



**Spinal Injuries Association (SIA) Response to Department for Transport
Consultation on Developing a Comprehensive Blue Badge (Disabled Parking)
Reform Strategy**

**Blue Badge Reform 2008 –
Consultation Questionnaire and Response Form : Annex B**

PART 1 - Information about you

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Company **Spinal Injuries Association (SIA)**
Name or
Organisation
(if
applicable)

Please tick one box from the list below that best describes you /your company or organisation.

Small to Medium Enterprise (up to 50 employees)
Large Company

Representative organisation (e.g. disability charity)

Trade Union
Interest group
Local Government
Central Government
Police
Member of the public
Other (please describe):

Are you a Blue Badge holder?

Yes

If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:

SIA has over 5000 members and represents the interests of approximately 40,000 people in the U.K. with Spinal Cord injury. Views were obtained by publishing proposals in our magazine and website; seeking comment from our membership. SIA's Governing Council members with expertise in transport and mobility issues were also involved.

If you would like your response or personal details to be treated **confidentially** please explain why: N/A

Part 2 - Your Comments

The Department for Transport would like to comprehensively reform the Blue Badge Scheme. Your views are important; background information is available at pages 21-31 of this document to help you answer the following questions:

Eligibility for a Badge

Q1: Do you think that the Scheme's **assessed eligibility** criteria should be brought into closer alignment with that used for the Higher Rate Component of Disability Living Allowance (HRMCDLA) by:

- | | | |
|--|------------|-----------|
| (a) Raising the maximum age that a child can qualify for a badge due to a specific medical condition (i.e. a dependence on bulky medical equipment or the need for emergency medical treatment) from two to three years | Yes | No |
| (b) Raising the minimum age criteria for the main Assessed Eligibility Criteria to three years | Yes | No |
| (c) Enabling people that are severely mentally impaired or who have extremely disruptive behavioural problems to qualify for a badge under the assessed eligibility criteria | Yes | No |
| (d) Lowering the minimum badge issue period (currently 3 years) to: | | |
| i) 1 year; | Yes | No |
| ii) 18 months; or | Yes | No |
| iii) No, keep it as it is (3 years) | Yes | No |

Please explain your reasons or add any additional comments you wish to make (including the conditions that you think should be covered by the revised eligibility criteria):

It is important that there is a consistent standard of eligibility to ensure public acceptance of the need for Blue badges regardless of age, The HRMDLA criteria seem to have this public acceptance. For those not eligible or willing to apply for HMRCDLA, use of criteria as near as possible to those of HRMCDLA would seem to be an appropriate course to take.

Lowering the minimum badge issue period to one year - the reduction in the issue

period to 1 year may be justified to meet the needs of those people whose impairment is not likely to be permanent. Appropriate supporting medical evidence of the anticipated duration of such immobility would be necessary.

Q2: What do you perceive the impact would be of making the above changes on:

(a) The number of people granted badges:

A reduction in badges issued, as local authorities have used many varying standards in the past, particularly for those aged over 65, and these have often been less onerous than those for HRMCDLA holders.

(b) Availability of disabled parking spaces:

There is a shortage of disabled parking spaces, so, if there is a reduction in number, it may encourage local authorities to make better provision if they feel they are not going to be overwhelmed by demand.

(c) Local government administration and costs:

This particular change should not make significant difference except for per capita costs.

(d) Other:

Assessment of assessed eligibility criteria should be done independently of the applicant's GP to avoid undue pressure on the GP.

Concessions Provided to Badge Holders

Please note; there are no current proposals in this area. These questions are purely for debate:

Q3: Do you think that local authorities should have more discretion to vary the yellow line and on-street parking concessions (e.g. allowing badge holders to park without charge for more time in some areas and less in others depending on local traffic conditions and disabled access?)

Yes **No**

Please explain your reasons or add any additional comments you wish to make:

Local Authorities already have power with regard to the placement and time constraints for yellow lines – placing a variable constraint as to the time permitted for parking is not accepted.

The importance of the Blue Badge Scheme is that it is a national scheme and holders travel between local authorities on a regular basis and indeed, for those authorities which try and attract visitors, holders may well come from all over the country. It is difficult enough to find parking spaces in some areas, let alone having the difficulty in trying to determine what length of time is operative on a particular yellow line as well. This could well cause an additional traffic hazard.

