



Streets and Walkways Sub (Planning and Transportation) Committee

INFORMATION PACK

N.B: These matters are for information and have been marked * and circulated separately. These will be taken without discussion, unless the Clerk has been informed that a Member has questions or comments prior to the start of the meeting.

Date: TUESDAY, 9 JULY 2024

Time: 1.45 pm

Venue: COMMITTEE ROOM 2 – 2ND FLOOR WEST WING, GUILDHALL

13. ***ADVERTISING BOARD UPDATE**

Report of the Executive Director of Environment.

For Information
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14. ***BANK JUNCTION IMPROVEMENTS PROJECT: NEXT STEPS FOLLOWING THE OUTCOME OF THE TRAFFIC AND TIMING REVIEW**

Report of the Interim Executive Director of Environment.

For Information
(Pages 15 - 20)

15. ***UPDATE ON ACTIONS FOR IMPROVING DOCKLESS E-BIKE HIRE IN THE CITY**

Report of the Executive Director of Environment.

For Information
(Pages 21 - 42)

16. ***DAUNTSEY HOUSE, FREDERICK'S PLACE - PUBLIC REALM IMPROVEMENTS (S278)**

Report of the Interim Executive Director of Environment.

For Information

(Pages 43 - 56)

17. ***RED BADGE HOLDER SURVEY**

Report of the Interim Executive Director of Environment.

For Information
(Pages 57 - 104)

18. ***OUTSTANDING REFERENCES**

Report of the Town Clerk.

For Information
(Pages 105 - 106)

Committee: Streets & Walkways Sub Committee	Dated: 09/07/2024
Subject: Advertising Board Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Vibrant thriving destination Diverse and Engaged Community Providing excellent services
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain’s Department?	N
Report of: Executive Director Environment	For Information
Report author: Andrea Larice, City Operations	

Summary

Advertising boards or A-boards pose safety and accessibility issues, particularly for visually and mobility-impaired individuals. The Planning & Transportation committee approved a City-wide ban in March 2020 to ensure clear and accessible pavements. However, the implementation was delayed during the COVID 19 Pandemic and to allow time for footfall to recover post-pandemic.

Not allowing A-boards to be placed on any streets improves the user experience of people walking, those with sight and mobility impairments, people wheeling prams and using mobility aids. Footfall is increasing and the working population is forecast to continue rising. The maintaining of clear and accessible pavements has particular importance to creating “inclusive environments”, which enable people to navigate their surroundings independently and safely.

Following discussions with members at the Streets & Walkways Sub Committee in May 2024, officers will start an engagement phase between July and December 2024 to communicate the A-board ban to businesses, landowners, and the community. Scheduling visits to businesses, maintaining an engagement log and communicating that A-boards are an obstruction to people walking and wheeling, and can be a trip hazard and a particular issue for people with visual impairments.

An update will be brought to this committee in January 2025 ahead of the enforcement phase commencing.

Recommendation(s)

Members of the Streets & Walkways Sub Committee are asked to note the report.

Main Report

Background

1. A-boards are usually used by shops and businesses to advertise and promote their business at pavement level. They are typically a simple stand-alone board on a heavy 'A' shape frame, which businesses place across the pavement and in the way of people, to attract their attention. Their size and type differ across a broad range of business activities.
2. Many businesses report that A-boards help generate business, which the City Corporation want to support. However, this need must be balanced against complaints, implications for planning policy and the assessment that A-boards are a highway obstruction and a trip hazard for people with mobility and visual impairments.
3. The Planning & Transportation committee approved a City wide ban of A-boards in March 2020. However, the implementation was delayed during the COVID 19 Pandemic and to allow time for footfall to recover post-pandemic.
4. A local authority wide ban on A-boards is in place in Hackney. Hackney Council introduced a borough-wide ban on A-boards in 2017 to ensure pavements remain accessible for all, particularly for people with disabilities, parents with prams, and those with visual impairments. This ban aims to reduce street clutter and maintain clear pathways.
5. Other local Authorities enforce bans on areas where footfall is high. For example, Westminster City Council has enforced a ban on A-boards on Oxford Street, Regent Street, and in Soho. Camden Council has restrictions on A-boards, especially in areas with high pedestrian traffic to maintain accessibility and reduce clutter.
6. Transport for London (TfL) actively enforces a prohibition or restriction of "A" boards on the Transport for London Road Network (TLRN, also known as Red Routes). Businesses found violating these regulations may face penalties or be required to remove their advertising boards.
7. The Royal National Institute of Blind People (2014) have been advocating for a complete ban stating that it is essential for blind and partially sighted people to have a clear route along the pavement. They note: "*The proliferation of A-boards*

can make it difficult for those with sight difficulties to negotiate the path. This can result in them walking into A-boards and injuring themselves, or inadvertently walking into the road whilst attempting to avoid these obstructions. Falling over or bumping into an A-board can be painful and can adversely affect blind and partially sighted people's confidence and mobility. The over use of A-boards can restrict their freedom and opportunity to participate in their local community."

8. Transport for all (2014) welcome a 'Zero-tolerance' on A-boards stating that it is essential for disabled people to have a clear route along the pavement. *"Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy users and older people too. Transport for All welcome this 'zero-tolerance' approach to businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle"*.
9. In October 2021 the Streets & Walkways Sub Committee approved our commitment to Transport for All's Equal Pavements Pledge. to the pledge includes *"Operate a zero-tolerance approach to street clutter. Issue warnings to businesses that obstruct pavements with A-boards, and follow up with fines."* (Transport for All , 2021)
10. Pressure on City pavements is increasing, with 24-hour footfall level now at 72% of 2019 levels.
11. Over the period of the City Plan, the GLA projections suggest that 104,000, or 14.2% more people will be working in the City of London by 2041 (City Corporation, 2023). It is imperative that we have accessible pavements that help people to navigate their surroundings independently and safely.
12. With Effect from 2 April 2024, the Pavement Licence Guidance has been updated to state that: *"Advertising boards are not included in the definition of furniture within the pavement licensing regime. As well as needing consent under the Highways Act 1980, advertising boards also require express advertising consent under the Town and Country Planning Regulations 2007."*
13. Prior to 2 April, A-boards were not expressly prohibited and there may be some licences that have A-boards within the pavement licence area. These licences expire on the 30 September 2024. This means that no business should have an A-board under their licence post 30 September 2024.

Implementation and delivery approach

14. We will take a phased approach, working towards enforcement by City Corporation Street Environment Officers.

15. Phase 1 – Project development

- Develop the appropriate process, ensuring any legal issues considered, to enforce against A-boards on public highways and develop the project plan.
- Notify committee members of the project plan, timeline for engagement and enforcement.

16. Phase 2 – Engagement with City Businesses

- Develop and disseminate key messages through various channels to ensure that all affected parties understand the new regulations and their importance.
- Engage with City Businesses and communicate why A-boards are being removed and their impact on accessibility and inclusivity.
- Identify challenges and concerns around enforcement within six months.
- Explore potential wayfinding options for businesses severely impacted by the ban.

17. Phase 3 – Enforcement

- Begin enforcement actions by City Corporation Street Environment Officers to support the creation of accessible, clutter-free pavements that enhance the user experience for everyone.

Engagement approach

18. Key Messages are being finalised for our various audiences supporting our ambitions for clear and accessible pavements for everyone. This will focus on notifying business that:

- The City Corporation are contacting businesses to remind them that A-boards cannot be placed on City of London footways and pavements.
- A-boards obstruct people walking and wheeling or using mobility aids and are a trip hazard for people with sight loss. A survey from the RNIB found that 95 per cent of blind and partially sighted people had collided with an obstacle in their local neighbourhood over a three-month period, of which 1 in 3 were injured (Royal National Institute for Blind People, 2021).
- City Corporation is working to ensure we have clear and accessible pavements support independent and safe navigation.
- City Corporation is giving businesses notice that we intend to commence enforcement in the new year.

19. We will request landowners' support us in asking their tenants to remove them to create more accessible and welcoming places in the city. There is a strong correlation between catering for greater diversity and financial performance. Becoming a disability-confident employer opens your business to a broader customer base.

20. For businesses that currently have pavement licence, which contains an advertising board, officers will still ask businesses to remove it.

Engagement timeline

21. Timeline is as follows:

Date	Activity
May – July 2024	<ul style="list-style-type: none"> • Validate committee approval and enforcement approach. • Develop communication materials (leaflets, letters) for businesses. • Target audience identification, developing a list of businesses and streets affected. • Sign-off to ensure all documents and assessments are approved.
July 2024	<ul style="list-style-type: none"> • Update report to Streets & Walkways.
July – December 2024	<ul style="list-style-type: none"> • Notify relevant partners, including the Business Improvement Districts. • Schedule engagement visits to businesses. • Repeat visits to maintain engagement logs and discuss concerns with businesses.
January - February 2025	<ul style="list-style-type: none"> • Collate feedback • Report if required
Spring 2025	<ul style="list-style-type: none"> • Begin enforcement

Corporate & Strategic Implications

22. A-board ban supports the delivery of Corporate Plan Outcome: Vibrant thriving destination, and supporting a Diverse and Engaged Community by, improving the user experience of all pedestrians including those with sight and mobility impairments. Where everyone can travel independently, safely and without restriction.

23. The City of London Transport Strategy (Our streets are accessible) sets out our approach to improving accessibility in the Square Mile. The removal of A-boards is included in Proposal 17: Keep pavements free of obstructions.

Financial implications

24. None, enforcement will be undertaken by existing staff resource.

Legal implications

25. Approval for a City-wide ban on A-boards was granted in 2020. There are further steps to ensure due process is taken ahead of any formal enforcement action, which will be established with and agreed with legal advice as necessary.

Legislation relevant to enforcement is summarised below with further details in Appendix 1.

26. **Town Police Clauses Act 1847 S28 states** that it is an offence for a person in any street, to cause an obstruction, annoyance, or danger of the residents or passengers.
27. **Traffic Management Act 2004 places** a duty on the Local Traffic Authority to manage its highway network to “secure the expeditious movement of traffic”. The Act explicitly states that “traffic” includes pedestrians. It is therefore consistent, with this duty, for the City Corporation to seek to improve the pedestrian environment on its footways and in its pedestrian zones by removing unlawful obstruction that can have a detrimental effect on the free flow of pedestrians and those with impaired mobility.
28. **Highways Act 1980:** It is an offence under Sections 137 and 148 of the Highways Act 1980 to wilfully obstruct the highway without lawful excuse, punishable by a fine not exceeding £1,000. Sections 143 and 149 give the Highway Authority powers to remove any items which have been placed on the highway.

Risk implications

29. There is a possible reputational risk to the City Corporation if the accessibility of our streets is not carefully considered. It is imperative that we have accessible pavements that help people to navigate their surroundings independently and safely.
30. There are also possible reputational risks if small to medium sized businesses do not feel supported and there are potential adverse impacts if the communication of A-board removals and enforcement are not carefully managed.

Health Implications

31. Removing A-boards may have the potential to reduce injury caused by obstruction to people who are blind or visually impaired (RNIB, 2021). And help provide a street environment that allows all people to walk or wheel around the city more comfortably.

Equality Implications

32. The Equality Act 2010 S20 (4) provides support to remove A-boards. The Act requires that where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage. The Act states that:

(2)The duty comprises the following three requirements:

(3)The first requirement is a requirement, where a provision, criterion or practice of A's puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.

(4)The second requirement is a requirement, where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.

(5)The third requirement is a requirement, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

Climate implications

33. None identified at present.

Conclusion

34. Not allowing A-boards to be placed on any streets improves the user experience of people walking, those with sight and mobility impairments, people wheeling prams and using mobility aids. Maintaining of clear and accessible pavements has particular importance ensuring “The Square Mile is accessible to all” and is central to the Transport Strategy’s Vision.

35. Officers will start engagement phase between July and December 2024 to communicate with businesses, landowners, and the community about the A-board ban. The engagement approach will be developed with the support of legal advice.

36. An update will be brought to this committee in January 2025 ahead of the enforcement phase commencing.

Appendices

- **Appendix 1: City Solicitor notes on relevant legislation**

Background Papers

- **March 2020, Advertising Aboard Policy, Planning and Transportation committee report, Agenda Item 2 (available on request)**
- **October 2021, Transport for All Equal Pavements Pledge, Streets and Walkways committee report:**
<https://democracy.cityoflondon.gov.uk/documents/s159929/TFA%20Equal%20Pavements%20Pledge.pdf>

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References

Royal National Institute for Blind People, 2014. *What can I do about - Advertising boards (A-boards)*, s.l.:
<https://committees.oldham.gov.uk/documents/s96883/RNIB%20A%20Boards.pdf>.
 Royal National Institute for Blind People, 2021. *Seeing Streets Differently*, s.l.:
https://media.rnib.org.uk/documents/Seeing_Streets_Differently_report_RNIB_2021.pdf.
 Transport for All , 2021. *Equal Pavements Pledge*, s.l.:
<https://www.transportforall.org.uk/wp-content/uploads/2023/11/Equal-Pavements-Pledge-full-A4-WITH-LOGOS.pdf>.
 Transport for all, 2014. *'Zero-tolerance' on A-boards welcomed by disabled people*, s.l.: <https://www.transportforall.org.uk/news/zero-tolerance-on-a-boards-welcomed-by-disabled-people/>.

Appendix 1: Consideration of the legal implications and legal options available for a ban of A-boards.

The following pieces of legislation are relevant for the consideration of the legal options available and ramifications of enforcing a ban of A-boards:

Town Police Clauses Act 1847 S28 states that it is an offence for a person in any street, to cause an obstruction, annoyance, or danger of the residents or passengers and will be liable to a penalty not exceeding level 3 which is £1000. There is the possibility of imprisonment up to 14 days for the contravention of this Act but that is at the discretion of the judge.

The Equality Act 2010 S20 (4) provides support for blanket ban on A-boards given the needs of disabled pedestrians. The Act requires that where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage. The Act states that:

(2)The duty comprises the following three requirements:

(3)**The first** requirement is a requirement, where a provision, criterion or practice of A's puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.

(4)**The second** requirement is a requirement, where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.

(5)**The third** requirement is a requirement, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

Reasonable steps may be taken by COL to impose a blanket ban and produce a policy setting out steps for notification of contravention and removal of the A-boards if the above criteria is met.

Traffic Management Act 2004 places a duty on the Local Traffic Authority to manage its highway network to “secure the expeditious movement of traffic”. The Act explicitly states that “traffic” includes pedestrians. It is therefore consistent, with this duty, for COL to seek to improve the pedestrian environment on its footways and in its pedestrian zones by removing unlawful obstruction that can have a detrimental effect on the free flow of pedestrians and those with impaired mobility. The Act also

includes provisions for the management of bus lanes, cycle lanes, and pedestrian areas, which are designed to improve safety and accessibility for non-motorized road users.

Highways Act 1980: It is an offence under Sections 137 and 148 of the Highways Act 1980 to wilfully obstruct the highway without lawful excuse, punishable by a fine not exceeding £1,000. Sections 143 and 149 give the Highway Authority powers to remove any items which have been placed on the highway. The boards may be removed and a fee charged for the storage and administration of collection. Liability arising from an accident involving an A-board remains with the owner of the A-board. Any damage caused to the A-board in removal would also be covered by the owner's insurance. If the bill is not paid, then an order may be obtained from the magistrates to recover the costs and to ask for a disposal order.

CPN to Prosecution

The owner may be issued with a warning or a CPN. A warning may be given requesting that the item is removed and that they will be issued with a CPN. If the board is not removed (they will be issued with a FPN of £100 or could face prosecution). If it is not removed (or the owner has already been issued with a CPN) then evidence will be taken for breaching the notice. The owner may be informed of the breach and will be given a fixed penalty notice to discharge their liability for prosecution for this offence. If the fixed penalty notice is not paid then this will be followed up with prosecution action. If the item is not removed then an application may be made to the Justice of the Peace for a seizure order under section **51 of the Anti-Social Behaviour and Crime and Policing Act 2014** which will be followed up with prosecution action within 28 days.

Town and Country Planning (Control of Advertisements) (England)

Regulations 2007: Advertisements in the form of A-Boards will result in one or more offences depending on the advertisement and nature of the location concerned. A-Boards are not excluded by Schedule 1 (exempt advertisements) or able to be subject to deemed consent under Schedule 3 of the 2007 Regulations, as such they require express consent before being allowed to be displayed.

Clean Neighbourhood and Environment Act 2005: Section 43, enables the Council, to serve a Fixed Penalty Notice where advertisements have been deemed to be displayed unlawfully (same approach is utilised to deal with fly posters).

Section 224, Town & Country Planning Act 1990 makes it an offence for any person to display an advertisement contrary to the 2007 Regulations. In the absence of any offence being able to be resolved through the Fixed Penalty Notice, legal action could be taken under the following: i. The maximum penalty under this section is £2,500, and in the case of a continuing offence a further fine of up to one-tenth for each day the offence continues after conviction.

Section 225, Town & Country Planning Act 1990 enables the Council using a Notice, to recover any costs incurred with the obliteration/removal of any advertisements displayed contrary to the Town & Country Planning (Control of Advertisements) (England) Regulations 2007.

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Committee(s): Streets And Walkways Sub Committee – For Information	Dated: 09/07/2024
Subject: Bank Junction Improvements Project: Next steps following the outcome of the Traffic and Timing Review	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Vibrant Thriving Destination, Flourishing Public Spaces
Does this proposal require extra revenue and/or capital spending?	Y
If so, how much?	£ TBC
What is the source of Funding?	Capital Bid for OSPR in next round
Has this Funding Source been agreed with the Chamberlain’s Department?	N
Report of: Interim Executive Director Environment	For Information
Report author: Gillian Howard Policy and Projects, City Operations, Environment.	

Summary

The Court of Common Council decided on 20 June 2024 to “pursue a change to the restrictions [at Bank junction], under an experimental traffic order, to allow taxi access at all times while continuing to restrict other traffic, including private hire vehicles and powered two wheelers, between 7am-7pm Monday to Friday, except for access to Cornhill from Princes Street. (This is subject to further modelling, design work and approvals)”

This paper sets out the indicative timetable for this work to be undertaken as included in the appendices of the June 2024 Court of Common Council paper.

Recommendation(s)

Members are asked to:

- Note the report.
- Note the indicative timetable and next steps as set out in Appendix 1 of this paper.

Main Report

Background

1. The traffic mix and timing review for restrictions at Bank Junction has concluded. A new phase of the project to deliver the Court Of Common Council's decision to pursue an experimental change to Bank to allow taxi access is being progressed.

Current Position

2. The indicative timeline and outline tasks can be found in Appendix 1 of this report.
3. Further funding will be required to Implement the Experimental Traffic Order, as previously set out. Costs are being finalised and a bid for funds from the On Street Parking Reserve will be submitted for consideration by Priorities Board, Resource Allocation Sub Committee and Policy and Resources in due course.

Options

4. The next stage of work will identify the practical options of allowing taxis through Bank, and a Gateway 3-4 report (options appraisal) will be submitted in November 2024 for Members decision.
5. It is at this stage that a final option for which arms of the junction taxis are allowed to use will be recommended. This will be informed by the next phase of traffic modelling which will identify the potential journey time benefits and impacts of making changes. The next phase of traffic modelling is currently being commissioned with the consultant and TfL.

Proposals

6. To note the indicative time frame and steps in Appendix 1 with a view to an experimental traffic order being operational in Spring 2025.

Key Data

7. N/A

Corporate & Strategic Implications

Financial implications

8. A bid for further funding to implement the changes of an experimental order, monitor, enforce, consult and report back whether the experiment has been successful is going to be required. These costs are currently being finalised ready to submit a bid for funding at the next available round.

