



York Civic Trust

Transport Advisory Group
Consultation on blue badge parking
The Trust's response
6th August 2021

We are responding to the Council's consultation on changes to blue badge parking and access in the city centre.

We welcome the Council's decision to make permanent the temporary extensions to the footstreet area to include Blake St, St Helen's Square, Lendal, Goodramgate, Church St, King's Square, Colliergate and Castlegate. We would prefer to have seen Fossgate included, and encourage the Council to take action soon to resolve the future use of this street. However, it is essential, in the interests of equality, that those who are adversely affected by these restrictions are provided with appropriate alternatives.

In our proposed strategy on improving walking, submitted in April 2021 as part of our invited input to the Council's next Local Transport Plan, we addressed this issue as follows:

"We would like to see the recent extensions to the footstreet network retained, with priority given to providing a continuous surface on streets which still have kerbs. To avoid pavement damage, an appropriate low weight limit should be applied for all access to the area. Access needs to be retained for those who are most disabled, and we recommend the introduction of a green disability badge to allow them to pass automatically enforced access points, and with parking provided where it does not disrupt pedestrian movement. We suggest that the Council investigate the possibility of a small electric vehicle to permit those who are less disabled to access all parts of the area. We would like to see groups of seats provided at least every 50m throughout the area, and the Council promote the Take a Seat initiative to extend the provision of toilet facilities. We propose that a clearly demarcated cycle route be provided east-west and north-south through the city centre on suitably wide streets, and that the same design be adopted in Minster Yard. In addition, cargo bikes, but not couriers, might be permitted in other wider footstreets. Enforcement action should focus on removing vehicles not permitted to access or park within the footstreet network. If the Council does pursue its proposed anti-terrorism measures, they should be located around the periphery of the extended footstreet network."

It is in this context that we are responding to the current consultation.

The key issue in the consultation is the proposal permanently to ban blue badge parking during footstreet hours (1030 to 1700) in all the streets listed above, and to replace them by designated additional blue badge parking in Duncombe Place, Deangate, St Andrewgate, St Saviourgate, Carmelite St and Dundas St. No indication is given of the total number of spaces which would thus be provided; we estimate it to be around 25, or which seven would be shared with loading and are thus unlikely to be available for much of the day. Equally, no indication is given of the number of spaces lost, or the additional distance required between the new and pre-existing spaces. Our own estimates are as follows:

- For the spaces lost in and around St Helen's Square, the only relevant spaces will be three in Duncombe Place and a further seven shared with loading; they are some 200m from St Helen's Square.
- For the spaces lost in Goodramgate, Church St, King's Square and Colliergate, there are some 15 spaces provided; some of these are within 100m of the lost spaces, but seven are over 300m away and require disabled users to cross Stonebow.
- For the spaces lost in Castlegate, it appears that no attempt has been made to offer any alternative provision.

As the (undated) review for the Council by Disabled Motoring UK makes clear, those with disabilities are not a homogenous group of users. Some can walk or wheel themselves for longer distances, provided that hazards are removed; others are unable to move for more than a few metres without resting. As the Chartered Institution of Highways and Transportation recommends in its Guidelines for Reducing Mobility Handicaps, the maximum distance which disabled users are required to walk or move without a rest should be 50m for stick users, 100m for ambulatory disabled users without a walking aid, and 150m for the visually impaired and those in wheelchairs. At the same time the Guidelines note that up to 20% of people with the most severe mobility handicaps will not be accommodated even by this level of provision. It is clear to us that virtually none of the Council's proposed replacement blue badge parking spaces satisfy these requirements, even as far as to allow disabled users to reach the spaces in which they previously parked. **On this basis we recommend that the proposals should be rejected as being inadequate in meeting the needs of designated blue badge users, and deferred until effective alternatives are available.**

We fully accept that it will be difficult to find a sufficient number of replacement spaces within these distances of the footstreet network. As we see it, the only appropriate approach is to offer a range of alternatives, and check through an Access Audit that between them they meet the range of needs of disabled users. We envisage these including:

1. a possible exemption for blue badge users up to, say, 1200;
2. a green disability badge to allow those who are most severely disabled to pass automatically enforced access points;
3. all parking provided for (1) and (2) restricted to designated bays where it does not disrupt pedestrian movement;
4. appropriately designed designated spaces in public car parks further away, with clearly marked and designed access routes;
5. a small, low-speed electric shuttle bus between a pair of these car parks, serving the core of the city centre;

6. a 10mph (or ideally lower) speed limit imposed on all users of the footstreets at all times of day;
7. permitting designated disabled cyclists to use the wider footstreets throughout the day;
8. an enhanced shopmobility scheme, bearing in mind that the current one in the Coppergate car park is judged unacceptable by many disabled users;
9. groups of seats provided at least every 50m throughout the footstreet area to satisfy the CIHT recommendations;
10. promotion of the Take a Seat initiative to extend the provision of toilet facilities.

We note that many of these recommendations are included in the report commissioned by the Council from Disabled Motoring UK. We also note that they recommend the appointment of an Access Officer and the commissioning of an audit of accessibility. We are concerned that no attempt appears to have been made to respond to any of their recommendations.

In conclusion, we strongly endorse the Council's decision to extend the footstreet network, given the benefits which it offers to pedestrians and to city centre economy and environment. We would like to see the Council commit to providing a continuous surface on streets which still have kerbs, and to implementing an appropriate low weight limit for all access to the area. However, these benefits should not be gained at the expense of those who are most disabled, and in many cases most disadvantaged.

To this end, we recommend that the proposed restrictions on blue badge access should be deferred until a Disability Access Officer has been appointed, disability awareness training provided to all relevant Council staff, an effective accessibility audit conducted, the range of solutions listed above appraised, and clear evidence presented that those no longer able to use blue badge spaces are being offered effective alternatives.

We would be happy to assist the Council in implementing these recommendations.