



**Community  
Transport  
Association**

## **Response to the Welsh Assembly Government**

### **Consultation on Developing a Comprehensive Blue Badge (Disabled Parking) Reform Strategy for Wales**

Closing Date: 2<sup>nd</sup> September 2008

The Community Transport Association

The CTA is a rapidly growing national charity giving voice and providing leadership, learning and enterprise support to member organisations, which are delivering innovative transport solutions to achieve social change. CTA UK promotes excellence through providing training, publications, advice and information on voluntary, accessible and community transport.

Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

The CTA is the representative body for third sector passenger transport operators in the UK. CTA Member organisations are involved in the provision of transport, especially accessible services.

The CTA is the UK's largest provider of training, advice and information on accessible, voluntary and community transport provision. The CTA is part-funded by the Department for Transport, the Welsh Assembly Government and the Department for Regional Development (Northern Ireland).

## **CTA's Response to Consultation**

The CTA welcomes the opportunity to contribute to the Welsh Assembly Government consultation process. After reading through the consultation we have decided to respond on those specific areas that we believe would have a marked effect on our sector.

## **Contact Details**

Any queries regarding this response should be directed to:

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# Consultation Questionnaire: Annex B

Blue Badge Reform 2008 - Consultation Questionnaire and Response Form

## PART 1 - Information about you

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 Company Name or Organisation (if applicable) CTA (Community Transport Association)

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

- |                                                                          |                                                                                           |
|--------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Small to Medium Enterprise (up to 50 employees) | <input checked="" type="checkbox"/> Representative organisation (e.g. disability charity) |
| <input type="checkbox"/> Large Company                                   | <input type="checkbox"/> Trade Union                                                      |
| <input type="checkbox"/> Interest group                                  | <input type="checkbox"/> Local Government                                                 |
| <input type="checkbox"/> Central Government                              | <input type="checkbox"/> Police                                                           |
| <input type="checkbox"/> Member of the public                            | <input type="checkbox"/> Other (please describe):                                         |

Are you a Blue Badge holder? Yes  No

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:

**In Wales, we have over 80 members. We have circulated details of the consultation via our Wales e-forum and highlighted the consultation at our Wales Committee meeting. Also, since CTA UK has been operating the DfT's Blue Badge Helpline for the past year, experience gained from this work has been included in this response.**

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

N/A

## Part 2 - Your Comments

The Welsh Assembly Government would like to comprehensively reform the Blue Badge Scheme. Your views are important; background information is available at pages 21-27 of this document to help you answer the following questions:

### Eligibility for a Badge

<b>Q1:</b> Do you think that the Scheme's eligibility criteria should be brought into closer alignment with that used for the Higher Rate Component of Disability Living Allowance (HRMCDLA) and others by:		
<b>(a)</b> 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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>(b)</b> Raising the minimum age criteria for the main Assessed Eligibility Criteria to three years.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>(c)</b> 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>(d)</b> Revoking the spent eligibility relating to the Invalid Vehicle Scheme (IVS) or "blue trike" scheme - regulation 5(3)(b) This scheme was officially closed on 31 March 2004. Is our understanding correct that the last vehicle was withdrawn in December 2004?	Yes <input checked="" type="checkbox"/> Yes <input type="checkbox"/>	No <input type="checkbox"/> No <input type="checkbox"/>
<b>(e)</b> Lowering the minimum badge issue period (currently 3 years) to:		
i) 1 year;	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ii) 18 months; or	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
iii) No, keep it as it is (3 years)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>(f)</b> Include people with severe congenital disabilities in both arms who are able to drive a vehicle without adaptations to the steering wheel?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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):

**Q1 There is currently an inconsistency where organisations can obtain Blue Badges for their minibuses when used by disabled groups, but a Dial-a-Ride service catering for disabled individuals cannot. This is an anomaly which CTA would like to see changed, since this would enable drivers to drop off/pick up passengers who need help to access the vehicle at shops, hospitals and other venues. Some members who have failed to obtain a badge have been advised that each individual should bring and display their own Blue Badge, but this is patently not a practical solution for a busy DaR service. CTA Cymru/Wales would like to request that such services, catering specifically for the elderly and the disabled, should be allowed an institutional Blue Badge.**

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

**(a) The number of people granted badges: Based on the experience of CTA UK's Blue Badge helpline officer, a large number of enquiries have come from parents and carers of children or adults with autism, enquiring about the availability of temporary badges. This category alone would suggest that making changes would result in a much greater number of badges being issued.**

**(b) Availability of disabled parking spaces: An increase in the number of badge holders would inevitably lead to additional demand for on-street parking. Perhaps consideration should also be given to introducing a legal obligation on the owners of off-street public car parks to provide a proportion of free spaces for Blue Badge holders.**