Resource implications

9. As set out in the May report there is a need for more internal resource than is currently available to deliver the experiment and continue all current workload commitments. Consideration as to how this is managed, for example by reprioritising other work or through additional consultancy support is taking place. Additional resource may be required within the parking enforcement team to implement and manage the change to the enforcement of the restrictions for the experiment. Discussions as to what might be required is taking place.
10. It should also be noted that progressing the traffic modelling work with TfL requires them to have sufficient staff resource to undertake their assessment and audits. They are aware of the outcome of the Court of Common Council decision and meetings with the relevant teams are being set up to agree the work programme. The capacity of the traffic modelling consultant would also be required. The commissioning process for this is currently taking place.

Legal implications

11. No implications for consideration in this update report

Risk implications

12. £150,000 of costed risk has been allocated to cover potential costs associated with a legal challenge.
13. There remains a risk that TfL do not agree to the TMAN application when submitted. This would be mitigated by pursuing an experimental scheme with defined outcomes and agreed monitoring strategy and continuing to work closely with TfL throughout the development of the proposals.

Equalities implications

14. A further Equalities analysis for the experiment will be undertaken in due course.

Climate implications

15. N/A

Security implications

16. N/A

Conclusion

17. Note the contents of this report and the indicative timeline and next steps in Appendix 1

Appendices

- Appendix 1 – Indicative timeline and next steps for the experiment.

Background Papers

Court of Common Council paper 20 June 2024

[Agenda item - Bank Junction Improvements \(All Change at Bank\) - Modern Council \(cityoflondon.gov.uk\)](https://www.cityoflondon.gov.uk/Agenda/Agenda-Item/2024/06/20/2024-06-20-001)

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Appendix 1

Indicative timeline and next steps to implement an Experimental Traffic Order at Bank Junction.

Date	Action/task
June 2024	<p>Court of Common Council decides that a change to the traffic restrictions at Bank is required.</p> <p>This will start the detailed design process for a change to the traffic orders.</p>
June/July 2024	<p>Officers undertake the relevant commissions to continue the traffic modelling process to the next stage and agree programme with TfL.</p>
June to November 2024	<p>City and TfL continue working together on the Base and Future Base traffic modelling submissions and audits.</p> <p>Consultants run scenario tests for consideration setting out likely implications for traffic signal timing, journey time impacts and benefits of different routing options.</p> <p>Engagement with local stakeholders on the progress of the scenarios and likely recommendations to committee with any feedback incorporated into the committee report</p>
November 2024	<p>Progress report to Streets and Walkways Sub Committee for consideration of the scenarios tested and a decision on the preferred routing for the restrictions to be 'relaxed'. This routing will then be progressed through the last stages of traffic modelling approvals.</p>
November 2024 to January 2025	<p>Submission of the proposed traffic model for TfL audit and sign off.</p> <p>Discussion of agreeable success criteria and likely monitoring strategy for the traffic experiment between the City and TfL.</p> <p>Continued engagement with local stakeholders</p>

January 2025	Streets and Walkways consider final 'design' (what changes to the traffic signal timings would need to be undertaken, likely impact on journey times, updated Equalities analysis and the success criteria and monitoring strategy etc.) and authority to progress to the implementation of the experiment (subject to the successful sign off from TfL)
February 2025	TfL prepare internal Scheme impact assessment Report for final sign off of the Traffic Modelling process.
March 2025	If required, scheme presented at TfL Roads Space Performance Group (RSPG) ahead of City formally submitting its Traffic management (TMAN) application.
April to May 2025	Lead up to the experiment going live, new signage ordered, Traffic Order notice processed, stakeholder engagement and communications campaign launched.
May 2025	<p>Experimental scheme goes live.</p> <p>Monitoring and statutory and public consultation begins.</p> <p>The experiment will run for up to 18 months before a final decision is taken based on meeting the success criteria and consideration of the monitoring information.</p>

Committee: Streets & Walkways Sub Committee	Dated: 9 July 2024
Subject: Update on actions for improving dockless e-bike hire in the City	PUBLIC
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Vibrant thriving destination
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain’s Department?	Y/N
Report of: Executive Director Environment	For Information
Report author: Giacomo Vecia, Senior Strategic Transportation Officer	

Summary

This report provides an update on actions agreed at this Committee in January 2024 for improving dockless cycle hire operations in Square Mile. The actions required immediate operational changes from Lime and Forest to improve their schemes and in particular parking compliance across the City.

Several agreed actions have been undertaken, including clarifying our requirements with operators in writing, updating internal and external resources on reporting inappropriately-parked dockless bikes, ensuring operators are enforcing against poor user behaviours and finalising our micromobility-related studies. Other actions are ongoing, including delivering new dockless vehicle parking bays and working with operators to improve their warning, fining and banning procedures.

Recommendation(s)

Members of the Streets and Walkways Sub Committee are asked to note the content of the report.

Main Report

Background

1. Micromobility is a term that refers to modes of transport using lightweight and low speed vehicles such as bicycles or scooters, especially electric ones, that may be hired for short-term use. This includes dockless cycle hire and rental e-scooters.
2. The fact that no on-street docking infrastructure is required for dockless cycle hire and rental e-scooters offers users more flexibility and avoids the risk of not

being able to end a ride due to a docking station being full. It also represents a challenge, as users of dockless cycle hire can leave bikes anywhere, potentially obstructing pavements.

3. While rental e-scooter schemes are, on a trial basis, regulated by the Department for Transport and Local Highways Authorities, dockless cycle hire schemes fall outside the existing legislative framework. The City Corporation does not have powers to prevent dockless cycle hire schemes from operating in the City. A summary of our legal powers relating to dockless cycles is provided in Appendix 1.
4. We have agreed that two dockless cycle hire operators – Lime and Forest – can operate in the City with our approval. As noted above, the City does not have powers to prevent dockless cycle hire schemes from operating in the City. We have given this approval despite the legal limitations to improve engagement with Lime and Forest and seek additional voluntary financial contributions from them to support micromobility in the City.
5. Since their approval statuses were first granted in 2020, Lime and Forest dockless bikes have been used for an estimated two million trips by City residents, workers and visitors and demand continues to grow. It is estimated that on average over 100,000 journeys are now made by dockless bikes in the City every month. This has contributed to both the increase in cycling observed in the City over the last three years and to challenges around parking supply and inappropriately parked dockless bikes on City streets.
6. We are working with Lime and Forest to ensure that best practice and innovation introduced by one operator is adopted by the other. We are also working closely with TfL and other London boroughs who have agreement with Lime, Forest or other dockless cycle hire scheme operators active in London to ensure industry best practice is adopted in the City.
7. In January 2024, Members agreed a series of actions relating to improving parking compliance, including: introducing a City-wide no parking zone (among other scheme improvements); expanding our data collection and reporting over the short term; increasing the number of dockless vehicle parking locations in the medium term; and, over the longer term, facilitate ongoing collaboration with TfL, London Councils and central Government to support and champion additional regulatory, contractual and other powers to better manage dockless operations and operators.
8. An update on progress with implementing the immediate and short-term actions is provided below.
9. As dockless cycle hire schemes fall outside the existing legislative framework and the City Corporation does not have powers to prevent dockless cycle hire schemes from operating in the City (as outlined in Appendix 1), many agreed actions were dependent on compliance by operators.
10. In June 2023, London Council's Transport and Environment Committee agreed in principle to a single contract approach for e-bikes and e-scooters and to work

with TfL and London local authorities on the design of the scheme, with the hopes of enabling a transition to a single contract in 2025.

11. In May 2024, Members agreed to signal our intention to join the proposed contract, should it be brought forward. Further details of this approach can be found under Background Papers
12. In advance of this contract coming into effect and/or the Government introducing planned legislation, individual agreements with operators remain the most effective mechanism for managing dockless cycle hire in the City.
13. Our cleansing arrangements, including how Street Enforcement Officers report dockless bikes to operators, remains in effect. Full details on our existing cleansing and enforcement arrangements can be found in Appendix 2.

Update on immediate actions to be implemented in early 2024

14. The following immediate actions were outlined in the January 2024 report:
 - a. A City-wide no-parking zone outside of approved parking areas
 - b. Rapid response locations
 - c. Review warning, fining and banning procedures
15. In addition to the above, as previously agreed in July 2023, dockless bikes were allowed to be parked at pre-approved and under-utilised Sheffield stands and cycle parking areas on a temporary basis while additional dedicated dockless parking areas are identified.
16. It was noted that it may take time for compliance to improve following the implementation of these actions and that there may be complaints for hire scheme users as behaviours and habits adjust.
17. Officers have met with and written to both Lime and Forest this spring to communicate the City's requirements, including the implementation of a City-wide no-parking zone except for approved parking areas. In their written responses, both operators confirmed that they have implemented a City-wide no-parking zone and issue warnings and penalties to anyone who parks outside of approved areas, including bans for repeat offenders.
18. Both operators also stated they were unable to meet the requirement that they cap their fleet size in the City at 150 vehicles each. Officers wrote back to both Lime and Forest to express our disappointment at this and reiterate the need for operators to manage their fleets in line with available parking capacity.
19. Officers have developed a map of priority response areas in the City where any e-bike left outside of approved parking areas would always be obstructive, irrespective of how the e-bike is parked. Users leaving bikes in these areas would automatically receive a higher fine and bikes would be prioritised for removal by the operators.
20. This map was developed by overlaying streets where pavement widths are less than 2m, sensitive areas such as St. Paul's Cathedral, areas where bikes are not permitted to be ridden such as the Barbican Highwalks and Podium, and

other areas requested by external partners such as the City of London Police or Transport for London. The final priority areas map is included in Appendix 3.

21. We have written to operators to inform them of these priority response areas. We are awaiting confirmation from both operators on implementation and note that operators already include some of these areas in their enhanced fining areas, such as the Barbican podium.
22. We are also working with operators by suggesting changes to existing penalty structures and procedures to improve user behaviours and parking compliance in the City, in particular as they relate to our new priority areas.

Update on short term actions to be implemented by mid-2024

23. The following short-term actions were outlined in the January 2024 report:
 - a. New dockless vehicle parking spaces
 - b. Audit kerbside space availability and parking occupancy
 - c. Member walkabouts and information gathering
 - d. Dedicated dockless webpage
 - e. Additional data collection and reporting
 - f. Cycle and e-scooter campaigns

Update on the kerbside review and provision of new dockless vehicle parking spaces

24. In March 2024, a kerbside review was carried out to identify potential spaces for micromobility parking. This study assessed over 200 kerbside locations that are free from parking and loading restrictions and outside of the rental e-scooter's no-go zones.
25. The review of 200 locations identified 75 streets which may be suitable for installing a new parking bay. All other locations were considered not suitable due to competing street user demands. The 75 locations were overlaid with areas of high cycle hire demand to prioritise sites for new parking bays. See Appendix 4 for further details.
26. 26 locations have been shortlisted for the next batch of parking bays to be delivered this financial year. See Appendix 5 for further details. Each bay will have a minimum of 12 bike or 20 scooter spaces.
27. The estimated cost for delivering these 26 parking bays is £125,000. A funding bid for this amount has been submitted to TfL with the outcome expected by August 2024. If this is unsuccessful or the full bid amount is not received, then we will seek contributions from operators to deliver these bays.
28. It should be noted that additional spaces are also being considered and where possible delivered as part of projects. For example, the Finsbury Circus Access Improvements project includes three large bays (equivalent to 7 standard bays) and will provide space for at least 82 rental bikes or 143 scooters.

29. The entire micromobility parking programme aims to deliver up to 75 parking bays by December 2026, subject to funding being provided by either operators or TfL.
30. New dockless vehicle parking bays can be implemented under existing delegated powers.

Update on the Cycle Parking Occupancy Review

31. In February 2024, a cycle parking occupancy survey was carried out to audit the current infrastructure and occupancy of the cycle parking locations. The survey aimed to identify opportunities where underutilised cycle racks could be reallocated could be reallocated for dockless cycle hire parking.
32. Officers consider cycle parking locations with at least six cycle racks (12 spaces) and a parking occupancy of 20% or less could be suitable for reallocating 50% of the spaces to dockless cycle hire. This approach aims to provide a minimum of six spaces each for private bicycles and dockless cycle hire, ensuring a balance between the two parking types and potentially improving the regulation of dockless cycle hire parking in the area. The 20% parking occupancy threshold accounts for increases in private bicycle parking demand during the summer.
33. For instance, if a location had 10 cycle racks (20 spaces) and had a 20% occupancy (4 bicycles parked), the reallocation of 5 cycle racks (10 spaces) for dockless cycle hire would be considered.
34. The survey identified eight locations that meet these criteria. Officers have assessed these locations and now propose reallocating parking spaces for dockless cycle hire at five of these locations which would provide additional parking for up to 54 dockless cycle hire bicycles. Details of the locations are shown in Appendix 6.

Dockless bike scheme monitoring and data collection

35. Operators periodically share operational and compliance data with Officers as part of ongoing monitoring and evaluation of their schemes. The quality and extent of this data sharing has varied over time. Officers have continued to request extensive data on scheme operations and parking compliance, including on compliance rates, number of penalties issued, number of retrieval tasks initiated as a result of obstructive dockless vehicle parking or abandonment, and number of retrieval tasks completed.
36. Officers wrote to Lime and Forest requesting a data transfer in May and June 2024. No operator responses were received at time of writing. We will continue to write to operators to insist they provide this data to us.
37. City Officers undertake periodic bay occupancy audits to understand parking compliance and activity levels in and around our approved parking areas. Beyond this, at present there are limited cost- and resource-efficient methods available to verify or audit data shared with us by operators.

38. On 18 June 2024, an informal audit of our dockless vehicle parking bays was conducted between 13:00 and 16:00. Out of 16 carriageway bays audited, eight were found to be over-capacity, with some bays overcapacity by 30-60 bikes. Several under-capacity bays had no e-bikes recorded in them, suggesting the location of these bays may be poor or in low-demand areas. Relocation of some bays may improve their usage over time.
39. Officers will continue to undertake periodic sampling to capture numbers of both inappropriately and appropriately parked bikes in small areas. This data may allow us limited ability to verify and audit operator data on percentages of dockless bike journeys that end with a bike appropriately or inappropriately parked, noting that data collected in this way is unable to account for bikes that are moved after a journey is ended. Spot checks will also be undertaken to audit operator response times for removal of e-bikes causing an obstruction, particularly in our new priority areas.
40. Officers will begin undertaking “mystery shopper” rides where e-bike hire rides are ended outside of bays to check warning and fining procedures are being applied. Officers will also periodically request anonymised warning and fining information on specific bikes through providing operators with serial numbers of inappropriately parked or abandoned bikes.
41. London Councils and Transport for London are working to expand existing data sharing platforms, including PowerBI dashboards and the BlueSystems tool in use for the rental e-scooter trial, to better incorporate dockless bike data. However, without powers to compel operators to share this data there has been limited success in incorporating auditable data sources into these platforms.
42. Data auditing and verification is likely to improve considerably once the joint dockless micromobility contract is live. These challenges and issues do not exist for rental e-scooter data that is already shared and managed through the BlueSystems platform.
43. City Officers will continue to work with London Councils, Transport for London and dockless operators to improve data sharing agreements and will seek to find alternative, cost- and resource-effective ways to better audit and verify the data that operators share with us.
44. City Officers will update Members of this Committee on an annual basis as part of Transport Strategy annual reporting to share the data that we receive from operators and that we collect internally as part of our cleansing and enforcement procedures.

Update on other short term actions

45. A dedicated City of London dockless e-bike webpage launched this spring (<https://www.cityoflondon.gov.uk/services/streets/dockless-cycle-hire-in-the-city-of-london>). The webpage includes extensive information on micromobility regulations, reporting procedures, what enforcement powers are and aren't available to the City Corporation and general Q&As on dockless e-bikes and e-scooters.

46. Officers have developed standardised complaint responses procedures to help improve response timeframes to Members and members of the public.
47. We are continuing to work with operators to formalise our requirements and operational relationship. Given any potential pan-London non-docked micromobility scheme is not set to launch before 2025, we are exploring the use of Memorandums of Understanding (MoUs) as an interim solution.
48. Targeted social media posts were also undertaken during bike week to help raise awareness of appropriate riding and parking behaviours. A further cycle roadshow is planned for 27th June during Climate Action Week and will include training and messaging around appropriate behaviour.

Central government micromobility legislation

49. The Government has stated its plans to introduce controls to enable the regulation of the dockless rental market. This would extend to rental bikes and e-bikes as well as e-scooters. The timetable for the legislative process as not yet been confirmed and no relevant legislation was included in the King's Speech in Autumn 2023.
50. As discussed at the last meeting of this Committee the Policy Chairman has written to the Secretary of State for Transport to highlight our concerns around the delay to this legislation.
51. City Corporation Officers will continue to work with TfL, London Councils and operators to support and champion for primary legislation focussed on micromobility providing regulatory and other powers for local authorities to manage dockless vehicle schemes following the upcoming General Election.

Corporate & Strategic Implications

52. Dockless cycle hire supports the delivery of Corporate Plan Outcome: Vibrant thriving destination.
53. The City of London Transport Strategy (Proposal 28) sets out our approach to improving cycle hire in the Square Mile. The need for designated parking areas is also included in Proposal 17: Keep pavements free of obstructions.
54. Micromobility schemes including dockless cycle hire helps inform the Future City Streets Programme (Proposal 42).
55. Dockless cycle hire also supports our Climate Action Strategy through providing a potentially zero emission alternative to short car, private hire and taxi trips.
56. There is a possible reputational risk to the City Corporation if innovative approaches to increasing sustainable and healthy transport modes are not carefully considered. There are also possible reputational risks if potential adverse impacts of dockless cycle hire operations are not carefully managed.

Legal implications

57. Dockless cycle hire schemes which do not necessitate any infrastructure being placed on the highway fall outside the existing legislative framework and do not need the City Corporation's consent to operate in the City, as outlined in Appendix 1.
58. In the event of loss, injury or damage being caused by dockless cycles, the person responsible would depend on the circumstances of each case. For example, if a cycle had remained in a dangerous position for days without the highway authority taking steps despite complaints, some liability would be likely to rest with the highway authority. If an accident occurred a few moments after the cycle was left in a dangerous position and the highway authority had no reasonable opportunity to identify and remedy the danger, it is unlikely any liability would rest with the highway authority, and therefore would be more likely to rest with the user and/or operator.
59. The steps proposed to secure the co-operation of operators in ensuring safe practices would help demonstrate that the City is taking reasonable measures consistent with its responsibilities outlined in Appendix 1.
60. Data collected from dockless cycle hire operations will also help inform Corporation policy and possible representations on and consultations to future legislation to regulate the dockless hire market.
61. The signing of any Memorandums of Understanding (MoUs) with active operators in the City will include favourable break clauses so as to not compromise our ability to join any potential future pan-London non-docked micromobility scheme or contract.
62. Any MoU will not hold sufficient legal status to provide the City Corporation with additional regulatory or enforcement-related powers.

Financial implications

63. Operators covered the costs of the studies referenced in Paragraphs 24-34, which will help identify additional parking areas for delivery and appropriate Sheffield stands for interim use ahead of new parking bay implementation.
64. We are now seeking additional contributions to cover the costs of proposed new dockless vehicle bays. Bays that are currently being delivered are funded through existing e-scooter trial income.
65. Additional costs will be incurred if the City Corporation must relocate or remove dockless bikes deemed to be causing a danger from the streets in default of the operator removing them. Removal and storage costs would be incurred in these circumstances and will be recovered through charging operators for removal.
66. There will be some additional impact on cleansing teams as in some locations when dockless parking areas are full it is more difficult for cleansing team to access the area. This is an issue for any vehicle parked areas if occupied whilst cleansing operatives are carrying out work. Further details are included in Appendix 2.

Health Implications

67. Well managed dockless cycle hire schemes have the potential to reduce the number of car journeys within central London, and potentially shift journeys from short car, taxi, private hire and public transport trips, with associated benefits to air quality and public health.

Equality Implications

68. A detailed Equalities Impact Assessment has been undertaken in consultation with internal and external stakeholders on a similar scheme – the City of London’s rental e-scooter trial. Lessons and mitigations from that EqIA have been taken into consideration wherever appropriate and related to dockless cycle hire.

