could help offset the net rate of ownership and mitigate the potential worsening of poor air quality and congestion in comparison to the business as usual scenario and would allow a higher proportion of low and no-car developments, whilst maintaining travel options.

5.4.2 Introduction of Universal Parking Permits for all Car Club Operators

Currently more than two thirds of the borough's car club bays are within a Controlled Parking Zone (CPZ) with each company purchasing Business Permits at £800 per space annually.

In similar fashion to the proposal of introducing shared car parking bays within CPZs outlined in the most recent Transport Strategy, we propose to introduce universal parking permits for all operators to use on-street parking spaces.

We envisage that spaces would be charged using a differential emission-based pricing scheme whereby operators that use cleaner vehicles would pay a lower fee versus those that use conventional diesel and petrol vehicles. This could either be enforced per vehicle or based upon the proportion of the fleet that the type of vehicle represents i.e. operators who have a 100% EV fleet would pay a reduced permit price, versus those that have 50% conventional engines and 50% hybrid vehicles.

Introducing universal permits and managing permit's prices based upon how environmentally green the vehicles are would economically incentivise car club operators to move towards having a fully electric fleet. We anticipate that this would be a key driver in nudging our current three operators to make this switch.

Moreover, the removal of dedicated car club bays will also help to reduce the public's negative perception of car club vehicles taking up parking spaces, as vehicles will now be dispersed throughout the street instead.

As a Council we have been approached by an operator proposing a "floating car club" operation, who has expressed interest to operate in the borough. In contrast to our current operators, whereby users are not required to end their rental within the same bay they accessed the vehicle but can drop this off anywhere within a geo-fenced boundary (similar to the dockless bike sharing systems).

5.5 Freight and Loading

The issue of freight vehicles loading/unloading on-street is a growing problem, particularly as more and more households and businesses use the internet for shopping. The fastest growing vehicle sector in recent years has been goods vans. In parking terms there is also an increasing issue of vehicles which park illegally whilst they undertake deliveries. The reasons for this can be numerous – lack of loading facilities, the driver taking a risk to save time, or a misunderstanding of the parking/loading regulations. However, the potential road safety and traffic congestion issues that unregulated loading cause are the same as for passenger vehicles.

From the Council's point of view, there is a clear need to prevent dangerous loading and to ensure that loading activities do not create congestion. However, it is also recognised that many businesses require deliveries and goods to be picked up and that a total ban is not only unfeasible but could have a large negative impact on the Borough's economy. This is by no means unique to the borough but, this also means that solutions to the issue are also very difficult: there may be some solutions that work in some locations, but not in others, examples include putting loading bays in side-streets as opposed to the main road, restricting loading to outside peak periods, and using shared space (footway/loading) to avoid blocking cycle lanes or the main carriageway. These would need to be assessed on a scheme by scheme basis.

What is clear is that more information is required on loading, better engagement with both the businesses and the delivery companies to understand the requirements and how this fits with other street-side requirements. The Council should also investigate how new connected vehicle technologies could assist with loading – a delivery app, bookable loading spaces (including enforcement) and tidal flow-loading are examples of scheme that would require real time information and enforcement to work.

In the meantime, loading will continue to be enforced under the current policy.

5.6 Parking within New Developments

Parking within new developments will need to comply with the London Plan. At the time of writing this is the draft London Plan 2017, but this is expected to be adopted during the duration of this Parking Plan.

In addition to the parking standards, electric vehicle and disabled persons parking contained within the London Plan, the Council has one additional policy: that all loading should be contained within the site of a new development rather than to be placed on the existing road network. This is to avoid loading becoming a barrier to active travel (e.g. blocking current or future cycle lanes) or being a traffic management issue for the council to control or enforce.