



Comments from Imtac on the Department for Transport Blue Badge Scheme: Consultation on Eligibility

March 2018

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About Imtac

Imtac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure.

General Comments

Imtac welcomes the opportunity to comment on the current Department for Transport (DfT) consultation on Blue Badge Scheme eligibility. Although the scope of the proposed changes apply to England only, the Committee feels it is important for it to respond as changes to policy and legislation there are likely to be replicated in Northern Ireland at some point in the future.

Specific Comments on the proposals

The Blue Badge Scheme is extremely important for many disabled people. The parking concessions offered by the scheme are essential to enabling many disabled people to undertake day to day activities non-disabled people take for granted. Although originally targeted at disabled people who experience difficulties with mobility and walking distances, Imtac recognises the potential usefulness of the Blue Badge to other disabled people including people non-physical impairment.

The Committee welcomes the debate created by the consultation about extending the benefits of the Blue Badge Scheme to more people who have a non-physical impairment. Locally Imtac is aware that the Department for Infrastructure demonstrates flexibility under the “with further assessment” criteria to enable some people with hidden or non-physical impairments to obtain a Badge. However proposals from the DfT would take this a stage further, formalising this eligibility through changes to the legislative basis of the Scheme, extending automatic eligibility criteria and changing the assessment process under the “with

further assessment” criteria. It could be argued that making such changes is the only way to ensure that future applications for the Blue Badge are treated in a consistent, fair and equitable manner.

Balanced against this is the recognition in the consultation of the potential impact of increased numbers of Blue Badges. Parking is a finite resource and increasing numbers of Blue Badges will increase the competition for a limited numbers of spaces. Closely linked to this, and not fully recognised by the consultation is current guidance on the provision of accessible parking, requiring around 5 to 6% of parking provision to be accessible. This guidance is based on the assumption of eligibility based on disabled people who have physical impairment and not the broadened eligibility created under the consultation proposals.

Imtac believes there is a significant risk that in broadening the eligibility for scheme without also addressing the existing provision of parking, DfT may create a situation where disabled people (both existing and new Badge holders) are competing for limited parking opportunities and are increasingly frustrated by a Scheme which offers important parking concessions but which people find increasingly more difficult to use.

For an organisation such as Imtac it is vital that the Blue Badge Scheme is sustainable in the longer term and most importantly disabled people who are eligible continue to benefit from the concessions it offers. The Committee believes it is impossible to endorse the proposals contained in the consultation without further evidence of the impact of the proposals on the Scheme. The Committee is disappointed that the Department has not undertaken this work in advance of the consultation, committing only to look at issues around increased numbers of Badges and existing parking provision once decisions of future eligibility are taken.

Before final decisions are taken on extending eligibility to the Scheme, Imtac recommends DfT undertake a thorough assessment of the impact of the proposed changes. The assessment should include (1) a clear estimation of the number of additional Badges likely to be issues as a result of the changes, (2) an assessment of the impact increased numbers of Badges on existing parking provision and disabled peoples experiences of using the Scheme, and (3) an assessment of the ongoing

relevance of current guidance on the provision accessible parking in light of extended eligibility.

Conclusion

Imtac is a committee of disabled people and older people and as such is committed to acting in the best interests of all the people we represent. On a simple level the Committee has no issue with supporting proposals to extend eligibility to parking concessions to more disabled people. However the Committee must also be satisfied that in future the Blue Badge Scheme will be sustainable and continue to deliver benefits to all its users. In the absence of a detailed assessment of their impact, Imtac cannot fully support the current proposals from DfT. The Committee recommends that DfT undertake such an assessment before making final decisions on the current proposals.