69. Dockless cycle hire activity in the City is being monitored to understand impacts on protected characteristic groups (e.g. visually impaired, wheelchair users). This is consistent with the public sector equality duty.

70. The City of London rental e-scooter trial EQIA identifies a number of issues, particularly around safety of e-scooter users and other road users, which can help better understand and develop mitigations for dockless cycle hire schemes, including:

- Speeding and irresponsible riding behaviours
- Irresponsible parking leading to dockless cycles being abandoned and becoming street litter that could causing obstructions or injury
- Increased fears for people’s safety and wellbeing on the City’s Streets
- Increased risk of collisions for those riding dockless cycles
- Increased risk to people walking on our streets, due to dockless cycles not being seen or heard, dockless cycles speeding in shared use areas, and/or illegal or poor rider behaviour

71. Engagement and enforcement against illegal and unsafe use of dockless cycles will be undertaken in partnership with City of London Police.

72. In summary, we have concluded that the application of mitigation measures and the benefits from safe use of a dockless cycles outweigh the negative impacts, or potential impacts of those in protected characteristics groups.

Conclusion

73. The progress outlined in this report is part of our ongoing efforts to improve parking compliance and scheme operations across the Square Mile. We will continue to make progress on agreed actions with a focus on improving parking compliance and delivering new dockless vehicle spaces as outlined in Paragraphs 24-30.

74. The delivery of up to 26 new dockless vehicle parking bays this financial year (and up to 75 bays over the next 3 years) will help us meet the rising demand for dockless vehicles in the City while minimising the obstructions and visual clutter dockless e-bikes can cause.

75. Officers will continue to monitor Lime and Forest's performance in the City and work with both operators and TfL/London Councils to improve data collection, sharing, analysis and verification across all dockless modes.
76. While the situation is not perfect at present, this approach continues our formal relationships with operators, allowing us to continue to work constructively with them to raise issues and discuss potential solutions while recouping some of the costs associated with mitigating the impacts of dockless cycle hire in the City. Not working with operators would likely also lead to a free-for-all environment.
77. The City Corporation is also seen as an important dockless vehicle policy knowledge base both within London and nationally. Continuing our engagement with operators in London and the dockless industry more widely will help us maintain and elevate that status and the leverage it affords the City Corporation in influencing wider policy and legislation.
78. We will continue to bring updates to this Committee on dockless scheme operational performance in the City on an annual basis as part of the Transport Strategy Annual Report.
79. An additional report will be brought to this Committee ahead of the finalisation or signing of any potential pan-London non-docked micromobility scheme contract documents.

Background Papers

- Private - Non-docked micromobility scheme Statement of Intent – 14 May 2024
- [General micromobility update and actions for improving dockless bike hire in the City - 30 January 2024](#)
- [Extended Review of Dockless Operator Lime - 4 July 2023](#)
- [Dockless cycles policy and legal powers update - 17 January 2023](#)
- [London rental e-scooter trial and dockless vehicle update - 19 July 2022](#)
- [Dockless cycle hire trial outcomes and next steps - 12 December 2019](#)

Appendices

- Appendix 1 – Legal implications: advice from the Comptroller and City Solicitor
- Appendix 2 – Existing cleansing and enforcement arrangements
- Appendix 3 – Dockless vehicle priority removal areas
- Appendix 4 – Prioritised parking
- Appendix 5 – Cycle rack reallocation
- Appendix 6 – Shortlisted parking

Giacomo Vecia

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Appendix 1 – Legal implications: advice from the Comptroller and City Solicitor

Statutory duties

The City Corporation has a duty under s.130 of the HA 1980 to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority.

It also has a network management duty under s.16 of the Traffic Management Act 2004. This requires it to manage its road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives:

- a. securing the expeditious movement of traffic on the authority's road network;and
- b. facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.

Under section 122 of the Road Traffic Regulation Act 1984 local authorities are under a duty to exercise functions conferred on them under that Act so far as practicable, having regard to matters specified in subsection (2), to secure the expeditious, safe and convenient movement of traffic (including pedestrians).

The City Corporation is also subject to the public sector equality duty under section 149 of the Equalities Act 2010. This means that in the exercise of its functions it must have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This includes removing or minimising disadvantages suffered by people due to their protected characteristics (such as visual or mobility disabilities).

An unmanaged proliferation of bikes on the highway arising from dockless bike hire schemes may compromise compliance with the above statutory duties.

Statutory powers to deal with bikes on highway

Dockless cycle hire schemes which do not necessitate any infrastructure being placed on the highway fall outside the existing legislative framework and do not need the City Corporation's consent to operate in the City. However, there are some existing statutory powers available where bikes are left so as to cause an obstruction, nuisance or danger.

1. Section 137 HA 1980 – If a person, without lawful authority or excuse, in anyway wilfully obstructs the free passage along a highway he is guilty of an offence and liable to a fine not exceeding Level 3 on the standard scale (currently up to £1000.00.)
2. Section 148(c) HA 1980– if, without lawful authority or excuse a person deposits anything whatsoever on a highway to the interruption of any user of

the highway he is guilty of an offence and liable to a fine not exceeding Level 3 on the standard scale.

3. Section 149 HA 1980 – if anything is so deposited on a highway as to constitute a nuisance, the highway authority for the highway may by notice require the person who deposited there to remove it forthwith. In the event of non-compliance, a court order may be obtained authorising the removal and disposal of the offending item. If the highway authority has reasonable grounds for considering the item constitutes a danger (including a danger caused by obstructing the view) to users of the highway and ought to be removed without the delay of seeking a court order it can remove the item forthwith and, ultimately, seek a court order for its disposal.

A highway nuisance can be defined as ‘any wrongful act or omission upon or near a highway, whereby the public are prevented from freely, safely and conveniently passing along the highway’. So it is something that causes an interference with the public right of way along a highway.

Obstructions are defined in TfL’s ‘Dockless Bike Share Code Of Practice For Operators In London 2018’ as *a situation arising from the deposit of a bike or bikes (whether by reason of its or their position, their number, or otherwise) so as to adversely affect the free use of a highway (including a footway or a carriageway), or adversely affect the free use of any other public or private land (including river, canal and park environments which is not specifically assigned for the purposes of dockless bikes, without lawful authority or excuse*. (This is not a legal definition but it provides a useful guide).

What constitutes a danger will need to be considered on the facts of each situation but a number of dockless vehicles left fallen across a footway so as to cause a trip hazard may be considered to be a danger. Where a substantial part of the footway is blocked that may also constitute a danger if pedestrians could be forced into the street. Location specific reasons may also be a factor as to whether left vehicles are a danger such as the width of the footpath and the level of footfall.

Street trading and ‘waste’

Consideration has been given to whether the provision of dockless cycles for hire is caught by local legislation which makes it unlawful for any person to engage in unauthorised street trading in the City. “Street trading” is defined in the City of London (Various Powers) Act 1987 to mean the selling or exposing or offering for sale of any article or thing in a street. However, dockless cycle hire schemes involve bikes being available on the highway (or on private land with the consent of the owner) for temporary hire by members of the public, with payment being made via an App, and no person in the street engaged in the hiring out of the bikes. As the 1987 Act prohibits a person from selling etc. items in the street, not the temporary hiring of bikes in the way proposed which is more in the nature of a service (and not dissimilar to the existing Santander cycle hire scheme except that there are no docking stations), the activity would not amount to unauthorised street trading.

Consideration has been given to whether definitions of “waste” or “litter” in legislation apply. It is considered that these terms are not intended to cover bicycles left temporarily on the highway and which are in use for the benefit of the operators and their customers and officers are not aware of any decisions on this point. It is not considered that this adds significantly to the City’s statutory powers to deal with bikes on the highway.

Regulation by making byelaws

Government guidance states that byelaws are considered measures of last resort after a local council has tried to address the local issue the byelaw applies to through other means. A byelaw cannot be made where alternative legislative measures already exist that could be used to address the problem. Byelaws should always be proportionate and reasonable.

It follows that there is a risk that the case for making a byelaw to regulate dockless bike hire could be undermined if all bikes on City streets were to be classed as obstructions and removed under existing powers.

It is understood that action proposed to establish a regulatory framework for dockless vehicle schemes by way of a London-wide byelaw has been deferred as the Government has indicated that it intends to introduce controls to regulate the market. These regulations have been pushed back to at the earliest the next parliamentary session in 2023.

Liabilities

In the event of loss, injury or damage being caused by the cycles, the person responsible would depend on the circumstances of each case. For example, if a cycle had remained in a dangerous position for days without the highway authority taking steps despite complaints, some liability would be likely to rest with the highway authority. If an accident occurred a few moments after the cycle was left in a dangerous position and the highway authority had no reasonable opportunity to identify and remedy the danger, it is unlikely any liability would rest with the highway authority, and therefore would be more likely to rest with the user and/or operator. In addition, the steps proposed to secure the co-operation of operators in ensuring safe practises would help demonstrate that the City is taking reasonable measures consistent with its responsibilities.

Appendix 2 – Existing cleansing and enforcement arrangements

Our current approach to enforcing against inappropriately parked dockless bikes consists of reporting issues and incidents directly to operators and, if possible, immediately moving or relocating bikes to more appropriate locations. We do not currently undertake significant legal enforcement action against dockless cycle hire schemes.

While City Corporation staff are unable to unlock dockless cycles to relocate them to approved parking areas, they will attempt to lift bikes (which can weigh up to 20kg) while they are locked to move them to more appropriate nearby locations. The relocation is limited to the nearest safe location, as bikes are heavy and locked, needing two people to move them. These bikes are then reported immediately to the responsible operator to attend to.

The City Corporation has limited powers to enforce against dockless cycles that pose nuisances, obstructions or dangers on City streets. Enforcing against dockless cycles that pose an obstruction involves notifying operators of any obstructions and providing them a reasonable timeframe for removing the obstruction. If the obstruction is not removed in a reasonable timeframe the City Corporation can seek a court order to enable us to remove the obstruction ourselves.

Any dockless cycles that pose a danger on our streets may be removed immediately. While no standard definition of how dockless cycles may constitute a danger on UK highways exists, potential scenarios have been identified as part of legal advice sought out regarding this.

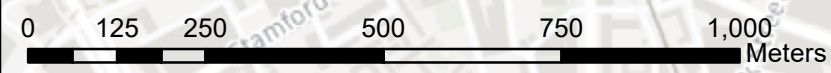
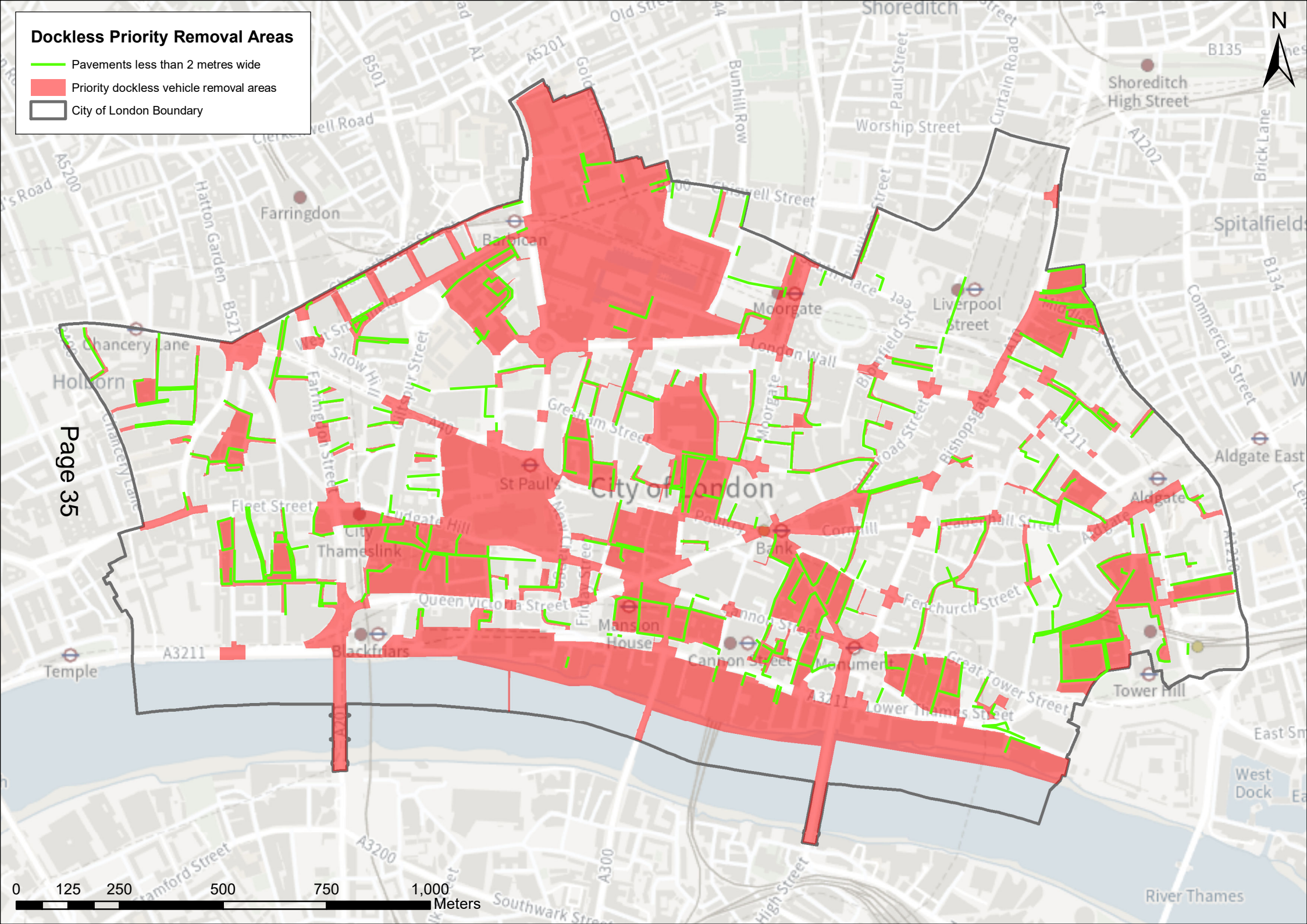
Officers have not regularly enforced against bikes that pose a danger due to:

- a. Limited secure storage for removed bikes due to changes at Walbrook Wharf
- b. Updated costs associated with enabling the IDOX cleansing system to facilitate dockless cycles removals
- c. Limited cleansing staff resource
- d. A lack of formal legal and policy guidance on how to appraise whether an inappropriately parked dockless bike constitutes a danger or an obstruction
- e. Concerns around legal challenges should operators wish to challenge our definition of dangerously parked dockless bikes
- f. Awareness that most bikes are re-hired or removed before City cleansing staff are able to attend to sites with inappropriately parked bikes with the necessary removal vehicle and teams

City staff will continue to report inappropriately parked bikes to operators, move those bikes when possible and work with operators to improve their compliance and response times.

Dockless Priority Removal Areas

- Pavements less than 2 metres wide
- Priority dockless vehicle removal areas
- City of London Boundary



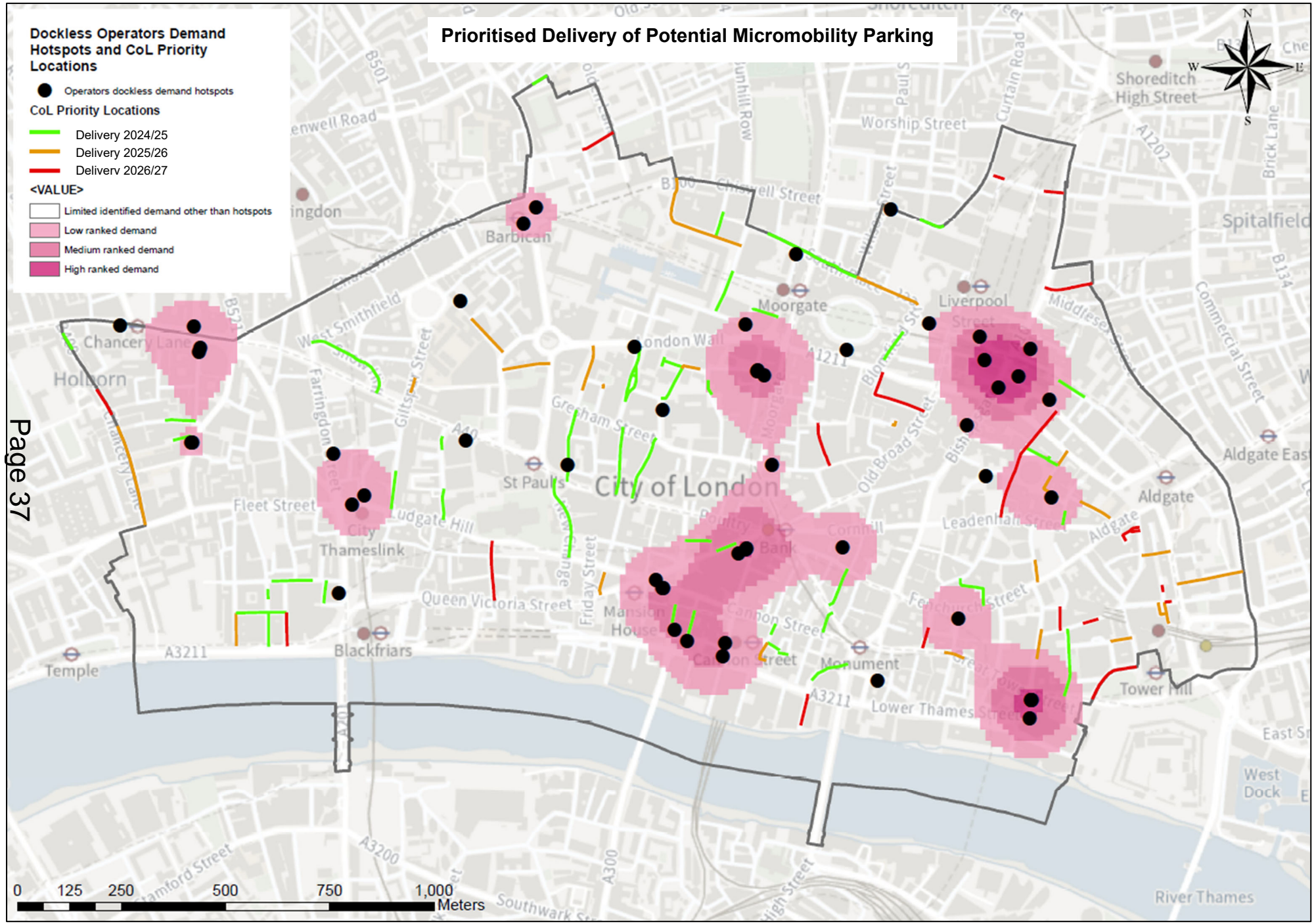
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Prioritised Delivery of Potential Micromobility Parking

