

APPENDIX 3 REPORT OF PUBLIC CONSULTATION MEETINGS

Meetings Held with People with Learning Difficulties		
<p>June 11th 2012 – Rosa Morison Day Centre – attended by 2 Carers, 2 Day Services staff, 3 LBB Officers</p> <p>June 13th 2012 – Flower Lane Day Centre – attended by 1 Service user, 7 Carers, 3 LBB officers, Your Choice Barnet Centre Manager, 1 bus driver</p> <p>June 26th 2012 – North London Business Park – attended by 1 Carer, 4 Day Services staff, 2 LBB officers</p> <p>June 29th 2012 - North London Business Park – attended by 3 Carers, (SG) Barnet Mencap, 2 Day Services staff,</p>		
Proposal	Feedback	Response
Introduction of Eligibility Policy	<p>The main concerns were that those with People with Moderate Learning Disabilities (PMLD) or severe LD issues would lose their transport and the ability to attend day opportunities</p> <p>Questions were raised about the eligibility assessment, who would perform it, and how clients' eligibility would be decided.</p> <p>Some carers and Your Choice Barnet staff also raised concerns that the proposal would ultimately lead to an increase in cost for the council as carer breakdowns increased and service users needed to move to residential settings.</p> <p>During the meeting at Flower Lane one carer stated that he did not agree with the proposals and in any event, the council would take no notice of the responses anyway.</p> <p>At the meeting at Rosa Morison, a carer stated that she felt that the disabled were constantly being targeted for</p>	<p>Clients were reminded that those with PMLD and severe cognitive issues and no other suitable means of transport were very likely to still be eligible for LBB transport. This reassurance was given a number of times, and seemed to be generally accepted.</p> <p>The full assessment tool is not yet available but clients were reminded of the criteria as laid out in the consultation document. In addition, it was stated that LBB staff may undertake the assessments or Your Choice Barnet staff or the assessments may be performed by an external provider. The benefit to individuals of being enabled to travel independently (even if only to a single location) was emphasised several times. There was general agreement at the meetings that this would be a good outcome for those that could travel on public transport with/without support, but most felt that the level of disabilities of most current transport users would mean that most would be eligible under the policy and would continue to qualify for Council-funded transport.</p>

	<p>cuts to their services, despite being some of the most vulnerable in the community.</p> <p>Most opinions voiced at the meetings were that the eligibility policy should not be implemented, although there was agreement that those that could travel by other means should do so. It was felt that the opportunity to travel by another means should be optional as anything else would increase the burden on carers, many of whom also had disabilities.</p>	
<p>Independent Travel Training (ITT)</p>	<p>Most agreed with the idea in principle but some carers and day services staff expressed strong reservations and felt that most current council-funded transport users would be unable to attain a level of competence that would enable them to travel safely.</p> <p>In addition, it was repeatedly mentioned that many of these clients had physical disabilities as well.</p> <p>Concerns were expressed over the length of time that it would take to train a client and whether there would in fact be any financial benefit to the council as a result, particularly where clients had been trained sufficiently but still felt unable or were unwilling to travel independently.</p> <p>Your Choice Barnet staff stated that they provide travel training for suitable clients, but in their opinion, the council underestimated the timescales required for this to be effective. An example was given of a client who had been receiving travel training for over 3 years.</p>	<p>Independent Travel Training is being promoted as an offer to those that are willing and able – and those not eligible to use the minibus - to gain the confidence and skills required to travel independently (or with support) by public transport.</p> <p>No one will be forced to undertake Independent Travel Training. It is not envisaged at this time that anyone that does complete the travel training will be forced to travel independently, nor will anyone be encouraged to do so if significant concerns regarding their safety remain after completing the Independent Travel Training.</p>

