

**Annex: Surrey County Council's Response to the Department for Transport
Blue Badge Scheme: Consultation on proposed changes to eligibility criteria**

Surrey County Council (SCC) is a local authority that serves approximately 1.1 million residents and is responsible for administering the Blue Badge scheme for the county of Surrey. SCC welcomes the opportunity to respond to the Department for Transport's (DfT) consultation on proposed changes to the eligibility criteria for the Blue Badge scheme. We respond to the questions contained within the response document as well as providing some additional comments.

Question 1: Affected numbers

The Blue Badge scheme is a well-used and valued service in Surrey with approximately 44,000 current Blue Badge holders and an average of 1300 applications received for a Blue Badge each month. Approximately one third of Blue Badge holders in Surrey are over 80 years of age.

Demographic data for the county suggests that 13.5% of Surrey's population are identified as being limited by a long term health problem or disability. This would equate to approximately 148,500 people being potentially eligible for a Blue Badge. Surrey's population is growing and their needs are becoming more complex, increasing demand on health and social care services. The projected rise in the adult population in Surrey (nearly 240,000 adults aged over 65 by 2021) is already expected to increase demand for the Blue Badge service without any change to the existing eligibility criteria.

While a range of non-physical disabilities are considered in considering eligibility for a Blue Badge at present, current eligibility is, in the main, focused around those with a permanent and substantial disability which causes inability to walk or very considerable difficulty in walking. It is the effect of someone's disability or medical condition on their ability to walk that is important. Changing the criteria to also include persons unable to undertake any journey without there being a risk of very considerable harm to the health and safety of that person or another person; and persons unable to follow the route of any journey without another person, assistance animal or orientation aid, is likely to significantly increase demand for the Blue Badge service within the county as it will cover a wide range of disabilities and medical conditions.

It is difficult to predict exact numbers of people that may become eligible under the proposed change in criteria but some figures on the conditions that are likely to be included within the amended criteria gives an idea to the predicted increase in demand and applications the council is likely to receive. There are an estimated 16,472 people in Surrey with dementia; 9,728 with an actual diagnosis. Research suggests that if current trends continue and no action is taken the number of people in the UK with dementia will rise significantly. In Surrey the number of people with dementia is predicted to rise to 21,075 by 2025. Approximately 9,200 adults in Surrey are autistic and, of these, 1,000 access adult social care services. 21,800 adults in Surrey have learning disabilities, of which 4,665 are aged over 65. There are also 6,800 children in Surrey with special educational needs and disabilities (SEND) on a statutory plan. There are a number of other mental health conditions that may impact a

person's ability to undertake a journey, for example severe depression. It is estimated that by 2020 there will be approximately 20,500 adults in Surrey over the age of 65 (a key demographic for Blue Badge applicants) with depression; 6,608 of which will have severe depression.

The maximum cost that local authorities can charge for issuing a Blue Badge is £10. The average standard cost of issuing a Blue Badge has been estimated by the DfT at £22. When a mobility assessment is required to assess a person's eligibility, the cost of issuing a badge rises. Local authorities are currently required to fund any costs over and above the income they receive from the £10 fee, which includes all costs for mobility assessments. In Surrey the current operational cost of administering the Blue Badge scheme is approximately £214,000 per annum. There is an additional cost of approximately £40 for each mobility assessment carried out, which adds an additional cost of £40,000 - £60,000 per annum. Income levels from the £10 fee are around £140,000 per annum. Given the wide-ranging, varied and complex nature of the conditions that could potentially be covered under the proposed change to the eligibility criteria, it is anticipated that the need for independent assessments / expert opinion would significantly increase, which would in turn increase the assessment costs local authorities would be required to fund. Overall, including the cost of additional assessments and additional staff (estimated 2.5 FTE) to help manage higher demand and to continue to meet our 4-6 week target for issuing Blue Badges, it is projected that the cost of administering the scheme in Surrey could potentially double to around £400,000 per annum.

Question 2: Proposal for expanding the eligibility criteria – Do you agree with the proposed new criteria?

SCC is in principle supportive of initiatives that make it easier for carers and vulnerable people to live as independently as possible, as well as parity in the treatment of physical and non-physical disabilities. We are committed to protecting the vital services our residents rely on but this becoming increasingly challenging. We have seen an unprecedented demand for services and a significant reduction in government grants. Government would need to recognise the additional demand this change to the eligibility criteria would create for local authorities who are responsible for administering the scheme to ensure it is fully funded and that local authorities are not left in a position where they are incurring significant additional cost.

We have heard directly from residents how much they value the Blue Badge scheme and we recognise the importance the scheme has in supporting independent living. We believe any change to the eligibility criteria needs to clearly reflect and support the original aim of the scheme; only those with severe or permanent conditions (whether physical or non-physical) that impact their mobility - meaning they have a specific need to park close to their destination to access goods, services and other facilities - should be eligible. We do not want to undermine the value, or purpose, of the Blue Badge scheme.