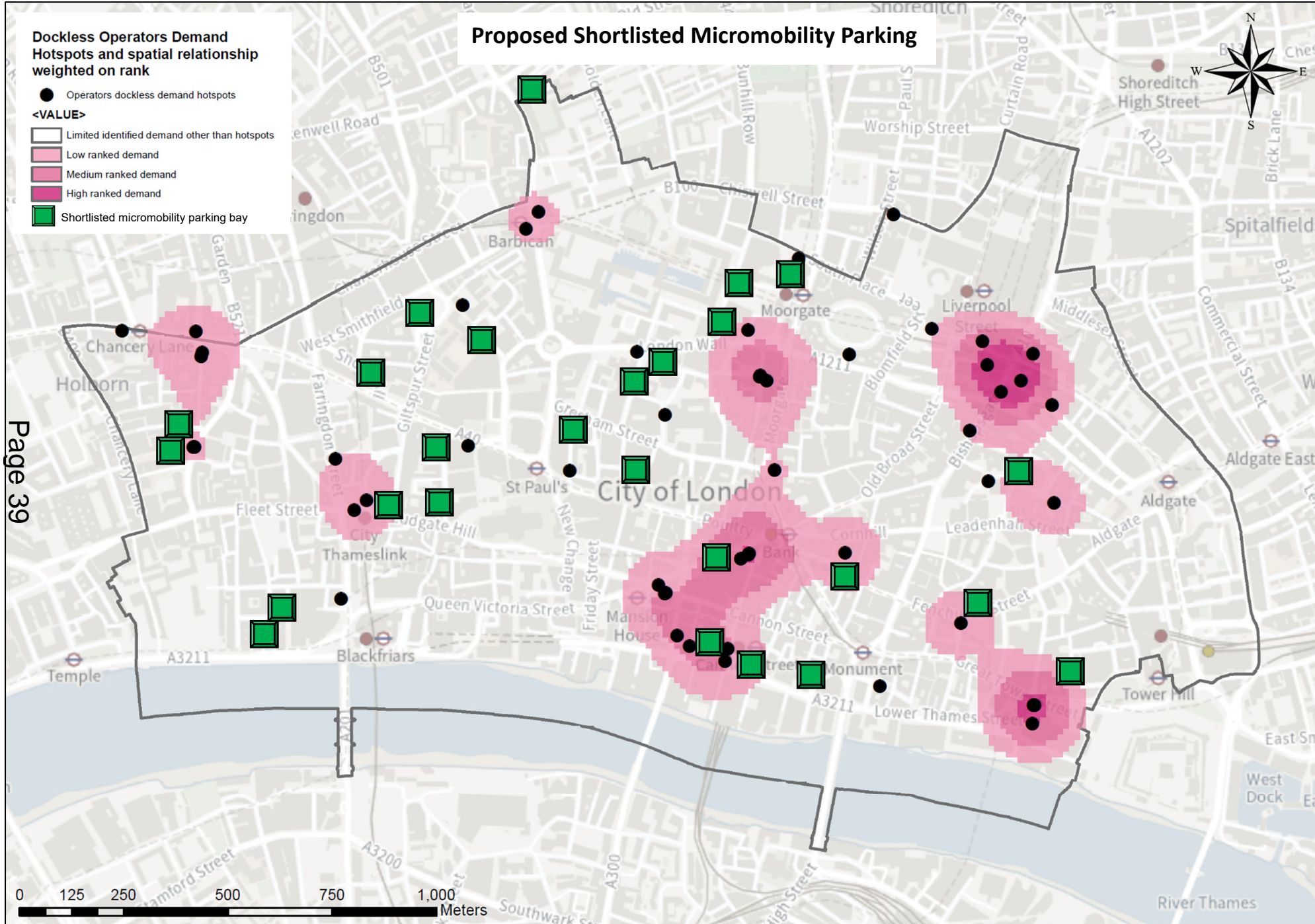
Dockless Operators Demand Hotspots and CoL Priority Locations

- Operators dockless demand hotspots
- CoL Priority Locations**
- Delivery 2024/25
- Delivery 2025/26
- Delivery 2026/27
- <VALUE>**
- Limited identified demand other than hotspots
- Low ranked demand
- Medium ranked demand
- High ranked demand

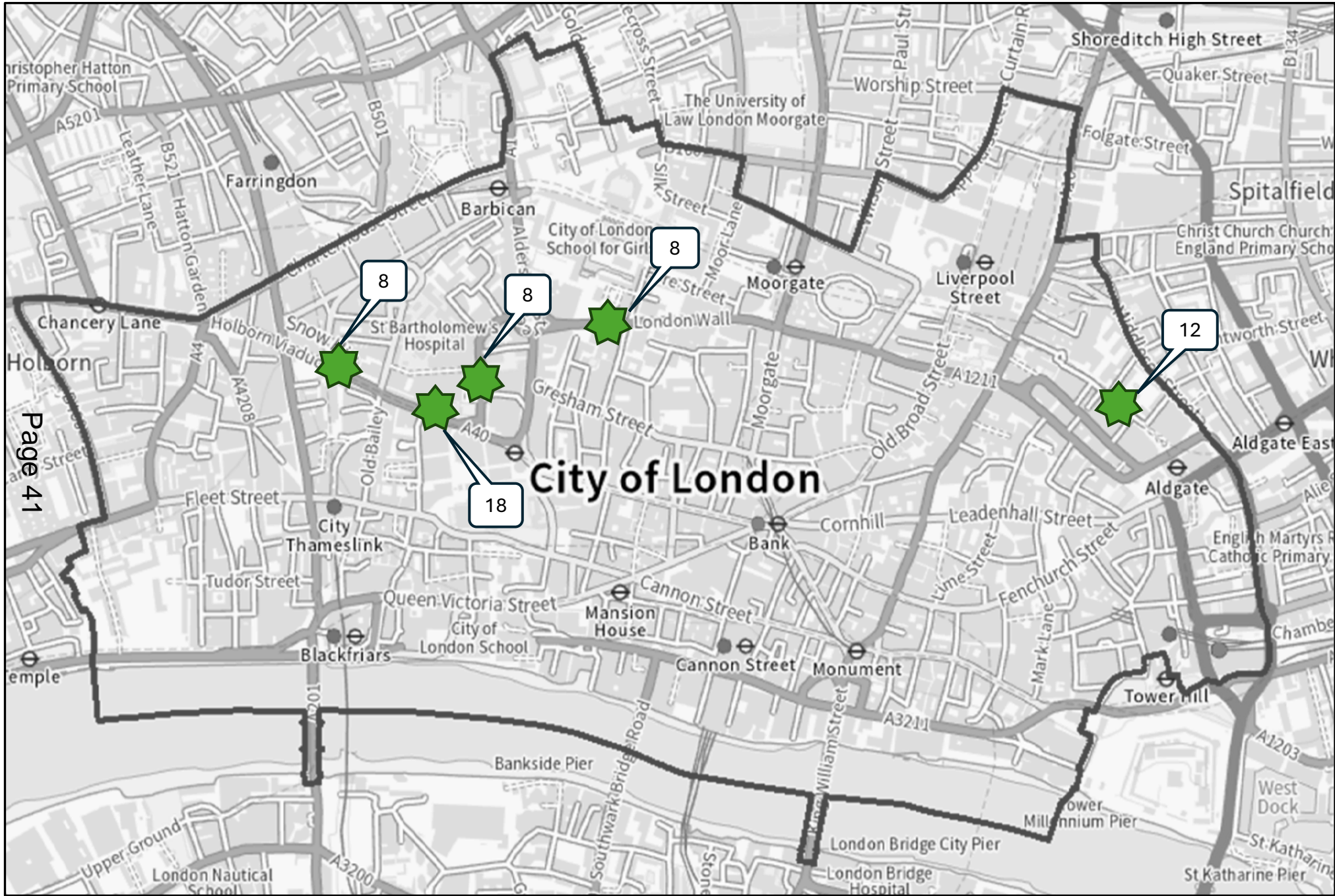
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Cycle Parking Reallocation

- KEY**
-  Proposed cycle rack location to be partly reallocated to dockless cycle hire
 -  Number of parking spaces reallocated for dockless cycle hire

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<p>Committees: Streets and Walkways Sub - For Information Projects and Procurement Sub - For information</p>	<p>Dates: 09 July 2024 15 July 2024</p>
<p>Subject: Dauntsey House, Frederick’s Place - Public Realm Improvements (S278) Unique Project Identifier:12411</p>	<p>Gateway 1/2 Light Progress Report</p>
<p>Report of: Bob Roberts, Interim Executive Director for Environment</p> <p>Report Author: Emmanuel Ojugo</p>	<p>For Information</p>
PUBLIC	

<p>1. Status update</p>	<p>Project Description: Public realm improvements related to the redevelopment of Dauntsey House, 4A & 4B Frederick’s Place, are captured in Schedule 9 of the Section 106 Agreement and read as follows:</p> <p style="text-align: center;"><u>Schedule 9: Indicative Description of the Section 278 Works</u></p> <p>The Section 278 Works may include but will not be limited to:</p> <ol style="list-style-type: none"> 1. Works to Ironmonger Lane in accordance with the approved Cheapside & Guildhall Area Strategy, including new paving and a raised section of carriageway or a raised table, to cater for new and existing pedestrian movement between Frederick's Place, St Olave's Court and Prudent Passage; 2. New lighting around the development; 3. Any works necessary to accommodate pedestrian movement immediately south of the Development around the private loading area; 4. Works to accommodate waiting and loading restrictions; and 5. Any other works that the City Corporation considers necessary to make the Development acceptable in planning terms. <p><u>Current Position</u></p> <p>The Dauntsey House development is nearing completion. The developer has recently confirmed that hoarding/scaffolding currently erected around the site, particularly in a section of Ironmonger Lane is expected to be removed by the end of July 2024. The City will soon</p>
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be able to access the site to progress design and evaluation further. This will inform the content of the Section 278 Agreement currently being drafted in accordance with the approved Section 106 Agreement and the resources required to implement works.

RAG Status: Green

Risk Status: Low

Total Estimated Cost of Project (excluding risk): The previous report (Gateway 1/2) suggested the project could be delivered within the budget range of £350K - £600K. The resources required to implement the project will be confirmed at the next reporting stage.

Spend to Date: £5,938

Table 1: Spend to date - 16800500: Dauntsey House S278			
Description	Approved Budget (£)	Expenditure (£)	Balance (£)
Env Servs Staff Costs	8,000	3,253	4,747
P&T Staff Costs	12,000	2,685	9,315
P&T Fees	5,000	-	5,000
TOTAL	25,000	5,938	19,062

Costed Risk Provision Utilised: N/A

2. Key points to note

Next Gateway: Gateway 3/4/5

Key Points:

On 19 March 2024, Members of the Streets and Walkways sub-Committee approved the initiation of a traffic experiment to reopen Old Jewry to all traffic in a southbound direction, at all times.

The same report noted that, while there was not a need to directly link improvements to Ironmonger Lane with the Old Jewry experiment, there was the potential to improve accessibility and increase pedestrian priority on Ironmonger Lane.

In accordance with the March report, it is proposed to widen the scope of this project to accommodate the whole of Ironmonger Lane (see Appendix 2), subject to a bid for On-Street Parking Reserve (OSPR) or alternative.

The redevelopment of Dauntsey House includes the opening of a pedestrian through-route linking Fredericks Place and Ironmonger Lane and will likely change pedestrian flows in the area. This project looks to accommodate that change.

The development also provides a colonnade on Ironmonger Lane for people walking within the curtilage of the building, adjacent to what will be a new retail offer.

	<p>Ironmonger Lane has characteristically narrow pavements and does not meet minimum requirements for accessibility. Initial proposals would concentrate on improving accessibility for walking and wheeling along the whole length of Ironmonger Lane by raising the carriageway to footway level where possible.</p> <p>It is worth noting the indicative description of Section 278 Works, summarised in paragraph 1: <i>Status Update</i>, stated that improvement works would be in accordance with the Cheapside & Guildhall Area Strategy (2015). The Strategy summarises the following opportunities for Ironmonger Lane:</p> <ul style="list-style-type: none"> • Raise carriageway to footway level to improve walking route; • Introduce traffic management, subject to studies to restrict vehicle access while allowing access to essential servicing; • Promote the use of the additional space for the retails to provide al-fresco dining. <p>The Section 106 Agreement suggests raising a section of Ironmonger Lane. Whilst the Strategy aspiration is to raise the Ironmonger Lane carriageway to footway level in its entirety, initial proposals concentrated on raising the carriageway adjacent to the Dauntsey House footprint between 4a and 4b Fredericks Place. (see plan in Appendix 2).</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • To note this progress report.
<p>3. Reporting period</p>	<p>This is a progress report, updating Members about necessary changes to the design evaluation methodology to accommodate looking at the whole length of Ironmonger Lane following the March 2024 report.</p> <p>The next report is likely to be a Gateway 3-5 anticipated in November 2024.</p>
<p>4. Progress to date</p>	<p>4.1. Following, the March report to Committee, it was necessary to re-evaluate the proposals for Ironmonger Lane which were being considered as part of the S278 proposals.</p> <p>4.2. In early June 2024, City Officers met with the developer of Dauntsey House at 4a and 4b Fredericks Place, to ascertain their programme. They expect to dismantle the hoarding and scaffolding by the end of July 2024.</p> <p>4.3. Officers are now evaluating the needs of the street beyond the existing Dauntsey House footprint and considering how these are to be incorporated into a wider scope for Ironmonger Lane. Options will be developed as part of this process and reported to Members in November 2024 with a view to extending the scope of the project subject to a funding bid for additional resources to accommodate the wider ambition.</p>

<p>5. Next steps</p>	<p>5.1. Following the removal of hoarding/scaffolding on Ironmonger Lane the project needs to fully evaluate the resources required to carry out the proposed improvement works, both within the red line boundary of the Dauntsey House development (S106); and a further proposal to extend beyond the Section 278 Works boundary to improve accessibility for people walking and wheeling.</p> <p>5.2. This may include looking at restricting traffic on Ironmonger Lane for part of the day to accommodate people walking, wheeling and cycling along here in the busier parts of the day.</p> <p>5.3. Healthy Street Design Checks, City of London Streets Accessibility Tool and a test of relevance for equalities will be undertaken.</p> <p>5.4. Complete the Section 278 Agreement as stated in the approved Section 106 Agreement for Dauntsey House.</p> <p>5.5. Prepare a funding bid for improvements to incorporate the full length of Ironmonger Lane subject to statutory approvals; to be taken forward as part of an expanded scope for the existing project to deliver the Section 278 for Dauntsey House. We expect to be able to bid for funding in autumn of this year.</p> <p>5.6. Submit a further report in November 2024 seeking approval of designs and/or implementation with an anticipated construction period starting in February 2024.</p>

Appendices

Appendix 1	Project Coversheet
Appendix 2	Site Location Plan
Appendix 3	Images

Contact

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Telephone Number	07597 425 829

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Project Coversheet

[1] Ownership & Status

UPI:

Core Project Name: Frederick's Place S278

Programme Affiliation (if applicable): N/A

Project Manager: Emmanuel Ojugo

Definition of need: The project seeks to deliver changes to areas of public highway in the vicinity of the development at Dauntsey House, 4A & 4B Frederick's Place. The project is to be fully funded by the developer through a Section 278 agreement.

Ironmonger Lane is a street with low volumes of traffic and it is typified by narrow footways that are not accessible as a result. The street was identified in the Cheapside and Guildhall Area Enhancement Strategy (2015), as a location that would benefit from the carriageway being raised to footway level.

The scope of the project is referred to in schedule 9 of the associated Section 106 agreement, and is as follows:

INDICATIVE DESCRIPTION OF THE SECTION 278 WORKS

The Section 278 Works may include but will not be limited to:

1. Works to Ironmonger Lane in accordance with the approved Cheapside & Guildhall Area Strategy, including new paving and a raised section of carriageway or a raised table, to cater for new and existing pedestrian movement between Frederick's Place, St Clave's Court and Prudent Passage;
2. New lighting around the development;
3. Any works necessary to accommodate pedestrian movement immediately south of the Development around the private loading area;
4. Works to accommodate waiting and loading restrictions; and
5. Any other works that the City Corporation considers necessary to make the Development acceptable in planning terms.

Other Considerations

It should be noted that proposals must consider planned improvements to Old Jewry as part of the ongoing Healthy Streets programme and other areas of highway activity in the wider Guildhall/Bank area.

Key measures of success:

- 1) Improvements to walking and cycling conditions to streets and spaces in the vicinity of the development.
- 2) Integration of new pedestrian routes with the surrounding public highway
- 3) Improved greening, and opportunities to increase local biodiversity in keeping with City's policies to respond to Climate Change.

Expected timeframe for the project delivery: Quarter 4 2024 and Quarter 1 2025

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Key Milestones: Completion of the City Walkway Agreement and Section 278 Agreements – Quarter 3/4, 2024.

Completion of the design Quarter 3-4, 2024

Are we on track for completing the project against the expected timeframe for project delivery? Y, However, this is dependant upon the developer's programme, namely confirming occupation, fitting out of units, obtaining the necessary approvals and completing legal agreements. Officers have tried to facilitate by meeting with the developer to ascertain details of their programme.

Has this project generated public or media impact and response which the City of London has needed to manage or is managing? No

[2] Finance and Costed Risk
<p>Headline Financial, Scope and Design Changes: The previous report to Committee in November 2023 suggested the expected cost range to implement the project was between £350K-£600K. The final figure for implementing the project will be confirmed prior to the next reporting stage.</p>
<p>'Project Briefing' G1 report (as approved by Chief Officer 07/11/23):</p> <ul style="list-style-type: none">• Total Estimated Cost (excluding risk): £350K-£600K.• Costed Risk Against the Project: N/A• Estimated Programme Dates:<ul style="list-style-type: none">○ Carry out site surveys - Q2 2024○ Outline design for local consultation - Q3 2024○ Gateway 3/4 – Q4 2024 <p><i>Scope/Design Change and Impact:</i> It was suggested that the scope of the project would be increased to take in the rest of Ironmonger Lane. However, this is subject to securing an additional funding bid.</p>
<p>'Project Proposal' G2 report (as approved by PSC xx/yy/zz):</p> <ul style="list-style-type: none">• Total Estimated Cost (excluding risk): £350K-£600K• Resources to reach next Gateway (excluding risk) £25K• Spend to date: £5,938 of £25K for Evaluation and Design• Costed Risk Against the Project: N/A• CRP Requested: £0• CRP Drawn Down: £0• Estimated Programme Dates:<ul style="list-style-type: none">○ Carry out site surveys - Q2 2024○ Outline design for local consultation - Q3 2024○ Gateway 3/4 – Q4 2024 <p><i>Scope/Design Change and Impact:</i> It was suggested that the scope of the project would be increased to take in the rest of Ironmonger Lane. However, this is subject to securing an additional funding bid.</p>
<p>'Options Appraisal and Design' G3-4 report (as approved by PSC xx/yy/zz): tbc</p> <ul style="list-style-type: none">• Total Estimated Cost (excluding risk): N/A• Resources to reach next Gateway (excluding risk) N/A

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- Spend to date: N/A
- Costed Risk Against the Project: N/A
- CRP Requested: N/A
- CRP Drawn Down: N/A
- Estimated Programme Dates: N/A

Scope/Design Change and Impact:

'Authority to start Work' G5 report (as approved by PSC xx/yy/zz): tbc

- Total Estimated Cost (excluding risk): N/A
- Resources to reach next Gateway (excluding risk) N/A
- Spend to date: N/A
- Costed Risk Against the Project: N/A
- CRP Requested: N/A
- CRP Drawn Down: N/A
- Estimated Programme Dates: N/A

Scope/Design Change and Impact: N/A

Total anticipated on-going commitment post-delivery [£]: It is expected that there will be a small uplift in the ongoing post delivery costs given the simplicity of the project against additional retail vendors in the area. Maintenance costs are expected to compare favourably with the existing maintenance regime in the area.