	<p>Your Choice Barnet staff also stated that – in relation to the potential procurement of Independent Travel Training by the West London Alliance – that they would like further information if/when a tender process is to be undertaken.</p> <p>Overall, it was agreed that Independent Travel Training would be beneficial, even if only for a limited number of clients.</p>	
<p>Introduction of a £10 charge for Blue Badges</p>	<p>Most attendees thought that the charge was reasonable, but a minority felt that it would be an additional strain on those already struggling with rising care costs.</p> <p>Questions were: why is the charge being introduced? Would the London Borough of Barnet still have the charge if other boroughs did not? Would it be an annual payment?</p>	<p>The charge is being proposed in response to increased costs for the council in Blue Badge administration as a result of the Blue Badge Improvement Scheme (BBIS).</p> <p>Most other boroughs have already implemented the maximum £10 charge and the remainder were considering it.</p> <p>The charge would be levied upon application, or renewal of an existing badge.</p>
<p>Withdrawal of LBB Travel Voucher Scheme (TVS)</p>	<p>A number of attendees stated that they knew very little if anything about the Travel Vouchers Scheme (TVS).</p> <p>Most attendees agreed with the proposal to withdraw the scheme. However, feedback received from users of the travel vouchers was strongly against their withdrawal.</p> <p>The Taxicard was seen by many as a less reliable and less user friendly service that often was late or failed to arrive to collect clients.</p> <p>Additionally, the Taxicard service was felt to be more expensive overall, despite providing clients with a far</p>	<p>Very few people - less than 100 currently - make use of the council's Travel Voucher Scheme.</p> <p>London Council's Taxicard, offers a scheme that is as good as, or better than the Council's Travel Voucher Scheme.</p> <p>If the proposal is agreed the council will help people apply for a Taxicard from London Councils.</p> <p>The significantly higher subsidy available through the Taxicard scheme compared to that offered by the TVS was explained</p>

	<p>great level of subsidy and more journeys. Many appreciated – and preferred - the ability to pay for an entire journey in vouchers under the London Borough of Barnet scheme.</p> <p>Some attendees felt the Taxicard scheme was too complicated, and that there would be issues for the clients in making bookings and using the card.</p>	<p>It was mentioned that whilst some boroughs do allow “double swiping”, there were as yet no plans to allow this for LBB residents.</p>
<p>Criteria for disabled parking bays at the home of residents</p>	<p>There were no objections to this proposal from these clients.</p>	
<p>Meetings with People with Physical and Sensory Impairment</p>		
<p>June 25th 2012 – Barnet House - 1 service user and spouse (carer), Day Service Manager, 2 BSL interpreters June 27th 2012 – Barnet Independent Living Service - c30 service users and carers, 4 day services staff July 4th 2012 – Barnet Independent Living Service - 5 service users, 4 day services staff</p>		

Proposal	Feedback (verbal)	Response
<p>Introduction of Eligibility Policy</p>	<p>The service user that attended the first meeting agreed with the proposal. She hoped to still be eligible as her mobility issues and other disabilities would prevent her from travelling alone. She uses a large wheelchair and would not be able to get it on to public transport.</p> <p>She also makes use of a regular Dial-a-Ride service and only uses LBB minibuses twice a week.</p> <p>She said that although she does have a Motability vehicle, it was not always possible for her husband to take her everywhere as he works and may or may not use the vehicle to get there.</p> <p>There is no-one else that can drive for her.</p> <p>At the other meetings people wanted to know why the Council was undertaking the consultation in this manner as most of the service users would</p> <ul style="list-style-type: none"> a) not be able to understand what was being asked of them and b) be eligible for LBB transport based on mobility alone <p>People also felt that it would be better to hear the views of day services staff who know the clients and their circumstances.</p> <p>It was felt by some that the consultation exercise was simply about ticking boxes.</p>	<p>It was explained that the meetings were being conducted to discuss the proposals face-to-face with people who would be affected by them, to explain the points that people found difficult to understand and to provide additional information that people might want to hear about the proposals. Hearing the views of service users was an essential part of the process for the council to consider the case for change.</p>