We would want to make sure that any changes to the application and assessment process benefit the customer and are not overly bureaucratic. We anticipate likely challenges around assessing eligibility, differences in interpretation of eligibility wording and the potential for an increased number of enquiries, challenges and appeals. Clear and unambiguous government guidance would be needed to ensure application and eligibility assessment processes are fit-for-purpose, that applications are assessed fairly and consistently across the country and that decision-making can stand up to scrutiny. There would particularly need to be clear guidance around when an expert opinion is required in terms of assessing eligibility. SCC would welcome the opportunity to engage with the DfT to shape such guidance.

There is significant concern about the impact a higher number of Blue Badge holders would have on dedicated parking provision in Surrey. The county already experiences significant parking pressures which are a very real concern for residents and has, for example, only 3,000 disabled parking bays for the current 44,000 Blue Badge holders in the county. Other local authorities have implemented parking charges for Blue Badge holders in council-owned car parks and this may be something that needs to be considered to generate necessary revenue.

Higher numbers of Blue Badge holders are likely to create additional road safety concerns with their ability to be able to park on double yellow lines, which are most often installed for safety reasons. There are serious concerns about whether this practice is appropriate in areas such as Surrey with a high volume of traffic on its roads, which is steadily increasing. SCC is strongly of the view that this is not a sustainable practice and that Blue Badge holder parking concessions will need to be reviewed prior to any change to eligibility taking place in order to address potential road safety issues, access to parking and the impact on traffic flow.

There is also concern that higher numbers of Blue Badge holders could lead to higher levels of misuse, which the local authority would need address, as well as thefts which have increased nationally by 14% over the past twelve months. This would also have resource and cost implications for local authorities.

Question 3: Eligibility Assessor – do you agree that where an expert opinion is required it should be required by an eligibility assessor?

SCC would support the use of eligibility assessors to help determine eligibility, crucially the impact of complex non-physical conditions such as dementia and mental health conditions on a person's mobility and their ability to undertake journeys. Council officers would not have the necessary expertise to make desktop based eligibility assessments for conditions such as dementia and autism, in the same way that can currently be carried out to establish the level of a person's mobility.

Representative groups in Surrey have been clear that where an expert opinion is required it should be provided by an expert in the appropriate field and SCC would support this. This will, however, have significant implications for how we currently commission eligibility assessments for Blue Badge. We would require a range of specialist assessors covering a wide range of conditions and assessments are anticipated to require greater resource and be far more challenging, particularly around mental health. We anticipate a much higher percentage of future applicants requiring assessments given the complexity of conditions potentially covered by the proposed change to eligibility. This will have significant cost, commissioning and training implications for the local authority which currently meets the full cost of assessments. As stated above, clear guidance around when an expert opinion is required in terms of assessing eligibility will be vital and eligibility questions will need to be carefully framed to make the application and assessment process as simple as possible for customers. Some customers have advised that they find being sent for a mobility assessment intrusive. Due consideration should be given to advice already provided by appropriate medical practitioners and specialists to help inform the decision-making process where appropriate.

Question 4: Linking to Personal Independence Payment (PIP): Do you agree that there should be automatic badge eligibility for people with non-physical disabilities who score 12 points under the PIP activity – Planning and following journeys?

SCC believes that this would be a sensible and consistent way to assess automatic eligibility and would put England in line with Scotland and Wales. These applications would be quicker

to assess leading to a quicker and more effective service. If set at 12 points, this would mean a person has a clear and demonstrable need for disabled parking.

Representatives of disabled groups in Surrey have suggested that 12 points as a threshold is too high and 10pts may be a more appropriate alternative.

If linking to PIP, both components - 'planning and following a journey' and 'moving around' – should be considered to ensure the mobility component is reflected.

Question 5: Equality Impact: Do you believe the proposals would disadvantage any particular group of disabled people?

In terms of expanding the eligibility criteria:

Those people who simply have difficulty walking / are unable to walk may experience difficulty parking due to parking spaces being used up.

In terms of linking to PIP:

Not everyone wants, or is able, to claim benefits.

Both components 'planning and following a journey' and 'moving around' – should be considered.

Question 6: Final Comments

In England and Northern Ireland the current maximum charge that can be levied for issuing a Blue Badge is £10. In Scotland, the maximum a local authority can charge is £20. In Wales there is no charge as the Welsh Government provides funding to local authorities to cover the cost of the Blue Badge through the Revenue Settlement Grant. In order to cover the anticipated increase in operating costs if the new eligibility proposal goes ahead, consideration should be given to government providing additional funding appropriate to the anticipated higher demand for the scheme under the new proposals. Alternatively, consideration should be given to increasing the maximum amount local authorities in England can charge to issue a Blue Badge to enable greater income generation to cover costs.

SCC would reiterate our commitment to supporting our most vulnerable residents and emphasises the need for government to recognise the potential cost and resource implications this proposal could potentially have for local authorities administering the scheme; the need for clear guidance around eligibility which should be closely linked to the core purpose of the Blue Badge scheme; the need for clarity around when expert opinion should be sought and the potential negative impact an increased number of Blue Badge holders could have in areas like Surrey, which has existing pressures on dedicated parking provision and where it is already difficult to access parking concessions due to the number of Blue Badges already in circulation.

SCC would welcome the opportunity to work with the DfT to help shape any future amended guidance should the proposed change to the eligibility criteria be agreed.