It should be remembered that holders engage in the full range of activities that the general public participate in. Hence, their parking requirements – whilst not overriding the general public need - must be recognised. There are needs for visiting in residential areas, shopping, visiting attractions, parking at schools and long term parking for those at work or further education.

Q4: Would you support redrawing the London Concession (the regulations that exempts the four Central London boroughs from the national Blue Badge Scheme) so that it is aligned with the clearly marked, London Congestion Zone – recognising that the zone may alter in size? Yes **No**

Please explain your reasons or add any additional comments you wish to make:

There is no justification for the special conditions in London as existing. In the very few areas where there are particular parking problems it should be the responsibility of local authorities to make affordable parking available in accessible off street car parks. The Congestion zone already covers many areas - particularly south of the Thames – where there are no problems additional to those that are found throughout London. If extended, it will introduce unnecessary restrictions over a still wider area.

If the number of Blue Badge holders drop as a result of tighter criteria for those above 65 years, then this should ease the pressure on parking within the London Concession area, which would support the abolition of this concession entirely.

Q5: Do you have any further suggestions in relation to the future concessions associated with the Blue Badge? Please add any additional comments you wish to make: Yes **No**

Administration and Enforcement

Q6: Do you support the introduction of :

(a) A national framework for sharing Blue Badge data between issuing authorities and with on-street enforcement agencies? Yes **No**

(b) New technology features to the badge e.g. a machine readable badge that can be read by local authority hand held devices? Yes **No**

Please explain your reasons or add any additional comments you wish to make:

Proper and easy enforcement is the key to:

a) public confidence in targeting of the scheme

b) easing the pressure on the limited spaces available

Q7: Do you think that parking enforcement officers should be given a legal power (like the police) to remove misused badges on the spot? Yes **No**

Please explain your reasons or add any additional comments you wish to make:

Without this power, enforcement officers, would have to call upon the police to send a police officer to remove the misused badge. This could hardly be regarded as a good use of police manpower. If it is not removed promptly, it may well be misused again before other processes can be gone through.

Q8: Do you have any other ideas for improving enforcement and/or public understanding of the Scheme?

Those operators of off street parking who recognise the blue badge as entitlement to a disabled parking space, .e.g. supermarkets etc., and who are registered with the local authority, should be able to exercise the same powers as traffic enforcement officers do with respect to on-street parking.

Q9: Do you think that local authorities should be able to charge more than the existing £2 maximum badge issue fee - to more appropriately covers costs? **Yes** **No**

Please explain your reasons or add any additional comments you wish to make:

Costs could be reduced by issuing Blue Badges for the same period of time as HMRCDLA is issued for. This is often for life for those with chronic disabilities. Local authorities could link computers to those of the Benefits agency to ensure that they are aware of the length of time of issue. This would be similar to the way in which DVLA checks entitlement to exempt car licences.

Alternatives and Choice

Q10: Do you have any suggestions for alternatives to the Scheme for meeting the mobility needs of people that do not qualify for a badge (e.g. people with Autism, Alzheimer's, mental health problems, Crohn's or Colitis, learning difficulties and partially sighted people). Please provide your suggestions in the space provided: **No**

Q11: Is there anything else that the Government could do to improve the wider personal mobility of badge holders (e.g. enhanced local taxi voucher schemes)? **Yes** **No**

Please explain your reasons or add any additional comments you wish to make:

To encourage a climate of opinion in the integrated planning process that recognises that the needs of badge holders using personal transport should be recognised as an objective from the start of scheme planning, and not as a nuisance and an afterthought which have to be cobbled on somehow at the end.

Q12: Is there anything that the Government could do to encourage badge holders to use public transport more often? **Yes** **No**

Please explain your reasons or add any additional comments you wish to make:

Recognise that disabled people may need to make journeys by rail without having to give a length of notice that would be unacceptable to the general public.

General Comments

Q13: Do you have any other comments or suggestions for reforming the Scheme? **Yes** **No**

The Blue Badge Scheme must be considered as a national scheme with eligibility based upon standard criteria. Administration of this Scheme could be most effectively undertaken by a central issuing body, working within agreed policies and procedures. This would help ensure consistency, uniformity and equity. The creation of either a new national public sector or voluntary body, or usage of an existing agency, such as the Driver Vehicle and Licensing Authority, linked to the Department for Transport, or the Benefits Agency linked to the Department for Work and Pensions, might provide an appropriate model.

Please send this completed form to:

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The deadline for responses is: **Thursday April 17 2008.**