Independent Travel Training (ITT)	<p>Questions were raised about the safety of clients after completion of travel training, and about the risk assessment of journeys before, during and after Independent Travel Training had been undertaken, and the practical aspects for people with walking aids.</p>	<p>Reassurance was given that any Independent Travel Training would be fully risk assessed. It was also stated that Independent Travel Training journeys would aim to be as simple as possible, with a limited number of changes required.</p> <p>The issue of client safety after Independent Travel Training would be a matter of the client using their new skills to remain as safe from harm as they possibly could, i.e. staying close to the driver, remaining seated downstairs, not engaging in conversation with strangers, and being aware of other dangers, identifying authority figures to request assistance, etc. These were key elements of effective Independent Travel Training</p>
Introduction of a £10 charge for Blue Badges	<p>Most attendees thought that the charge was reasonable.</p>	<p>Some boroughs have already implemented this charge and others were considering it. The consultation document explained that the cost to the council of issuing the badge is £20 and therefore the charge of £10 represents a contribution of just one-half of this cost.</p>
Withdrawal of LBB Travel Voucher Scheme (TVS)	<p>PSI clients on the whole were not users of the Travel Voucher Scheme and so voiced very few comments either way on the proposal. The general consensus was that if the Travel Voucher Scheme was not working for people it should be stopped.</p> <p>However, some people felt that Travel Voucher Scheme users may have difficulty understanding the Taxicard scheme and how to use it.</p> <p>However feedback from attendees was that Taxicard</p>	<p>At the meetings London Borough of Barnet explained that Travel Voucher Scheme users (and others) would be supported to apply for the Taxicard scheme.</p>

	fees were higher than private hire vehicles so that even when subsidised the overall cost is higher.	
Introduction of tighter criteria for disabled parking bays at the home of residents	<p>This proposal received the most support during the meetings.</p> <p>The main concern raised was that there would now be fewer disabled bays for the general public. The Council were asked whether it would provide additional unrestricted bays</p>	The Council advised that it would replace bays lost by this proposal, where there is strong evidence of unmet demand for disabled parking provision

Meetings with Older Adults		
<p>July 3rd 2012 – Meadowside July 10th 2012 – Rosa Freedman July 12th 2012 – Apthorp Lodge</p>		
Proposal	Feedback (verbal)	Response
Introduction of Eligibility Policy	The clients generally felt that an assessment process would be fair, but expressed concerns about a lack of clarity concerning costs that may be levied upon clients resulting from the proposal if they were required to pay for their own transport. A query was raised about whether there would be the opportunity to pay (using a personal budget or other means) to remain on the LBB vehicles.	The Council agreed to consider the possibility of allowing people who were assessed to be ineligible to nevertheless pay the full cost in order to continue to use the minibus service.

Independent Travel Training (ITT)	Independent Travel Training was seen as a sensible idea.	It was explained that Independent Travel Training could be an option for anyone that wished to take it up and not just those who were using council-funded transport. During meetings attendees were reassured that no one would be forced to have Independent Travel Training and that independent travel options would be risk assessed to ensure safety and suitability.
Introduction of a £10 charge for Blue Badges	<p>This was generally seen as a reasonable idea although there were a small number who felt that £10 was too much.</p> <p>People attending the meetings were supportive of more stringent tests, to ensure that badges were only issued to those who genuinely required them.</p>	The consultation document explained that the cost to the council of issuing the badge is £20 and therefore the charge of £10 represents a contribution of just one-half of this cost
Withdrawal of LBB Travel Voucher Scheme (Travel Voucher Scheme)	People were generally unaware of the scheme but felt that if it was not working, it should be stopped.	Taxicard gives a higher subsidy per journey than Travel Voucher Scheme. A £15 journey with Travel Voucher Scheme would cost a client £8.40 and a similar journey with Taxicard would cost £6.70.
Criteria for disabled parking bays at the home of residents	<p>This proposal received the most support during meetings with all clients.</p> <p>The main concern raised was that there would now be fewer disabled bays for the general public.</p>	The Council advised that it would replace bays lost by this proposal, where there is strong evidence of unmet demand for disabled parking provision