Programme Affiliation [£]: Pedestrian Priority Streets Programme – Old Jewry, Streets & Walkways Sub Committee, 30/01/2024

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APPENDIX 2: SITE LOCATION PLAN



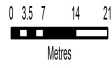
Dauntsey House,
Frederick's Place -
Public Realm
Improvements (S278)

Legend

- REDEVELOPMENT SITE
- INDICATIVE PROJECT AREA

Created by:
E Ojugo

Date Created:
24 Jun 2024



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OS 100023243

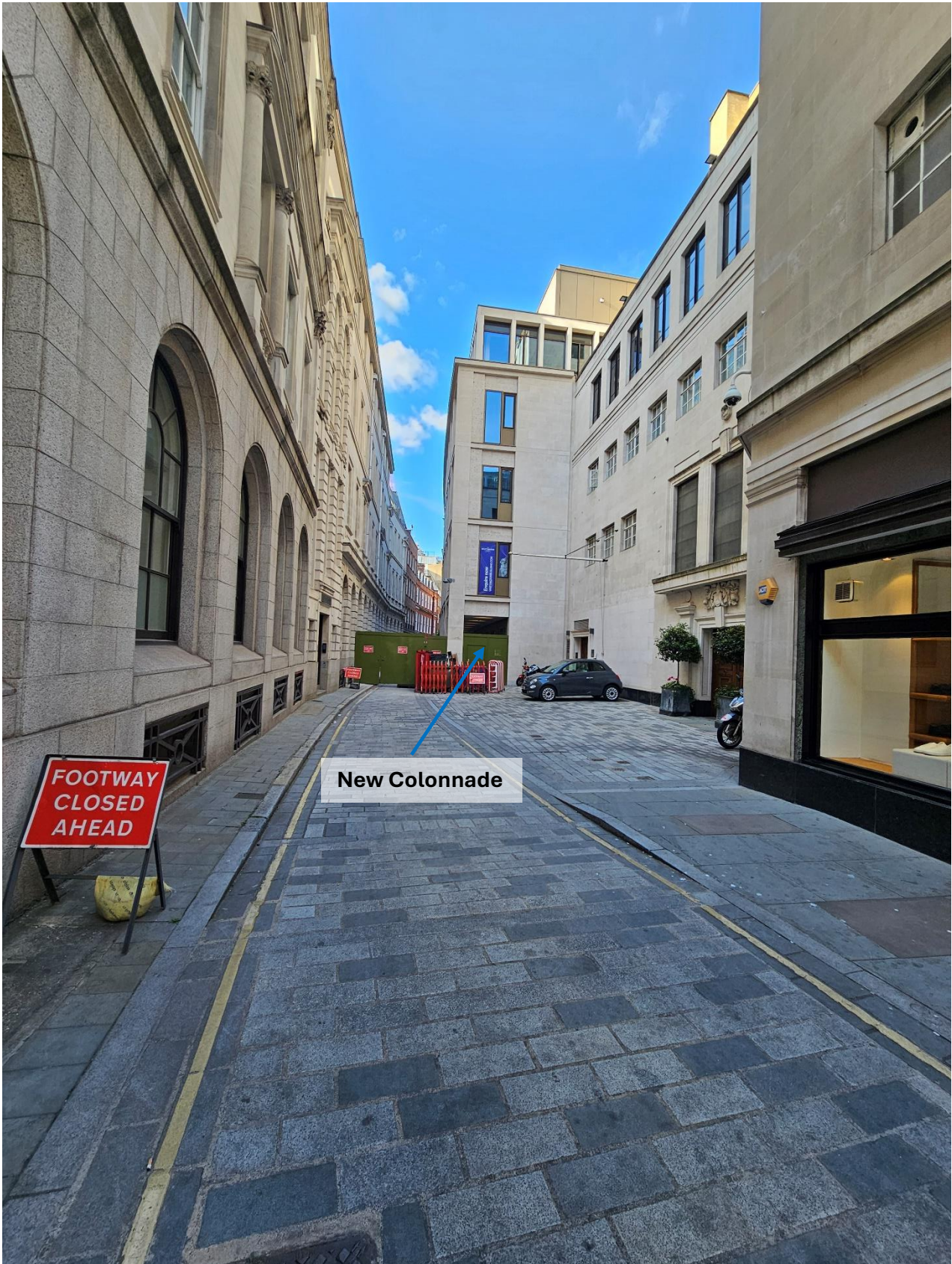
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APPENDIX 3: IMAGES | DAUNTSEY HOUSE, FREDERICK'S PLACE



Dauntsey House – Frederick's Place | Looking west from Old Jewry

APPENDIX 3: IMAGES | DAUNTSEY HOUSE, FREDERICK'S PLACE



Ironmonger Lane | Looking north towards Dauntsey House

APPENDIX 3: IMAGES | DAUNTSEY HOUSE, FREDERICK'S PLACE



Ironmonger Lane | Dauntsey House Colonnade, recently completed

APPENDIX 3: IMAGES | DAUNTSEY HOUSE, FREDERICK'S PLACE



Ironmonger Lane | Hoarding to be removed to initiate improvements

Committee: Streets & Walkways Sub Committee	Dated: 09/07/2024
Subject: Red Badge Holder Survey	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Vibrant thriving destination Diverse engaged communities
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	N
Report of: Interim Executive Director Environment	For Information
Report author: Andrea Larice, City Operations	

Summary

In Summer 2023 the City of London Corporation conducted a survey to gain insights into the parking experiences of Red Badge holders in the City of London. The survey findings will inform the wider Disabled Parking Review, as part of the ongoing review on kerbside space and its utilisation in the City, as outlined in the Transport Strategy.

The Survey was sent to all 154 registered Red Badge holders, with options to respond online, via paper, or over the phone. Respondents were asked to reply to ten questions that collected both quantitative and qualitative data on their experiences and were given six weeks to complete the Survey. The City Corporation received 54 completed surveys (a 35% response rate).

Analysis of responses found general satisfaction with current parking provision and availability while also highlighting several specific challenges and opportunities for improvement. Seven key actions were developed in response to survey findings. These include:

- Further examining parking occupancy data against the findings of the survey to determine if additional bays are needed.
- Consider parking distribution to identify areas that need additional bays.
- Implementing stricter enforcement to prevent the misuse of disabled parking bays.

The Disabled Parking Review will ensure disabled parking provision better meets the needs of disabled individuals, ensuring a more inclusive and efficient use of kerbside space.

Final recommendations will be brought to this committee for decision as part of the Disabled Parking Review in January 2025

Recommendation(s)

Members of the Streets & Walkways Sub Committee are asked to note the report.

Main Report

Background

1. The kerbside is an important area public space that serves a variety of functions and purposes, including for public transport, loading and servicing activities, greenery, public amenities, space for people walking and a variety of other uses.
2. As part of a wider review of how kerbside space is used the City Corporation is assessing how Disabled Parking is utilised. To inform this review it was important to engage with Red Badge holders to better understand their experiences of parking in the City of London.
3. A local Red Badge parking scheme applies in the City with specific criteria and restrictions different to those for the national Blue Badge scheme. The Red Badge parking concession scheme is for City workers and residents. The Blue Badge scheme applies but with more limited benefits.
4. Currently, to qualify for a Red Badge the applicant must meet the following criteria:
 - Live within the City of London or work on a permanent basis at least 21 hours per week in the City of London; and
 - Be in receipt mobility allowance or the higher rate of the mobility component of the disability living allowance and provide satisfactory proof that they are in receipt of this.
5. The Contact Centre (City of London Police) is responsible for the administration of the Blue Badge Scheme for City residents and the Red Badge Scheme for City residents and permanent City workers. This includes making decisions on who is eligible for a badge, carrying out residency and identity checks, and dealing with applications and telephone enquiries from applicants for both schemes.
6. A survey of Red Badge holders was carried to:
 - Explore perceptions of the amount of disabled parking in the City of London
 - Identify barriers to disabled people parking in the City, including but not limited to availability of spaces, and potential solutions for removing / reducing these.

- Gather insight around the impact of other travel modes and issues on disabled people.
- Capture participants' ideas for any further actions to improve parking in the City of London, which may include action in relation to specific bays.
- Gather insight around the impacts on disabled people of being able to / not being able to park in a suitable location for an end destination in the City.

The results of the survey are summarised below and provided in full in Appendix 1.

7. Red Badges are valid for one year and as of July 2023, when this survey was undertaken' there were 154 Red Badges on issue.

Red Badge holder survey methodology

8. The survey was developed with the support of Transport for All, a “disabled-led group breaking down barriers and transforming the transport system so disabled people can make the journeys we want, with freedom, dignity, ease and confidence”. Transport for All gave feedback on questions, ensured language was inclusive, and advised on the survey distribution to ensure it reached as wide an audience as possible.
9. The survey was circulated to 154 Red Badge holders in July 2023 who were given six weeks to respond. The survey was made available in a range of formats to encourage participation including:
 - An online Microsoft Form survey
 - A paper survey posted to each Red Badge holders registered address, with a prepaid return envelope
 - an option to complete the survey via telephone
10. Posters were displayed in the Barbican, Shoe Lane and Artizan Libraries to help remind badge holders to respond to the survey, where to obtain one if they did not receive it, and who to contact if they preferred to have help filling it.
11. The survey asked ten questions using both open text and closed questions, collecting both quantitative and qualitative data from respondents. Analysis of all qualitative data received through responses to open text questions were processed using an open text coding analysis method called Response Coding. For this purpose, a code is a word or short phrase that describes something that is characterised in the data. The code captures the meaning or the aspects that are relevant to the question within that data segment. Open coding adopts an inductive approach, requiring officers to examine the data with as few preconceived notions as possible.

Red Badge holder survey key findings

12. The City Corporation received 54 completed Surveys representing a 35% response rate. 19 surveys were completed online and 35 were returned via post as paper copies.

13. Of the 54 respondents, 29 were City workers (54%), 21 were City residents (39%), three were both a City resident and a City worker (6%), and one respondent did not provide a response.

Respondents use their badges frequently

14. All respondents completed this question and when asked how frequently respondents make trips that require them to park in the City, 87% said they do so at least once a week, with 50% saying they do so at least once a day, suggesting that respondents use their Red Badges frequently. Very few respondents (14%) indicated they make trips fortnightly or less.

15. Usage of parking facilities included:

- On-Street Parking: The most popular option, used by 93% of respondents.
- Pay and Display: Used by 65% of respondents.
- Single Yellow Lines: Used by 33% of respondents.
- Disabled bays in car parks: Used by 24%
- Residential parking: Used by 22%,
- Workplace parking: Used by 11%

Parking is generally available when needed

16. All respondents completed this question, and it showed that Red Badge holders felt parking availability was:

- High: 52% of the respondents reported that they could always or nearly always find a place to park where they needed to.
- Moderate: 41% of respondents could sometimes find a parking space
- Low: Only 6% said they rarely could.

A majority are satisfied with parking provision

17. Satisfaction with parking provision:

- Satisfied: 61% of respondents were satisfied or very satisfied with the amount of Red Badge parking available in the City.
- Neutral: 19% were neutral,
- Dissatisfied: 21% were dissatisfied or very dissatisfied.

Respondents face a number of barriers

18. 45 out of 54 respondents completed this question.

19. Nine respondents did not leave a response and five respondents noted they did not have barriers to parking in the City of London. Having no barriers to parking was the fifth highest response.

20. The main barriers to parking in the City:

- Lack of disabled parking bays: Identified as the main issue by majority of respondents.
- Misuse of bays: Disabled bays occupied by non-badge holders were a significant barrier.
- Yellow Line time restrictions: The 30-minute parking limit on yellow lines was considered too short by many respondents.
- Not being able to park close enough to the respondent's destination.
- Access issues relating to bays: including cycles locked to signs blocking disabled spaces, unlevel surfaces by bays, and difficulty locating bays were also cited as barriers.

21. The top three suggestions to improve parking in the City of London given by respondents were:

- Increase the number of disabled parking bays, especially near points of interest.
- Increase education and enforcement of bays to prevent non-badge holders from using disabled bays.
- Extend time limits on single yellow lines to allow Red Badge holders more time to complete their tasks.

22. Respondents left 39 locations related comments, where they felt additional bays or changes were needed to improve their experience of parking in the City. In total 30 individual locations were cited, with the following locations mentioned more than twice:

- Cheapside/One New Change was recorded five times
- St Bartholomews Hospital/EC1A 7BE was recorded three times
- Bank/Bank of England was recorded four times

23. Other notable comments received from Red Badge holders included requests for:

- further accessibility improvements across the City, such as safer and more accessible pavements.
- give more consideration to disabled drivers affected by road closures and construction.
- improve wayfinding.
- review of the Red Badge application process and criteria, including considering bi-annual or tri-annual Red Badge renewals. One

respondent expressed concern that changes in their working hours could affect their eligibility for a Red Badge.

Other modes of transport respondents use

24. Walking or wheeling was the most common alternative to driving, with 11 respondents noting its use. Eight of these highlighted negative sentiments, citing challenging street environments like cobblestones and steep slopes, long distances from stations.
25. Taxis were the second most common mode and experiences were mixed; some praised the accessibility of taxis, while others mentioned high costs, wayfinding difficulties, and unpredictable journey times.
26. Six respondents used the Underground or rail, mostly expressing negative sentiments about cost, inaccessibility, and overcrowding. Six respondents also used buses, generally reporting negative experiences due to overcrowding, unsafe driving practices, and unpredictable journey times, although two had positive experiences. Six people stated they do not or cannot use other transport modes, often for health reasons.
27. Three respondents used mobility scooters but faced issues with kerbs and wayfinding. Four respondents did not specify a mode of transport but mentioned difficulties with wayfinding, cyclists travelling too fast, and road closures or restrictions.

Administration of Red Badges

28. When asked about their understanding of Red Badge holder concessions, 93% of respondents were aware that they had free parking at on-street payment parking bays and disabled bays and free parking on a single yellow line for a period of 30 minutes. This supports that the Red Badge scheme is being well used, and suggests it is being effectively communicated to Badge holders.
29. Furthermore, three respondents praised the Red Badge Administration Team for their helpfulness and excellent service, with comments highlighting their politeness and prompt assistance.
30. Another three respondents emphasized the usefulness of the Red Badge Scheme, expressing gratitude for its continuation.

Next Steps

31. As part of the City Corporation's commitment to improving parking for Red Badge holders and ensuring people have equal opportunities to enrich their lives and

reach their full potential the following recommendations have been put forward for further investigation as part of the Disabled Parking Review:

1. Notify Red Badge holders of the outcomes of the Survey.

Contact all Red Badge holders who took part to thank them for their input, circulate the results of the Survey and notify them that the findings and actions into the wider Disabled Parking Review, which forms part of the wider Kerbside Review 2024/25.

2. Review the report findings against parking occupancy data

Feedback indicates general satisfaction with parking availability but highlights a lack of disabled parking bays as the biggest barrier Red Badge holders face. Further investigation and review of occupancy data to identify overutilised bays and areas needing more bays, particularly for streets with only one disabled bay.

Conduct a Red Badge Parking distribution mapping exercise to identify areas with limited disabled parking. Explore the feasibility of providing additional disabled to address any gaps in provision.

3. Improve education and enforcement to reduce misuse of Red Badge holder parking

Proactively enforce against vehicles illegally parked in disabled bays to reduce misuse of disabled bays by non-disabled users. Consider the use of behaviour change and educational campaigns to remind people not to park in disabled bays or park in a way that can cause obstruction.

Provide Red Badge holders with phone number and email address to report non-badge holders in bays, or other issues, directly to our enforcement service who can despatch rapid response officers.

4. Extend permitted parking time on yellow lines for Red Badge holders

Explore extending the parking time limit on yellow lines for Red Badge holders to allow more time for tasks such as shopping or appointments, alleviating the pressure of short time limits.

5. Audit existing disabled parking spaces to remove accessibility barriers

Audit disabled parking spaces to ensure high standards of accessibility and to prevent occupancy by non-badge holders. This will help remove barriers identified by respondents.

6. Review Red Badge eligibility criteria and administration

Review and update the Red Badge eligibility criteria to reflect post-COVID-19 flexible working patterns. Consider bi-annual renewals to reduce administrative

burdens. Ensure the policy aligns with the Corporate Plan to support workplace equality and a thriving economy.

7. Continue to champion inclusive streets and improve the accessibility of our street and transport connections

Continue improving accessibility through the Transport Strategy by keeping pavements obstruction-free, encouraging safer cycling behaviours, engaging the community in decision-making, and work with Transport for London to enhance accessibility in Underground and DLR stations.

Corporate & Strategic Implications

32. Having a robust Red Badge scheme is integral to ensuring we have a vibrant, thriving destination where everyone prospers. This supports the delivery of Corporate Plan Outcome: Vibrant thriving destination.

33. The Red Badge scheme is integral to ensuring our residents and workers, can feel that they belong. Engaging with our Red Badge holders will help build diverse, engaged communities that are involved in co-creating great services, which supports the delivery of Corporate Plan Outcome: Diverse engaged communities.

Legal implications

34. None identified at present.

Financial implications

35. None identified at present.

Equality Implications

36. A detailed Test of Relevance was conducted ahead of the Survey development and did not highlight any significant issues. Transport for All were appointed to assist with the development of the Survey to ensure we had a disabled-led group advice.

37. Any outcomes resulting from the recommendations will need further Equalities Impact Assessment analysis.

Risk implications

38. There is a possible reputational risk to the City Corporation if the accessibility of our streets is not carefully considered. It is imperative that we work towards an inclusive accessible City where everyone can navigate their surroundings independently and safely.

Climate implications

39. None identified at present.

Conclusion

40. These findings suggest that while a significant portion of Red Badge holders are satisfied and able to find parking in the City of London, there remains a number who experience difficulties locating parking.

41. Further work will need to be done as part of the Disabled Parking Review to better understand the occupancy rates, the distribution of Red Badge holder parking in the City, and the effects of implementing the recommended changes to single yellow line restrictions and the Red Badge Eligibility Criteria.

42. Red Badge holders that took part in the survey will need to be notified of the results and thanked for their input.

Appendix

- **Red Badge Holder Survey**

Andrea Larice

Strategic Transport Planner

Strategic Transport Team

Environment Department

E: strategic.transportation@cityoflondon.gov.uk

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Red Badge Holder Survey Results

Environment Department

May 2024

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Please note this report has been written using 12pt Arial, simple language and using basic graphics to make it accessible to a wide range of audiences, however, if you need assistance reviewing this report, please do not hesitate to contact us via telephone: 020 7606 3030 or email: strategic.transportation@cityoflondon.gov.uk

Executive Summary

The primary objectives of the Red Badge Holder survey (survey) were to assess the availability and accessibility of disabled parking, identify barriers faced by Red Badge holders, and gather suggestions for improving parking in the City of London. The Survey is part of a broader review on kerbside space and its utilisation in the City of London, as outlined in the City Corporation's Transport Strategy.

The survey was distributed to all 154 registered Red Badge holders, with options to respond online, via paper copy, or over the phone. The survey period lasted from July 24 to September 8, 2023. It included both quantitative (multiple choice) and qualitative (open text) questions to capture comprehensive data on parking usage, satisfaction, barriers, and suggestions for improvements.

The City Corporation received 54 completed surveys (a 35% response rate). Of the 54 respondents, 29 respondents were City workers (54%), 21 were City residents (39%), three were both a resident and a worker (6%), and one respondent did not provide a response (2%).

Survey key findings

Use of Parking Facilities:

- On-street disabled parking bays are the most popular, used by 93% of respondents. Followed by Pay and Display parking and parking on single yellow lines.
- Fewer respondents used car parks, residential parking or workplace parking.

Red Badge holder perceptions of parking availability:

- More than half of the respondents (52%) felt they could always or nearly always find a place to park where they needed to.
- 41% said they could sometimes find a place to park, and only 6% said they could rarely park where they needed to.

Satisfaction with Red Badge holder parking provision:

- 61% of respondents were satisfied or very satisfied with the amount of Red Badge parking in the City of London.
- 19% were neutral, while 21% were dissatisfied or very dissatisfied.

Challenges and barriers to parking:

- 45 responses were received to this question.
- The lack of disabled parking bays was as the main issue (cited 18 times).
- Disabled bays being occupied by non-badge holders was the second most cited barrier.
- The Yellow Line time restriction (of 30 minutes) was identified as being too short for completing tasks and deterred Red Badge holders from using them.

Difficulty finding a space close to the intended destination was also identified as a significant barrier.

- Respondents noted that often physical barriers prevented them from accessing parking bays, these included unlevel and cobbled road surfaces, difficulties accessing the roadside, cycles being locked to signage causing obstruction, and signage and cycles blocking access to the kerbside.
- Nine respondents did not leave a response and five respondents noted they did not have barriers to parking in the City of London. Having no barriers to parking was the fifth highest response.