**(c) Local government administration and costs: No comment**

**(d) Other: No comment**

**Q3: Do you think the entitlement for the scheme should be extended to other disability groups? If yes, why.**

Yes

No

**We would agree with the proposal to extend the criteria to include individuals with mental and behavioural difficulties such as forms of dementia, learning difficulties and autism, since many are unable to travel on their own without support. The current criteria places the emphasis solely on an individual's physical mobility and fails to recognise those who may be physically capable of walking but are unable to walk for much distance, deal with busy traffic or negotiate different or complex routes. Therefore the scheme should be extended to include people who require direction or contact with another person at such times.**

**Q4: What do you perceive the impact will be of making the above change on?**

**(a) The number of people granted badges: Based on the number of helpline calls relating to autism alone that CTA UK has experienced, this is likely to increase**

<b>substantially.</b>
<b>(b) Availability of disabled parking spaces: No comment</b>
<b>(c) Local government administration and costs: No comment</b>
<b>(d) Other: No comment</b>

### The design of the Blue Badge

<b>Q5:</b> Do you think that the design and wording of the blue badge should be changed to aid its use and combat misuse by:		
<b>(a)</b> Introducing a hologram to the front of the badge for security purposes and help reduce forgeries?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>(b)</b> Do you think the additional wording on the front of the badge - "Front - Display this side up" - is necessary?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Will it help those badge holders who are confused about which is the front of the badge?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>(c)</b> Do you see any difficulties in updating the other wording on the badge - i.e. changing the heading on the badge to "Parking Card for Disabled People"?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>(d)</b> Do you see any difficulties in the introduction of male and female markers?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Please add any additional comments you wish to make or explain your reasons for Q5		
<b>(d) Although introducing the male and female markers is a positive step in improving the enforcement of the scheme, difficulties may arise for some people who have changed gender who apply for a Blue Badge and have to supply proof of their identity. Therefore local authorities would need to be flexible in assessing an application made by someone who has changed gender.</b>		

## Concessions Provided to Badge Holders

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

<p><b>Q6:</b> 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?)</p>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<p>Please explain your reasons or add any additional comments you wish to make:</p> <p><b>Allowing local variations is likely to cause confusion as Blue Badge holders are likely to assume that the provisions in their home town apply to other areas. CTA Cymru/Wales is aware that some badge holders are already unsure of what parking conditions apply, therefore allowing variance could well create further misunderstanding and subsequent parking tickets.</b></p>		
<p><b>Q7:</b> 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:</p> <p><b>The current reciprocal agreement with EU countries should be extended to other countries. The Blue Badge scheme does not offer a temporary visitor card, and disabled visitors from other countries experience difficulty in finding out if their card will be valid.</b></p> <p><b>Extending the national concessions of the Blue Badge scheme to include parking concessions in off-street car parks. If it is not possible to extend this to private car parks, then perhaps it could be extended to all local authority car parks.</b></p>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

## Administration and Enforcement

<p><b>Q8:</b> Do you support the introduction of :</p>		
<p><b>(a)</b> A national framework for sharing Blue Badge data between issuing authorities and with on-street enforcement agencies?</p>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<p><b>(b)</b> New technology features to the badge e.g. a machine readable badge that can be read by local authority hand held devices?</p>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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

**No Comment**

**Q9:** 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:

**This would assist swift enforcement by removing the need to wait for a police officer to be present before a badge can be seized.**

**Q10** Do you have any other ideas for improving enforcement and/or public understanding of the Scheme?

**Ensuring that all guidance is written in clear and unambiguous language, and that Local Authorities and car park operators provide clear signage indicating the rules at various points, including near disabled parking bays. Many badge holders assume free parking and do not go to a pay and display machine to check concession information. This could also be backed up with a public information campaign.**

**Q11:** Do you think that local authorities should be able to charge more than the existing £2.00 maximum badge issue fee - to more appropriately covers costs?

Yes

No

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

**CTA Cymru/Wales supports inflation level increases in permits and licences and since the fee has not been changed since 1983, the cost of processing can be higher than the actual fee charged currently.**

**Alternatives and Choice**

**Q12:** 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: **see Q13**

**Q13:** 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:

**CTA Cymru/Wales feels that enhanced and expanded community transport schemes (not just taxi voucher schemes which are mentioned above) could play a key role in meeting the mobility needs of individuals not covered by the Scheme. Both qualitative and quantitative data is showing that the CTCFI demonstration scheme is making a huge difference to the lives of severely disabled people in Wales, since the 15 pilots are providing a bespoke solution to those unable to use conventional bus services, even those which are low floor and wheelchair accessible.**

**Q14:** 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:

**Since the majority of badge holders do not regularly use public transport due to concerns such as accessibility and individual disability and health issues, perhaps the use of community transport could be considered as well. Blue Badge holders may have difficulty getting to bus stops to access public transport in the first instance and perhaps more support could be given for Door-to-Door type services.**

**General Comments**

<b>Q15:</b> Do you have any other comments or suggestions for reforming the Scheme?	Yes <input type="checkbox"/>	No X
Please explain your reasons or add any additional comments you wish to make: <b>No Comment</b>		