Physical and Sensory Impairment Partnership Board – 11 May 2012 (17 attendees)

It was agreed in discussion of the Council's presentation that the points below would be reported as the Board's feedback on the

Proposals:

- It is important to retain taxi vouchers as many older people and people with disabilities do not use cars, and to ensure that these can be used with local cab services;
- Some members expressed dissatisfaction with the service they had previously received when using the Taxicard;
- It would be helpful to look at subsidising fares for carers of people who would like to travel by bus;
- When giving people training to travel independently, it will be important to recognise that the most vulnerable people will find this difficult and may need ongoing support;
- With regard to the proposal to charge £10 towards a Blue Badge parking permit, a suggestion would be to charge those who can afford it, but not those who cannot;
- There was support for the travel training proposal, although it was mentioned by members that some clients would still need support, even after the training had been completed.

Learning Disabilities Partnership Board – 23 May 2012 (20 attendees)

Following officers' presentation of the Proposals, it was agreed that officers should attend the Day Opportunities and Community Inclusion Subgroup's meeting to discuss the plans and take members' comments.

Due to time constraints, there was no further discussion at this meeting.

LDPB Day Opportunities and Community Inclusion Subgroup – 30 May 2012 (7 attendees)

The main area of concern in response to the Council's presentation of the Proposals concerned the implications of the eligibility policy proposal for people aged under 25 and attending colleges either by taxi or by minibus. A majority of these clients are under the care of the Childrens Service, which pays for their costs. The main question raised was, would these people still get LBB transport to their destinations once they are over 25 and become ASCH clients?

In response, the LBB representative stated that the Proposal was that each individual would be assessed in accordance with the eligibility policy.

No points were raised concerning any of the other proposals.

Learning Disabilities Parliament – 18 July 2012 (8 attendees)

In response to the Council's presentation of the Proposals, there was general agreement that the eligibility policy was acceptable in principle and that the other proposals were also generally acceptable subject to the following comments:

- The Council were carrying out too many consultations;
- Consultations should be carried out over a longer period. 5-6 months rather than 3 months would allow sufficient time to allow information to be disseminated and for people to form ideas and be assisted to respond;
- Cuts are continually being made to services for disabled people;
- Concerns were expressed about cognitive behaviour being included in the adults eligibility assessment;
- Some members were unaware of the existing Travel Voucher Scheme;
- The value of the Taxicard was questioned, as some people noted that Barnet is a very large borough and to travel it across by taxi may cost upwards of £20-£30. Such costs may make taxis entirely too expensive for some clients and cause them to feel more isolated. Some clients can / will only travel as far as the distance covered by the subsidy, before switching to public transport for some journeys.

Mental Health Partnership Board – 19 June 2012 (17 attendees)

The following comments were made in response to the Council's presentation of the Proposals:

- Concern was expressed that the stress of an eligibility assessment could aggravate a service user's condition. There was a risk that people would seek to avoid an assessment;
- It was noted that a key question to be asked in assessment is whether it is safe for people to travel independently. It was emphasised that safety is not just about people having the ability to use transport: it is also about people being safeguarded from risks people might experience in using public transport eg hate crime;
- It was noted that very few mental health service users had received travel training and the Council would need to clarify whether the training will be available to everyone, or restricted to those who received a Council-funded transport service. It was hoped that travel training would be actively promoted through Barnet Centre for independent Living (BCIL), and through the CPA process;
- It was suggested that it would be best to increase people's access to services rather than reduce it. It was noted that some

current Freedom Pass holders would benefit from travel training;

- It was pointed out that it is important for travel training to be accessible, and that the hours when it is provided should meet the needs of Mental Health service users;
- A question was asked concerning the proportion of disabled parking bays in Barnet that were located outside residents' homes. Officers agreed to provide information on this to the Board.