Other types of transport

Difficulty parking in the City of London is not the only barrier that Red Badge holders face when trying to get around the City, and these challenges need to be considered holistically. Respondents noted they faced access barriers to using public transport, taxis and when walking / wheeling. They noted a lack of step-free access to Tube / rail stations, lifts that are out of order, challenging pavements, unpredictable journey times, fear of people riding cycles at speed, and poor cycle parking behaviours causing obstructions on pavements as some of their challenges.

Communication and administration of Red Badges

When asked about their understanding of Red Badge holder concessions, 93% of respondents were aware that they had free parking at on-street payment parking bays and disabled bays and free parking on a single yellow line for a period of 30 minutes. Three respondents praised the Red Badge Administration Team for their helpfulness and excellent service, with comments highlighting their politeness and prompt assistance. Another three respondents emphasized the usefulness of the Red Badge Scheme, expressing gratitude for its continuation. This high level of understanding suggests that the Red Badge scheme is being well used and is being effectively communicated to badge holders.

Next Steps

The Survey findings will inform the Disabled Parking Review, which forms part of the wider Kerbside Review 2024/25. Final recommendations will be brought to City Coporation Committees for decision, as part of the Disabled Parking Review from January 2025.

Next steps will:

1. Address the demand of on street disabled parking bays (especially near key points of interest) through occupancy surveys. This will identify if disabled parking spaces are overutilised and where additional bays might be necessary.

Undertake a mapping distribution analysis to identify areas with poor disabled

parking density and availability. Cross referencing these with locations reported by Red Badge holders as lacking parking.

2. Implement proactive enforcement to prevent misuse of disabled parking bays by non-badge holders and consider the use of educational campaigns to inform people driving and cycling about the importance of keeping bays available for badge holders.
3. Explore the potential to extend the permitted parking time on single yellow lines for Red Badge holders to allow more time to complete their tasks.
4. Audit disabled parking with the aim of improving parking for disabled people and reducing occupancy by non-badge holders could assist in removing some of the barriers identified by respondents. Auditing on-street Red Badge parking bays will ensure we are providing high standards of parking and management across the City of London.
5. Given the change in working patterns and flexible working post COVID19 it is recommended the Red Badge holder eligibility criteria and application process is reviewed to ensure it is fit-for-purpose.
6. Continue improving accessibility through the ambitions of the Transport Strategy. Keeping pavements obstruction-free, encouraging safer cycling and driving behaviours, engaging the community in decision-making, and working with our partners Transport for London to enhance accessibility in Underground and DLR stations.

Conclusion

The survey found that Red Badge holders use their Badges frequently and understand the concessions available to them. Survey respondents primarily use on-street disabled bays, pay and display bays and yellow lines. They are generally able to find parking and are satisfied with Red Badge holder parking in the City of London. However, Red Badge holders experience a number of difficulties and challenges accessing parking. The responses highlighted the emotional impact of these barriers, with many expressing frustration, pain, and fatigue. Addressing these concerns through further review of parking occupancy data, increased enforcement, and ensuring parking is accessible will significantly enhance the parking experience for Red Badge holders in the City of London.

Introduction and Survey Objectives

The City of London Corporation (the 'City Corporation') is responsible for managing the kerbside on all streets within the Square Mile, except for the Transport for London Road Network (TLRN). The kerbside is a key area of public space within the Square Mile that provides a variety of infrastructure and allows a number of activities to take place.

The City of London's Transport Strategy (City of London Corporation 2019) sets out how the City's streets will be designed and managed over the next 25 years to ensure it remains a great place to live, work, study and visit. The Transport Strategy's outcomes include using street space more efficiently and effectively and ensuring streets are accessible to all. The kerbside has been identified as an element of the street that could be made more efficient and thus its use and management, with City Corporation car parks, should be kept under frequent review. This includes the use of the kerbside by people who hold Red Badges to ensure adequate provision of well-located disabled parking bays.

As part of a wider review of how kerbside space is utilised in the City of London, it was decided to undertake a Red Badge Holder Survey (Survey) to engage with Red Badge holders to better understand their experiences of parking.

The survey was designed to:

- Explore perceptions of the amount of Red Badge holder parking in the City of London
- Identify the challenges and barriers to parking in the City of London, including but not limited to the availability of spaces and potential solutions for mitigating these barriers.
- Gather insight around the impact of other travel modes.
- Capture participants' ideas for any further actions to improve parking in the City of London, which may include action in relation to specific bays.
- Gather insight on the impact of not finding parking on Red Badge holders.

Background on the Blue and Red Badge schemes

The Blue Badge (Disabled Persons' Parking) scheme helps people with long term mobility problems access goods and services by allowing them to park closer to their destination, giving some benefits or exemptions from certain traffic management restrictions on street and often in car parks. The scheme provides a national range of on-street parking concessions (Department For Transport, 2020).

Due to specific traffic management concerns the Blue Badge scheme does not fully apply in the City of Westminster, the City of London, the Royal Borough of Kensington and Chelsea and part of the London Borough of Camden. These four

local authorities offer their own individual parking concessions to disabled people who live or work in their areas.

The City Corporation's local Red Badge parking scheme provides some different criteria and restrictions in the City of London. The Blue Badge scheme applies but with limited benefits in the City of London.

The Blue Badge scheme

The benefits of the Blue Badge scheme to badge holders in the City are summarised below. To take advantage of these a Blue Badge holder must display the clock and the Blue Badge so that the serial number, expiry date and the issuing authority are clearly displayed.

Parking in designated disabled bays on-street

- Over 200 bays are available for free, provided the badge and clock are displayed. These can be used for up to four hours on weekdays. Around St Bartholomew's Hospital the bays can be used for up to six hours on weekdays. There is no time limit Saturday and Sunday.

Payment in parking bays with conditions on street

- Blue Badge holders can park for an extra hour, for free, at payment parking bays after the expiry of the purchased time.

Blue Badge holders cannot park.

- in a suspended bay
- on single or double yellow lines
- where there is a loading restriction indicated by yellow chevrons on the kerb stone
- on the pavement or footway
- in a bus lane
- in a bay reserved for specific users (e.g., a doctor's bay)
- where there is a dropped kerb or raised carriageway

The Red Badge scheme

Red Badge holders can park:

- in disabled parking bays without paying
- in payment parking bays without paying
- on a single yellow line for a maximum period of 30 minutes

Red Badge holders cannot park:

- in a suspended bay
- on double yellow lines

- where there is a loading restriction indicated by yellow chevrons on the kerb stone
- on the pavement or footway
- in a bus lane
- in a bay reserved for specific users (e.g., a doctor's bay)
- where there is a dropped kerb or raised carriageway

Red Badges are valid for one year and as of July 2023, when this survey was undertaken, there were 154 Red Badges on issue.

Currently, to qualify for a Red Badge the applicant must meet the following criteria:

1. Live within the City of London or work on a permanent basis at least 21 hours per week in the City of London; and
2. Be in receipt mobility allowance or the higher rate of the mobility component of the disability living allowance and provide satisfactory proof that they are in receipt of this.

The Contact Centre (City of London Police) is responsible for the administration of the Blue Badge Scheme for City residents and the Red Badge Scheme for City residents and permanent City workers. This includes making decisions on who is eligible for a badge, carrying out residency and identity checks, and dealing with applications and telephone enquiries from applicants for both schemes.

Survey Methodology

The survey was posted to all Red Badge holders and sought to:

- Explore perceptions of the amount of disabled parking.
- Identify issues and barriers to accessing parking in the City of London.
- Better understand what changes could improve accessibility, which may include action in relation to specific bays.
- Gather insight around the impact of other travel modes.
- Understand if the Red Badge scheme is fit for purpose.

It was developed with the support of Transport for All, a “disabled-led group breaking down barriers and transforming the transport system so disabled people can make the journeys we want, with freedom, dignity, ease and confidence”. Transport for All gave feedback on questions, ensured language was inclusive, and advised on the survey distribution to ensure it reached as wide an audience as possible.

The survey was circulated to 154 Red Badge holders on 24 July 2023 with the closing date of Friday 8 September 2023. This gave all Red Badge holders six weeks to respond to the survey.

It was made available in a range of formats to encourage participation:

- An online Microsoft Form survey.
- A paper survey posted to each Red Badge holders registered address, with a prepaid return envelope.
- And an option to complete the survey via telephone, with an officer.

Posters were displayed in City of London libraries including the Barbican, Shoe Lane, and Artizan Library to help remind badge holders to respond to the survey, where to obtain one if they had not received it, and who to contact if they preferred to have help completing the survey (Appendix 1).

The survey asked 10 questions using both open text and closed questions, collecting both quantitative and qualitative data from respondents.

- The quantitative method asked closed questions, which gave the respondent a limited number of options to choose from and gathered numeric data.
- The qualitative method was used to understand Red Badge holders’ experiences, attitudes and behaviours. This was collected through open text questions allowing the respondent to write what they wished.

The full list of survey questions can be found in Appendix 2.

Analysis of all qualitative data received through responses to open text questions were processed using response coding. A code is a word or short phrase that describes something that is characterised in the data. The code captures the meaning or the aspects that are relevant to the question within that data segment.

A maximum of four codes were recorded in each open text response, and these were generally the first four points raised or noted by the respondent. All codes were reviewed and codes that related to one another were compiled into one overarching code where necessary. In addition to these four codes, the open text questions recorded the persons feelings as a sentiment code and any street or parking locations. For example:

“Not enough disabled bays. Work vans, scaffolding lorries or delivery drivers often block disabled bays in Cheapside. This is frustrating when trying to find parking as it means I cannot park”.

The above comment would be coded as:

- Code 1: Not enough disabled bays
- Code 2: Spaces used by non-badge holders (trade and delivery vehicles)
- Location code : Cheapside
- Sentiment code: Negative (frustration)

This analysis process coding adopts an inductive approach, requiring officers to examine the data with as few preconceived notions as possible. Making sure that the meaning codes match the that data as closely as possible.

Survey Findings

The City Corporation received 54 completed surveys (a 35% response rate). 19 of the 54 responses were completed online and 35 were returned via post as paper copies.

Of the 54 respondents, 29 respondents were City workers (54%), 21 were City residents (39%), three were both a City resident and a City worker (6%), and one respondent did not provide a response (2%).

Parking facilities, usage and the understanding of concessions

Survey respondents were asked to identify what parking facilities they used. They were given the following options and asked to tick all that apply.

- On-street disabled parking bay
- Disabled parking bay in a car park
- Single yellow line
- Pay and display parking bay
- Parking space at my workplace
- A private or residential parking space
- Other

The survey found that respondents use a mix of parking facilities. 70% of respondents indicated they use up to three differing types of parking facilities. Only four respondents indicated they used more than four types of parking facilities and 12 respondents selected only one parking facility.

50 of the 54 respondents (93%) indicated they use on street-parking bays in the City. This was followed by 35 respondents (65%) indicating they use pay and display bays and 18 respondents (33%) indicating they use or park on single yellow lines.

13 respondents (24%) indicated they use disabled bays in car parks, 12 respondents noted they used residential parking (22%) and 6 respondents (11%) indicated they use parking spaces provided by their workplace.

A full breakdown of responses can be found Figure 1.

This highlights that on-street disabled parking bays are by far the most used parking option for Red Badge holders, followed by pay and display bays.

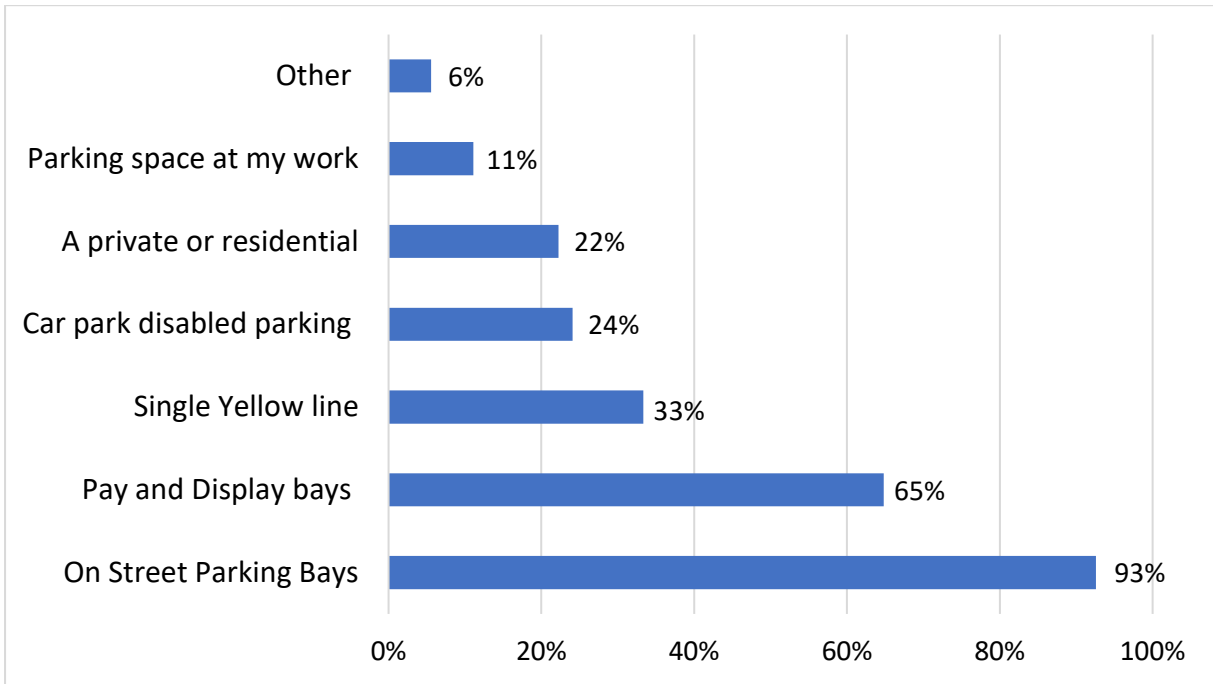


Figure 1: The types of parking facility respondents use when parking in the City.

When asked how frequently respondents make trips that require them to park in the City, 87% said they do so at least once a week, with 50% saying they do so at least once a day, suggesting that respondents use their Red Badges frequently. Very few respondents (14%) indicated they make trips fortnightly or less (Figure 2).

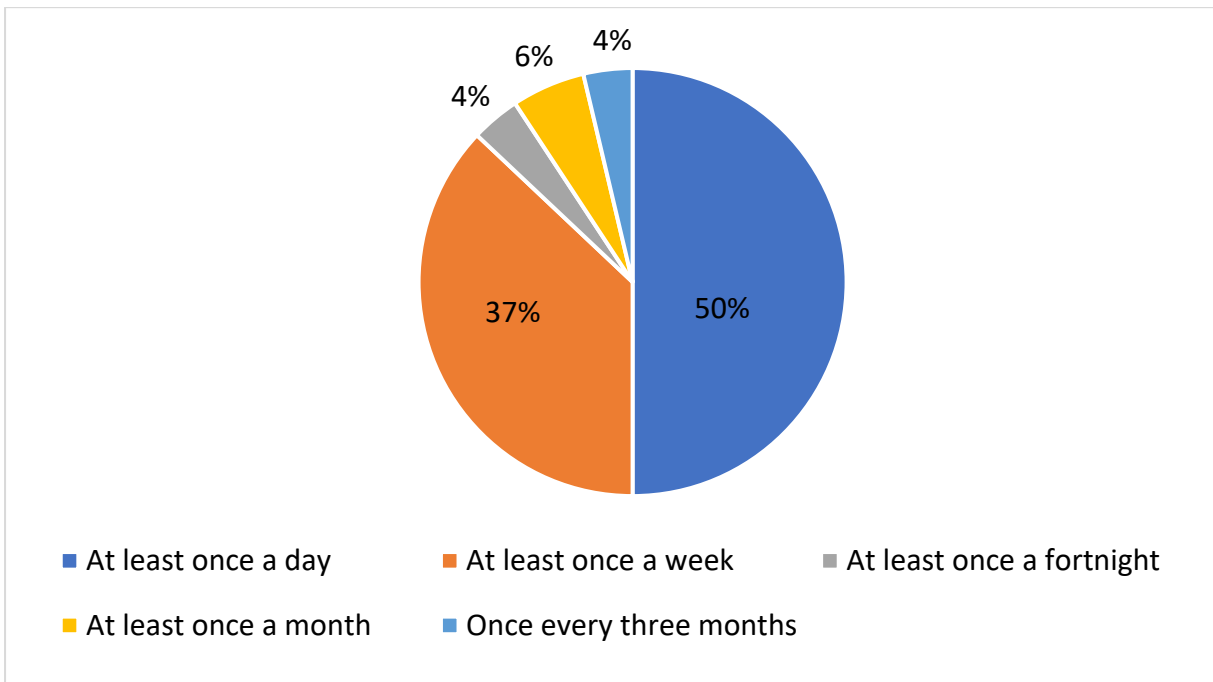


Figure 2: Responses to "How often do you make a car journey that requires you to park in the City of London?"

When asked about their understanding of Red Badge holder concessions 50 of the 54 respondents (93%) indicated they were aware that the following concessions were available or applied to them:

- free parking at on-street payment parking bays and disabled bays
- free parking on a single yellow line for a period of 30 minutes

Barriers to parking in the City of London

Survey participants were asked what barriers they faced to parking in the City of London. The Survey received 45 open text responses, and these were processed using open code analysis as outlined above.

12 themes were identified across 71 coded elements. Those themes are summarised below in alphabetical order.

1. Access issues relating to parking bay
2. Can't park on red routes
3. Difficult to find a space close to destination
4. Difficult to locate bays
5. Face no challenges or barriers to parking
6. High parking costs
7. Loss bay due during or after construction
8. No yellow lines close to me
9. Not enough disabled spaces
10. Spaces used by non-badge holders
11. Traffic restrictions and congestion
12. Yellow line limit to short

Nine respondents did not leave a response to this question and five respondents noted they did not have barriers to parking in the City of London. Having no barriers to parking was the fifth highest response (Figure 3).

The most common barrier to parking, cited and coded 18 times, was a lack of disabled parking bays within the City of London (Figure 3). Contributing factors include a general lack of parking bays, over occupancy of bays and the need for specific bays for certain Red Badge holders. Respondents noted:

- *“Not enough disabled bays in general”*
- *“Finding a parking bay that has gradual kerbs not blocked by other motorists or obstructions”.*
- *“In recent years due to construction of new buildings a lot of the disabled bays and pay and display bays have disappeared, even after construction is complete”.*

Further detail in responses indicated a variety of vehicles were parking in these bays, including trades vehicles, delivery vehicles and taxis. Cars causing

obstructions were included in this theme as it meant Red Badge holders could not use the bay and the results highlight that the misuse of bays is a significant barrier. Respondents noted:

- *“Delivery vehicles, workers in vans and taxi drivers often park in the spaces and make it an issue if you ask them to move.”*
- *“Trades men using disabled bays - stricter enforcement is necessary. I worry about finding disabled bays that are available”.*
- *“Black taxis, Uber drivers and work vans believe they can park in disabled spaces and nip in to get a coffee because they’ll only be a couple of minutes – very frustrating”.*

A lack of available bays was not the only barrier to parking in the City identified by respondents.

Time restrictions on single yellow lines was noted as the third most significant barrier, together with difficulty finding a parking space close enough to the respondent’s intended destination, each theme cited 7 times.

Several participants felt that the 30 minutes’ time limit for Red Badge holders to park on a single yellow line was not enough. The time restriction did not give some Red Badge holders enough time to accomplish small tasks. Respondents noted:

- *“30 minutes parking is not long enough to complete the reason for parking, hence I do not bother.”*
- *“Generally, I find it a challenge to do what I have to do if I can only park on a single yellow line because of the limited 30 minutes”.*

Respondents indicated that if they could not find a space then it was often necessary to make another journey to the destination itself – this can mean extra time or cost incurred for those respondents. Respondents noted this caused them to also travel further than intended leaving them feeling in pain, tired or frustrated. Some respondents noted they are so deterred by this barrier that in some cases they do not make the journey, or they use a different mode (and face the barriers associated with that mode instead).