Older Adults Partnership Board – 19 July 2012 (19 attendees)

The following comments were made in response to the Council's presentation of the Proposals:

- Concern was expressed that although transport was raised as key to the Ageing Well Programme and to re-shaping day opportunities, the connections between this consultation and the wider picture of services for older people had not been clearly made;
- Older people and disabled people should have maximum opportunity to engage in preventive measures and to 'be a part of the world' but reducing transport services will cause some people to suffer by restricting their lives. It was acknowledged that transport does involve a significant cost, and it was suggested that debate is needed about this, whereas the consultation document appears to present details of decisions the Council has already made;
- With regard to the proposal to withdraw the Council's Travel Voucher Scheme, the view was expressed that London Councils' Taxicard service would be an adequate alternative only for very local journeys;
- It was suggested that as most door-to-door transport is used for travel to and from day centres for people assessed as having substantial or critical need for social care, it is unlikely that many would not also be assessed under the proposed eligibility policy as having a need for transport. However, it was also noted that the eligibility criteria included consideration of whether people have other transport options that they could use to get to day centres;
- It was stated that day centre users do not currently automatically get transport and that a conversation already takes place around for example whether the person had access to private transport;
- It was agreed to hold a further meeting for interested Board members to develop their consideration of the proposals.

Older Adults Partnership Board – Special Meeting on 31 July 2012 (3 attendees)

- Concern was expressed about the lack of opportunity for input to the consultation document by the Partnership Board and other stakeholders, and the perception that the Council was informing stakeholders about cuts that would be made, rather than asking for input that may result in changes to the proposals;
- There was a feeling that the proposals would go ahead irrespective of the feedback;

- It was recommended that the consultation be repeated and the consultation documents be revised;
- It was also suggested that the Council should have fewer consultations, as the number of forms people were being asked to complete was becoming too many, resulting in some people becoming disengaged;
- Concern was expressed about the new Blue Badge application process, namely that clients are told that they must / can only apply online, but are then requested to confirm ID by taking actual documents to a local council office;
- There was an issue raised regarding applications for organisational Blue Badges, in that the system requires a vehicle registration number to be provided, despite the fact that Blue Badges are supposed to be portable.

APPENDIX 4 UTILISATION OF ADULT PASSENGER TRANSPORT PROVIDED BY ADULT SOCIAL CARE AND HEALTH

	Number of Day Centre Users	Minibus Users	Regular Taxi Users
Learning Disabilities			
Flower Lane	49	32	2
Rosa Morison	52	44	
CommunitySpace	46	38	2
Other day opportunity services			14
Older Adults			
Apthorp Lodge	58	56	
Meadowside	68	62	
Rosa Freedman	132	118	3
Physical and Sensory Impairment			
Barnet Independent Living Service*	39	25	
Total Number of Users	444	375	21
Total 2011/12 Expenditure		£ 818,033	£ 220,106

* There were 39 service users using BILS at 30.6.2012. Four of these were volunteers who needed support to volunteer, therefore counted as service users. The latest figures over the last actuals period up to the 24 September is showing 34 service users for 1 day or more.

APPENDIX 5 - PROPOSED ELIGIBILITY POLICY FOR ADULT PASSENGER TRANSPORT PROVIDED BY ADULT SOCIAL CARE AND HEALTH

West London Alliance - Proposed Common Policy for Promoting Independent Travel for Adult Social Care Service Users

Background

The current policy for the provision of local councils' Adult Social Care services is aimed at promoting the maximum possible independence for the person who uses social care services. In extending this principle to councils' provision of transport services, this proposed policy sets the criteria that will be used to assess when the service user's transport need can be met best through independent travel arrangements or whether council-provided transport services continue to be necessary.