Barriers preventing Red Badge holders from using bays were cited 5 times.

Respondent comments included difficulties finding unobstructed gradual kerbs near disabled bays, lack of space getting wheelchairs out of cars due to poorly parked vehicles, cycles locked to disabled signs causing obstructions or blocking access to the kerbside. Unlevel and cobbled pavements and road surfaces were also recorded. Respondents noted:

- *“Spaces are limited especially on busy roads; bikes being locked to the disabled sign cause difficulty getting wheelchair up onto pavement”*
- *“If that single disabled bay is occupied, I cannot park in the other bays as there is no room to get my wheelchair out”*

Motor vehicle traffic restriction (including one-way streets), congestion and construction preventing cars to access streets make it difficult to drive in the City and park close to your destination.

- *“The main problem is not with parking but with road closures and road works. It is now difficult to drive from A to B in the City”.*
- *“Most places are no go areas driving through. Almost every road is cut off or bicycles only. The whole point of driving is due to poor mobility. Parking further away from where one is supposed to be going makes no sense”.*

Other barriers noted are provided below:

- Difficulty locating bays or not knowing which bays are free and which are occupied can mean driving around.
- Bays being occupied or removed during or after construction, reducing parking availability.
- Red Badge holders being unable to use yellow lines due to certain Streets not having them.
- High parking costs in the City of London.

Accessing locations on Red Routes was also quoted as a barrier. Red Routes are a network of major roads managed by Transport for London. They make up 5% of London's roads but carry up to 30% of London's traffic. They do not fall under the highway authority powers of the City of London Corporation. Transport for London has general information on concessions for Blue Badge holders on streets that have priority, also known as (red) route controls. Holders can obtain this information by ringing TFL on 0845 305 1234 or by visiting the TFL [website: https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes/blue-badge-disabled-parking](https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes/blue-badge-disabled-parking)

Discussing the barriers Red Badge holders face when travelling and parking in the City of London was emotive for some respondents. Of the 13 respondents who expressed their sentiments two were positive and described travelling and parking as “easy”, however, the 11 others expressed negative sentiments. Noting it can be “difficult”, “painful”, “frustrating”, “tiring”, “worrying”, “inconvenient” and/or a combination of these.

Many respondents suggested improvements and changes to mitigate barriers, including using enforcement and education to deter people parking in Red and Blue Badge bays, extending the time on yellow lines, updating the disabled bay map and using real-time occupancy data to allow people to find a parking space more easily.

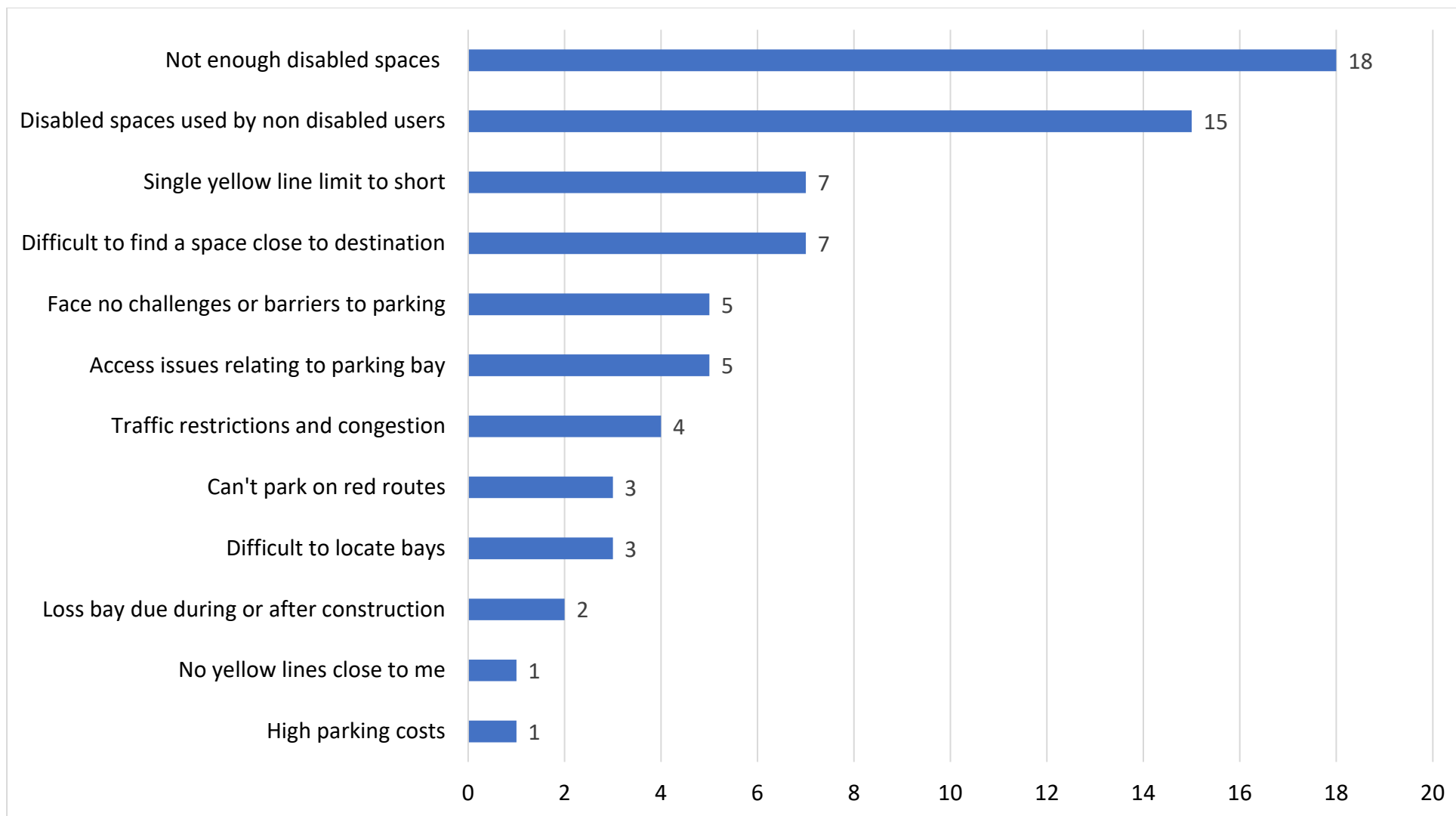


Figure 3: Responses to the challenges and barriers respondents face when parking in the City of London

Current parking provision for Red Badge Holders

Respondents were asked how they perceived the current level of provision for Red Badge holders in the City of London. The Survey found that more than half of respondents (52%) felt that “they could always” or “nearly always” find a place to park where they needed to. 41% felt that they could “sometimes find a place to park” and 6% said they could rarely park where they needed to (Figure 4).

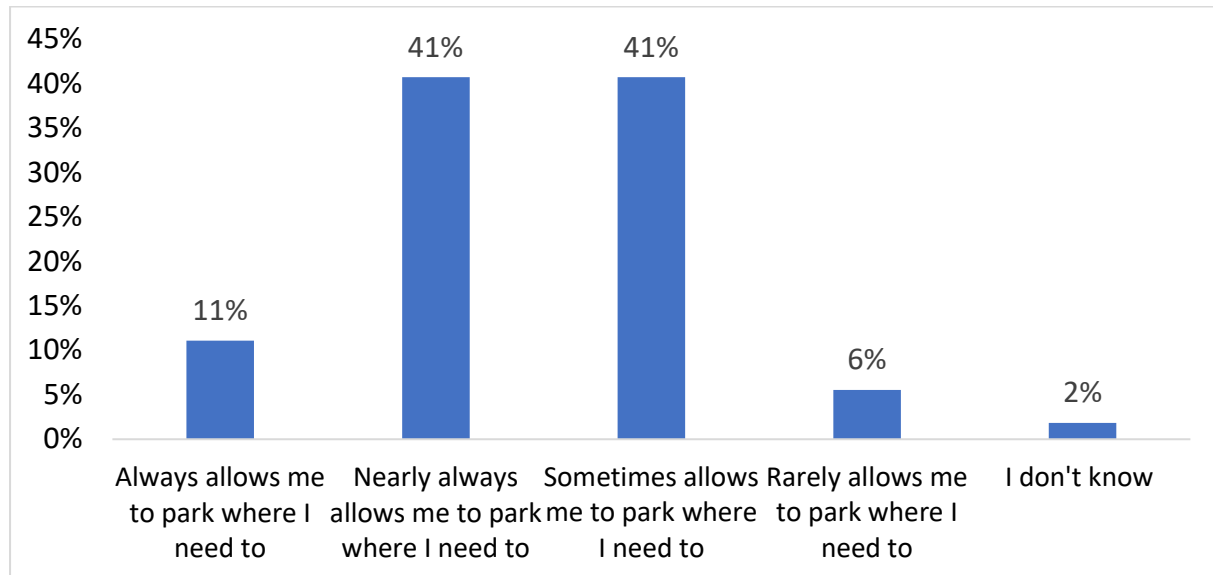


Figure 4: Responses to “How do you currently find parking provision for Red Badge holders in the City of London” (Please note that percentages % have been rounded up hence why they do not add up to 100%)

When Red Badge holders were asked if they were content with the amount of Red Badge parking provision in the City of London 61% indicating that they were “satisfied” or “very satisfied” with amount of Red Badge parking provision. 19% were “neither satisfied nor dissatisfied”, 17% felt “dissatisfied” and 4% felt “very dissatisfied” (Figure 5).

This suggests that while most Red Badge holders are generally content with the current provision of parking in the City of London, there is a notable minority who are not.

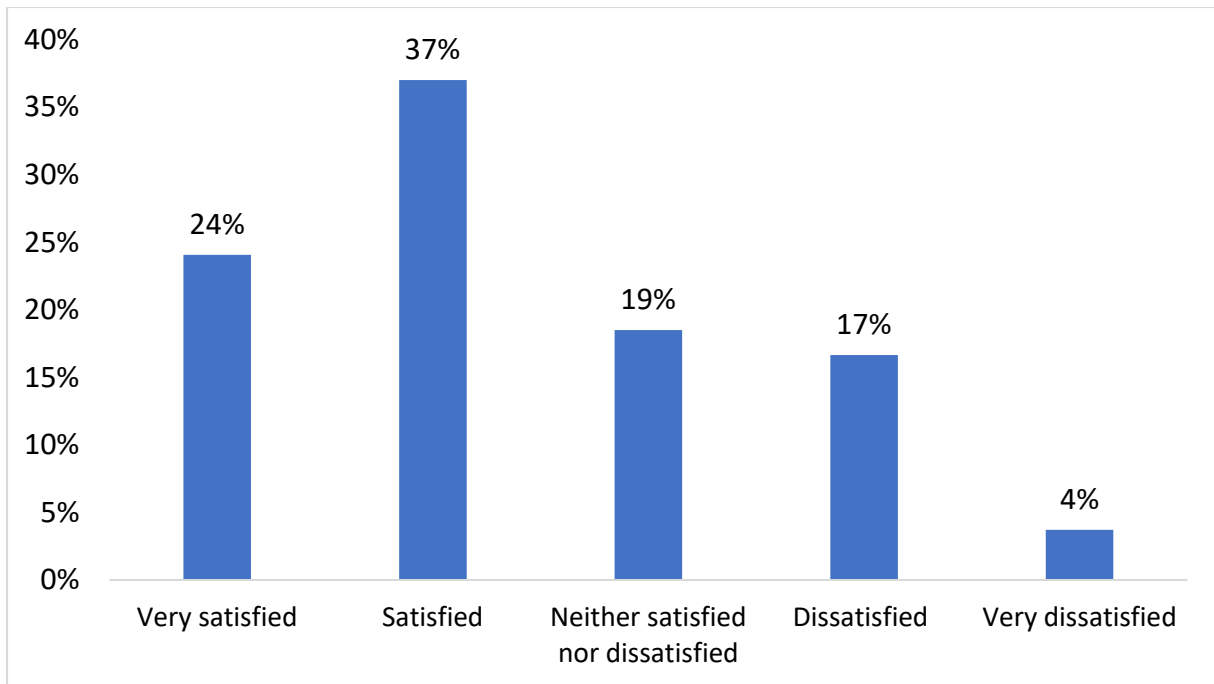


Figure 5: Responses to “Overall, how satisfied are you with the amount of Red Badge parking provision in the City of London?”

Improving parking provision for Red Badge holders

Respondents were asked what the City Corporation could do to improve the experience of disabled parking in the Square Mile, alongside identifying specific locations or streets they felt needed more bays or changes. Responses were received as open text and processed using open code analysis. All locations were noted.

44 responses were received, which generated 51 codes across 14 themes. Those themes are summarised below in alphabetical order:

1. Better signage/map of disabled bays
2. Encourage new buildings to have parking
3. Felt current disabled parking was fine
4. Implement similar parking rules to Islington
5. Implement single yellow lines close to schools
6. Inset parking bays away from traffic
7. Longer parking times on yellow lines
8. More disabled parking bays in general
9. More disabled parking bays near points of interest
10. More enforcement and education
11. Provide temporary bays, when removed for construction
12. Reduce the number of parking restrictions
13. Review the Red Badge Policy qualification criteria
14. Update the badge recognition system

The most noted theme was “More disabled bays”, which when combined with “More disabled bays at points of interest” resulted in 57% of response codes (Table 1).

The second most cited request was an appeal for “more enforcement” to reduce non-bade holders parking in disabled bays and requests for further education for “inconsiderate” drivers of the importance of leaving disabled bays for those who need them.

The third most cited request was extending the time limit for Red Badge holders to park on a single yellow line, which would improve the experience of parking in the City of London. Difficulty locating bays or not knowing which bays are free and which are occupied was noted as a barrier and can mean respondents spend time driving around. Updating the disabled bay map and improving wayfinding were also noted as ways to improve parking in the City.

Table 1: Theme responses (raised by more than one participant) to improve experience of disabled parking in the City of London.

Suggestion Category	Number of times raised by respondents	Percentage %
More disabled parking bays	24	47%
More enforcement and education	6	12%
More disabled parking bays near points of interest	5	10%
Felt current disabled parking was fine	3	6%
Longer parking times on yellow lines	3	6%
Better signage/map of disabled bays	2	4%

Respondents left 39 locations related comments, where they felt additional bays or changes were needed to improve their experience of parking in the City. In total 30 individual locations were cited, with the following locations mentioned more than twice:

- Cheapside/One New Change was recorded five times
- St Bartholomews Hospital/EC1A 7BE was recorded three times
- Bank/Bank of England was recorded four times

A full list of locations can be found in Appendix 3.

Requests to Review of the Red Badge application process and criteria was raised by two participants in the Survey, in different ways. One noted the City should consider bi-annual or tri-annual Red Badge renewals. While another respondent expressed concern that changes in their working hours could affect their eligibility for a Red Badge.

Other types of transport

Respondents were asked if they used other types of transport to get around the City of London (including bus, taxi, and walking or wheeling) and encouraged to provide more detail regarding their lived experience if they felt comfortable to do so.

Responses were received as open text and processed using open code analysis. Each response was assigned up to two modes of travel or "codes", which were then used for understanding the level of sentiment toward different themes and issues. All locations were noted. Any responses that did not mention a mode of transport or that re-noted their experiences of driving in the City were coded as "Other".

A total of 34 responses were received, resulting in 46 open text codes across seven themes. Those themes are summarised below in alphabetical order:

1. Bus
2. Mobility scooter
3. No other mode
4. Other
5. Taxi and/or Private Hire
6. Underground and/or train
7. Walking or wheeling (using a wheelchair or mobility aid)

Seven of the 34 respondents stated they used more than one than one mode to travel around the City of London.

Walking and/or wheeling (using a wheelchair) was the most common mode of travel if respondents could not use their cars. 11 respondents noted that they walked or wheeled if they did not drive. Eight of these responses were associated with negative sentiments regarding challenging streets and/or pavement environments including cobblestones, raised flagstones, steep slopes and lack of ramps. Some respondents expressed that long distances from London Underground or train stations to their destinations were tiring and, in some cases, painful to travel. One respondent stated that crossing streets unaccompanied can be difficult and dangerous at times, and two others stated that when they walked, they had a fear of people cycling too fast.

Using a Taxi was the second most common mode of travel. 10 people noted they used Taxi's, with one noting they also used private hire. Survey respondents experience of using Taxis were mixed. Two participants noted it was a positive experience due to Taxi's having ramps and assistance. One person noted they preferred not to take a taxi, and another described his experience as negative because wayfinding is often difficult, with road closures and traffic leading to unpredictable journey times. The high cost of travel was also noted as a negative aspect of using a taxi.

Six respondents noted they used the underground or trains, with five people expressing negative sentiments and experiences due to cost, inaccessible stations including those without lifts and overcrowding.

Six respondents noted they used buses. These experiences were generally negative due to overcrowding including not being able to find a seat, bus drivers not waiting for passengers to sit down resulting in injury or fear of injury, traffic and unpredictable journey time. However, two participants felt that they worked very well and had positive experiences.

A further six people noted they do not, or cannot use any other modes, with two participants noting this is for health-related purposes.

Three respondents noted they used their mobility scooters, and that often kerbs aren't low enough and that wayfinding can be difficult.

Finally, four respondents did not note the mode of travel but noted:

- Wayfinding is difficult, and that google maps is not always up to date with restrictions
- People riding cycles at speed is an issue
- There are too many road closures and restrictions in the City of London

Additional open text responses

The final question of the Survey asked respondents if there was anything else they wanted to share with the City Corporation. Comments were received in open text paragraphs, and each significant point made by the respondent were categorised into codes. The first four points noted by the recipient were taken into consideration.

The 24 responses to this question, and these were not coded as they were significantly varied.

One of the common response quoted by three respondents were positive remarks regarding the Red Badge Administration Team in the Contact Centre. A few of those comments are included below:

- *"Just to say thank you to you people who deal with the red badge applications - very polite and helpful".*
- *"Team are excellent, really goes the extra mile to help residents with learning difficulties, should be commended please, great understanding and prompt service."*

The other most common response cited by three respondents referred to the Red Badge Scheme being useful. A few of those comments are included below:

- *"Just, please keep the red badge going, it is extremely helpful"*
- *"grateful for the red badge"*

Other comments left by respondents included requests for:

- More accessibility improvements across the City of London including safer, more accessible pavements.
- More consideration to be given to disabled people who have to drive and the impacts of closures and construction.
- More enforcement of poor behaviour from people riding cycles.
- Considering bi-annual/ tri annual Red Badge renewal
- One respondent noted that a change in working patterns hours post COVID has led to them not fulfilling the required hours for Red Badge holders. This could lead to them being unable to renew their Red Badge, which would make traveling to work very difficult. They recommended the process should be reviewed to ensure it is giving disabled people the opportunity to work in the City of London.
- Consideration to allow Red Badge holders to park in any bay (and on Red Routes) without time limits.
- More enforcement of illegal parking in disabled bays, especially at night.
- More disabled bays

Communication and administration of Red Badges

When asked about their understanding of Red Badge holder concessions, 93% of respondents were aware that they had free parking at on-street payment parking bays and disabled bays and free parking on a single yellow line for a period of 30 minutes.

This supports that the Red Badge scheme is being well used, and suggests it is being effectively communicated to Badge holders. Furthermore, several compliments received for the Red Badge Team in the Contact Centre confirm that some holders are appreciative of the scheme and the Team's administration of it.

Conclusion

The key findings from survey responses and feedback are summarised below.

Responses received will be used to inform existing disabled parking bay policies in the wider Kerbside Review being undertaken to improve how the City's limited kerbside space is utilised.

Red Badge holder insights on parking in the City

The survey found that 93% of all Red Badge holders have a good understanding of their concessions and 87% use their Badges regularly, parking in the City of London at least once a week. This high level of understanding of Red Badge holder concessions suggests that the Red Badge scheme is being well used and is being effectively communicated.

Red Badge holders use a mix of parking facilities primarily choosing to park on-street disabled parking bays, followed by Pay and Display bays and single yellow lines. Fewer respondents use disabled bays in car parks, residential parking, or workplace spaces, suggesting these are less desirable, less convenient or available. The potential impact of parking charges in City of London car parks, although not explicitly highlighted, might also be a factor affecting these preferences.

The majority of respondents (61%) expressed satisfaction with the amount of Red Badge parking available, while only 21% noted they were dissatisfied. Most respondents that they could find a place to park where they needed to, with only 6% indicating that they rarely found parking where they need it. These findings suggest that Red Badge holders use their badges regularly and that overall satisfaction and availability are high.

Barriers to parking in the City of London

The survey's exploration of challenges and barriers to parking in the City of London was responded to by 45 of the 54 (83%) respondents. 14 (25%) Red Badge holders did not leave or noted they did not have barriers to parking.

The results identified a range of barriers, with the lack of available disabled parking bays emerging as the most significant challenge. This contradicts the previous section's findings and suggests that while many people felt they could "always or nearly always" find somewhere suitable to park, some disabled people face significant barriers when trying to locate parking in the City.

Respondents frequently mentioned the misuse of these bays by non-badge holders, such as delivery vehicles and taxis, exacerbating red badge holders trying to park.

Time restrictions on single yellow lines and difficulty finding parking near destinations were also significant barriers, causing inconvenience and additional travel for some respondents. Furthermore, challenges related to access issues, such as obstructed kerbs and unlevel pavements, were noted, along with the high parking costs and restrictions on red routes.

The responses highlighted the emotional impact of these barriers, with many expressing frustration, pain, and fatigue. Some respondents noted that they avoided trips or used alternative modes of transport due to these barriers. Some respondents noted that streets that have only one accessible parking bay (such as in Bridgewater Square and on Laurence Poultney Hill) can cause significant challenges for Red Badge holders when the bay is occupied. Several streets and specific locations were identified by more than one respondent as needing more disabled bays. These included significant areas for business and retail such as Cheapside, Bank and Leadenhall, as well as, around St Bartholomew's Hospital, Minories, which have

residential dwellings. The occupancy of bays in these locations may need further review to understand how to improve the parking experience on these streets.

Having no barriers to parking had the fifth highest response (Figure 3), when considered together with the number of participants who did not leave a response (25%). This could support the earlier findings that people are generally satisfied with Red Badge holder parking.

Suggestions for improvement recorded in this section included stricter enforcement against misuse of bays, extending parking time limits on yellow lines, updating maps of disabled bays, and providing real-time occupancy data to aid in finding available parking. Addressing these barriers could significantly enhance the parking experience for Red Badge holders in the City of London.

Locating and accessing parking

The survey results indicate that a 52% of Red Badge holders felt confident in their ability to always or nearly always find a place to park where they needed to in the City of London. Another 41% of respondents reported that they could sometimes find a place to park, while a smaller group, 6%, expressed that they rarely found parking where they needed it.

Respondents noted the following physical barriers to accessing parking:

- unlevel and cobbled pavements, road surfaces and access to the roadside,
- cycles being locked to signage causing obstruction,
- signage and cycles blocking access to the kerbside

City Corporation encourages people to report highway faults and accessibility barriers on our streets and public spaces. This includes lift faults, potholes, carriageway/pavement damage, street furniture defects etc. Anyone can report a fault by calling 020 7606 3030 or using the online reporting tool on the website: https://cityoflondon-self.achieveservice.com/service/Fault_reporting

A few respondents noted that navigating the City of London can be challenging due to one-way streets, road works and road closures not being translated into navigation applications, such as, Google maps or City Mapper. Wayfinding is about knowing where you are, where you're heading, how to get there, and how to recognise when you're there. Planned road closures and traffic restrictions are communicated on the City Corporation website:

<https://www.cityoflondon.gov.uk/services/streets/road-highways-and-pavements/road-closures>. We will continue to improve wayfinding in the City of London. The City Corporation currently has a close relationship with Google, and we will continue to work closely with them, and businesses to improve wayfinding and disabled information. Google has added an "Accessibility attributes" feature to Google maps, which collects information about businesses to share with customers

who have specific accessibility needs. Business can disclose whether they have a step free business entrance, toilets, seating, parking, and lifts for people in wheelchairs. The more information businesses can disclose the more accurately people can plan their journeys.

These findings suggest that while a significant portion of Red Badge holders are generally able to find parking, there remains a substantial number who experience occasional to frequent difficulties locating parking, highlighting the need for further occupancy surveys and review to disabled bay accessibility.

Transport barriers

The Survey looked to gather insight around the impact of other travel modes and issues on disabled people. Respondents identified that difficulty parking in the City of London is not the only barrier to that Red Badge Holders face and these barriers need to be considered holistically.

Access barriers to using public transport and walking / wheeling in the City include lack of step-free access to Tube / rail stations, lifts that are out of order, challenging pavements, poor cycle parking behaviours causing obstructions at disabled bays. Ensuring the streets of the City of London are accessible is integral to the delivery of the Transport Strategy.

The City Corporation continues to make the City's streets more accessible by:

- Applying the City of London Street Accessibility Tool (CoLSAT) on all projects to identify opportunities to improve accessibility.
- Delivering accessibility improvements at locations that are not covered by existing or planned projects through the Healthy Streets, and by working with developers to identify opportunities to resurface our pavements and to introduce step free access as part of new developments and major refurbishments.
- Continuing to engage with construction sites and road works companies to minimise disruption.
- Continuing to liaise with TfL to identify the programme of investment required to make accessibility improvements to stations in the City of London and London's wider public transport network. The ambition within the Transport Strategy is that all stations within the Square Mile will be accessible by 2044.

Next Steps

Red Badge holders who took part in the survey will be contacted and notified of the survey findings. The next steps that will inform the wider Disabled Parking Review, which forms part of the wider Kerbside Review 2024/25.

Final recommendations will be brought to City Corporation committees for decision as part of the Disabled Parking Review from January 2025

1. Review parking occupancy data against Survey findings

The feedback suggests that Red Badge holders can generally find parking and are satisfied with parking availability in the City of London. However, the most common barrier cited was the lack of disabled parking bays.

We will review the demand of disabled parking bays using occupancy audits data (including at key points of interest highlighted by residents). Occupancy audits of disabled parking spaces and other parking facilities have been undertaken for the wider Disabled Parking Review. This occupancy data will be reviewed against the Red Badge Holder Survey report to better understand if disabled parking spaces are overutilised across the City, and if there are certain areas with a high demand for disabled parking where additional bays might be necessary. Examining:

- the full list of Red Badge holder identified locations.
- bay occupancy on streets where there is only one disabled bay. It is clear from the results of the survey that respondent noted that streets that have only one accessible parking bay can cause significant challenges when the bay is occupied. This will help officers understand if more bays are needed. what type of vehicle is occupying the bay as respondents suggest that trades vehicles, delivery vehicles and taxis are parking in disabled bays.

Conduct a Red Badge Parking distribution mapping exercise to identify areas with limited disabled parking. Explore the feasibility of providing additional disabled to address any gaps in provision.

2. Improve enforcement and education to reduce misuse of Red Badge holder parking

Proactively enforce against vehicles illegally parked in disabled bays to reduce misuse of disabled bays by non-disabled users. Consider the use of behaviour change and educational campaigns to remind people not to park in disabled bays or park in a way that can cause obstruction. This will free up more spaces for use by Blue and Red Badge holders.

Provide Red Badge holders with phone number and email address to report non-badge holders in bays, or other issues, directly to our enforcement service who can despatch rapid response officers.

3. Extend permitted parking time on yellow lines for Red Badge holders

Explore extending the yellow line time limit for Red Badge holders could allow disabled people more time to undertake small tasks, which could include, picking up or dropping off, shopping, short health appointments, etc.

Uncertainty about whether it will be possible to find somewhere to park close enough to their destination – both in terms of locating parking and understanding if bay are available is a barrier. Extending the time on yellow lines could help lessen the pressure of a short time limit and allow some Badge holders to park closer to their destination.

4. Audit existing disabled parking spaces to remove accessibility barriers

Audit disabled parking with the aim of improving parking for disabled people and reducing occupancy by non-badge holders could assist in removing some of the barriers identified by respondents. Auditing on-street Red Badge parking bays will ensure we are providing high standards of parking and management across the City of London.

5. Review the Red Badge eligibility criteria and administration

One valuable tool in improving workplace equality and creating inclusive cultures is flexible working. It can help parents return to work, reduce the gender pay gap, help people with fluctuating health conditions stay in work and help carers to balance their work and caring responsibilities. Given the change in working patterns and flexible working post COVID19 it is recommended the Red Badge holder eligibility criteria is reviewed to ensure it is fit-for-purpose.

Respondents noted that the Red Badge renewal process is taxing for some disabled people. City Corporation could consider extending its annual Red Badge renewal to Bi-Annually. This could reduce the reduce administrative costs for City Officers, however, it would need to be investigated further to understand if there are increased costs to Red Badge Holders associated with Bi-annual renewal.

The Office of National Statistics (2023) found that on average, between 2014 and 2021, disabled workers moved out of work at nearly twice the rate (8.9%) of non-disabled workers (5.1%). Furthermore, disabled workers are more likely to be working part time, with 32% of disabled workers and 21.5% of non-disabled workers working part-time. Reviewing the holder eligibility criteria and administration policy

would ensure the policy aligns with the Corporate Plan Vibrant thriving destination by ensuring people have equal opportunities to enrich their lives and prosper. It would support diverse engaged communities by ensuring our residents and workers, can feel that they belong.

6. Continue to champion inclusive streets and improve the accessibility of our street and transport connections

The City Corporation continues to have a strong commitment to improve accessibility in the Square Mile through the Transport Strategy. The Transport Strategy sets out commitments to champion inclusive streets in Outcome 3 and in numerous Proposals throughout the Strategy. Ensuring we:

- Keep pavements free of obstructions.
- Continue to engage with City of London Police, Transport for London, and electric bike operators to encourage safer cycle riding, and cycle parking behaviour across the City to reduce fear of injury due to speed and obstructions on our pavements.
- Encouraging community participation and engagement on our schemes to ensure a diversity of voices are heard through the decision-making process.
- We will work with TfL to prioritise investment in accessibility improvements to Underground and DLR stations.

For more information on the Transport Strategy please visit:

<https://www.cityoflondon.gov.uk/transportstrategy> or request a hard copy of the Strategy from the Transport Strategy Team:
strategic.transportation@cityoflondon.gov.uk

References

1. City of London Corporation (2019). City Streets: Transport for a changing Square Mile, City of London Transport Strategy.
<https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>
2. City of London Corporation: Our Corporate Plan 2018 – 23 (2018).
<https://www.cityoflondon.gov.uk/about-us/plans-policies/corporate-plan>
3. Department for Transport (2020). The Blue Badge scheme: rights and responsibilities in England. <https://www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-responsibilities-in-england/the-blue-badge-scheme-rights-and-responsibilities-in-england>
4. Greater London Authority (2019). Equality, diversity and inclusion evidence base for London. <https://data.london.gov.uk/dataset/equality--diversity-and-inclusion-evidence-base>
5. Office for National Statistics (2023). [Employment of disabled people 2022](https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people-2022).
<https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people-2022>

Appendices

Appendix 1: Red Badge Survey Poster

Appendix 2: Red Badge Holder Survey

Appendix 3: Locations Red Badge holders feel need more disabled bays or attention.

Appendix 4: Risk Register and Mitigation Measures

Are you a Red Badge holder?

Disabled Parking Review

The City of London Corporation is undertaking a review of disabled parking in the City of London.

We would be grateful if you could complete this brief survey on your experiences of parking in the City of London.

Only fill in the survey if you are a Red Badge holder and please DO NOT provide your name or address when responding to the survey.

Please complete and return the survey by Friday 14 July, by scanning the QR code below.

If you would like help to complete the survey or to request a large print version, or would like to feedback your views in person, please feel free to call us on 020 7606 3030, or email us at strategic.transportation@cityoflondon.gov.uk.

Thank you for sharing your experiences of parking in the City of London and your ideas for any improvements that could be made.



Red Badge Holder Survey



1. Are you a...? (tick one) City of London worker

City of London resident

Both

2. When parking in the City of London, which types of parking facility do you use? (tick all that apply)

On-Street disabled parking bay

Car park disabled parking bay in a car park

Single yellow line

Pay and Display parking bay

Parking space at my workplace

A private or residential parking space

Other

3. How often do you make a car journey that requires you to park in the City of London? (tick one)

At least once a day

At least once a week

At least once a fortnight

At least once a month

Once every three months

4. Did you know that Red Badge holders have the following concessions in the City of London? (tick one)

- Free parking at on-street payment parking bays and disabled bays
- Free parking on a single yellow line for a period of 30 minutes

Yes

No

5. What are the challenges and barriers you face when parking in the City of London? (Please give us the location details if it is relevant)

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6. Thinking about the parking provision for Red Badge holders in the City of London, do you find current parking provision? (tick one)

- Always allows me to park where I need to
- Nearly always allows me to park where I need to
- Sometimes allows me to park where I need to
- Rarely allows me to park where I need to
- I don't know

7. Overall, how satisfied are you with the amount of Red Badge parking provision in the City of London? (tick one)

- Very satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very dissatisfied

8. What could the City of London Corporation do to improve your experience of disabled parking in the City of London? Are there any streets or specific locations you feel need disabled bays?

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9. If you use other types of transport to get around the City of London (bus, taxi, and including walking or wheeling), please tell us briefly about your experiences of this.

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10. Finally, is there anything else you would like to share with us?

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Appendix 3: Locations Red Badge holders feel need more disabled bays or attention.

Location identified	Number of times noted by repondants
Cheapside	3
Cheapside - One New Change	2
St Barts (EC1A 7BE)	3
Bank	2
Bank of England	2
Minories	2
Mitre Street	2
Aldgate School	1
Bishopsgate	1
Bloomfield Street	1
Bride street	1
Chiswell St	1
Devonshire Square	1
Finsbury circus	1
Golden Lane	1
Guildhall	1
Haydon street	1
Houndsditch	1
King Edward Street (EC1A 1HQ)	1
Little Somerset Street	1
Liverpool Street	1
Ludgate Circus	1
Minster Court	1
Monument	1
Portsoken Street	1
St Helens	1
St Martin Le Grand (EC1A 4NP)	1
St Pauls	1
Stonecutter	1
Thavies Inn, Holborn	1

Appendix 4: Risk Register and Mitigation Measures

Risk	Mitigation
<p>Validity of questions for the propose of the project, risk scrutiny of the Survey and Survey questions</p>	<ul style="list-style-type: none"> • Work with Transport for All – Who will provide two rounds of feedback on the Survey. • Ensuring the Survey is designed and signed off by the Parking team, Information officers, and Corporate Communications Team. • Ensure the Contact Centre who will support the Survey are briefed and can direct anyone who needs to contact us to complete the Survey. • Survey is approved by Assistant Director of Policy and Projects, and Head of Transport Strategy Team.
<p>The technical and complex nature of some of the language used in the consent for data processing section may make it inaccessible to some disabled people, including people with learning difficulties, dyslexic people and some neurodivergent people.</p> <p>TFA identified the following examples of inaccessible language used include:</p> <ul style="list-style-type: none"> • Special category data • Processing data • “as requested for the purposes of researching the user parking experience”. • Privacy notice • Consent / do not consent / withdraw consent. • Square Mile <p>They also noted that, some disabled people may be concerned about making a legal declaration for the purposes of a Survey.</p>	<ul style="list-style-type: none"> • Make the wording in the request for consent as accessible as possible and if it is necessary to retain technical terms for legal purposes, provide a short explanation of these terms. • Remove the request for consent and explicitly state on the Survey that respondents should not provide any information that could be used to identify them (e.g., name or address etc.). • It is important that only Red Badge holders complete the Survey, so it would be helpful to reiterate this in the introductory text. • Some people may not know what ‘the Square Mile’ means. TFA recommend the Survey reference the ‘City of London’.
<p>The Accessibility Conformance Report for Microsoft Forms outlines the few areas where the Web Content Accessibility Guidelines (WCAG) guidelines are not met. https://www.microsoft.com/en-</p>	<ul style="list-style-type: none"> • Microsoft Forms meets most of the Web Content Accessibility Guidelines (WCAG), the internationally recognised standards for making digital content accessible. This will help ensure that it is accessible to people with a range of impairments, including those

Risk	Mitigation
us/accessibility/conformance-reports	who use screen readers. However, it will be important to ensure that other Survey formats are available.
It may be likely that a high number of questions will either put off or prevent some people from responding. Furthermore, it may take some disabled people longer to complete the Survey particularly if they need to discuss this with people who drive them.	<ul style="list-style-type: none"> • Reduce the number of questions to keep the Survey as short as possible and ensure the questions are short and to the point, written in plain English. • Include open text questions where people can write about their experiences. • Be consistent with adding instructions such as 'Tick one' or 'Tick all that apply'. • Use the 'active voice' rather than the 'passive voice' to makes text more accessible.
Survey is not accessible to our target audience	<ul style="list-style-type: none"> • Multiple Survey formats and channels. It is intended that the Survey will be made available as follows: <ul style="list-style-type: none"> ○ Online Microsoft Form, ○ Paper Survey posted out, ○ Telephone Survey option.
Paper Survey is not accessible	<ul style="list-style-type: none"> • The Survey document uses an easy to read for and 12pt or above text, which meets the requirements for 'clear print'. If the standard Survey document 12 is produced in 14pt font, this may reduce the need for some people to request a large print version. • Boxes be provided on the Survey to make it more obvious where to tick. These should be a comparable size to the text. • Provide sufficient colour contrast between text and backgrounds and avoid putting text on images. • The Survey should be printed on matt paper rather than glossy, and the paper should be sufficiently thick to ensure that the text on the other side cannot be seen through it. • A4 size is recommended as it is the easiest size to handle. • A pre-paid envelope will be included with the Survey. The font used for the Survey should also be used for the address printed on the envelope, so that this is equally as accessible. • Add the address onto the Survey document in case the pre-paid envelope gets lost.

Risk	Mitigation
Telephone Survey interviewer is not leading or bias	<ul style="list-style-type: none"> • The telephone Survey should be completed in the same way as the paper Survey would be. • If the respondent requires further clarification this should be carefully considered to ensure that it is not leading. • Users of textphones, who may be D/deaf or have a speech impairment, may wish to use Relay UK to contact City Corporation It is important to ensure that anyone answering phone calls is aware of how this service works: https://www.relayuk.bt.com/.
<p>Ensure that the timescales for returning the Survey include sufficient time for:</p> <ul style="list-style-type: none"> • Respondents to request an alternative format and this be sent out to them. • Respondents to make contact to ask for assistance with understanding any of the questions on the Survey. • Respondents to arrange assistance for completing the Survey, such as a PA or Support Worker. 	<ul style="list-style-type: none"> • Have the Survey open for at least four weeks. • It may be possible to use the Survey distribution to recruit participants for the workshop. To avoid further issues relating to Data Protection it may be preferable to do this by signposting people to a means of signing up rather than adding a question to the Survey.
We do not get enough respondents filling the Survey	<ul style="list-style-type: none"> • Work with Transport for all. • Ensure the timescales for completing the survey are more than four weeks. • Have multiple ways to fill the Survey, paper, online and via phone. • Have posters encouraging Red Badge holders to complete the Survey. Although the Survey will be posted out, some people may not pay attention to this, or may not get round to completing it. These could be displayed in places where people may have time to complete it whilst they wait, such as, healthcare buildings and libraries.

<i>Date</i>	<i>Action</i>	<i>Officer responsible</i>	<i>To be completed/ progressed to next stage</i>	<i>Notes/Progress to date</i>
14 May 2024 24 June 2024	<u>Reopening of Old Jewry</u>	Executive Director, Environment	5 July	The ETO will go live on 5 July. There was a one week delay due to the advertising agency failing to place the submitted adverts in time for the original go live date of 28 June. ETOs must be advertised in a local newspaper and the London Gazette for 7 days prior to going live.

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