Principles

In general, this Policy is based on the assumption that people who use social care services will travel independently to take advantage of care provision, except where assessment shows that this is not possible, and is based on the following principles:

- The provision/funding for transport should **only** be considered if the client requires a comprehensive support package to meet eligible needs in accordance with the Council's Eligibility Criteria and Fair Access to Care Services (FACS)¹.
- Use of transport services should be based on the need to promote independence and to support service users to remain independently in their home for as long as possible.
- Individuals who are assessed and successfully supported will only travel independently if the Council considers it is completely safe for them to do so.
- Transport is provided to enable clients to access a range of community activities/respite and where parents/carers are unable to provide their own transport.
- The assessment of need for transport provision by the Council will be a separate element in the community care assessment; i.e. provision relates to a user's needs, not to the nature of the service they are receiving.
- The assessment will consider what would happen if the Council did not provide transport, for example, are there other ways in which the person can reasonably be expected to attend day opportunities making their own arrangements to get there.

Process

There are 4 stages in the process for assessment of eligibility for the provision of assistance with transport and the identification of appropriate transport as follows:

¹ Fair Access to Care Services (FACS) is the system used by all social services departments to work out whether someone qualifies for social care support. In Barnet, if someone's needs are shown to be 'critical' or 'substantial' under FACS criteria, they will qualify for support from the Council.

- Access to existing transport;
- Assessment of mobility;
- Assessment of ability to travel independently;
- Identification of appropriate transport provision for those eligible.

Stage 1: Access to existing transport

Clients will **not** normally be eligible for transport if:

- They have a mobility vehicle which they drive themselves. In this instance there will be consideration of whether it is reasonable to expect that the service user will use that vehicle in order to travel to the location of the care service/activity.
- They have a mobility vehicle of which they are not normally the driver themselves. Similarly, there will be consideration of whether it is reasonable to expect that the service user will use that vehicle in order to travel to the location of the care service/activity.

Clients will also **not** normally be eligible for transport if:

- They have a Freedom Pass (and a reasonable public transport route is available), and have been assessed at Stage 3 as capable of independent travel
- They receive the Mobility component of Disability Living Allowance, and:
 - this can adequately meet the cost of travel to meet their assessed social care needs;
 - they have been assessed at Stage 3 as capable of independent travel.²

Stage 2: Assessment of mobility

An assessment will be made of the client's mobility. This will involve assessing issues such as:

- Ability to walk outside (including slippery/icy weather conditions);
- Requirement for wheelchair/ other walking aid;
- Ability to get in and out of property;
- Ability to get in and out of vehicle;
- Risk of falling without support;
- Ability to bear weight to transfer;
- Whether mobile but at a risk when mobilizing due to uncontrollable movements;
- Ability to use stairs, manage gradients, steepness of stairs in home, safety, energy levels.

Clients will be categorized for this purpose as follows:

² Subject to further consideration by the Council of the local authority circular (DH) (24 October 2012) 3, with regard to the treatment of the mobility component of the DLA in relation to charging for social care.

- No mobility problems;
- Limited mobility problems;
- High/ complex mobility problems.

Some clients may need a weather plan put in place to ensure their safety during harsh or icy weather conditions.

Stage 3: Assessment of ability to travel independently

This assessment considers both physical and social reasons that enable or prevent the client from travelling independently. This will include:

- Extent of the mobility problems identified in Stage 2;
- Availability of family/carers;
- Communication difficulties (for example ability to order taxi or use public transport);
- Psychological factors e.g. mental health, loss of confidence, agoraphobia;
- Experience or risk of harassment;
- Any other factors affecting personal safety.

The assessor will determine whether the client:

- Is capable of travelling independently;
- Requires some training, support or assistance that will enable them to be capable of travelling independently in the near future;
- Not capable of travelling independently

Stages 1 to 3 will determine the eligibility of the client for some form of transport or transport assistance. Assuming the client is eligible under Stage 1 (access to existing transport) then the eligibility will be determined as follows:

		Mobility problems		
		None	Low	High/complex
Capable of Independent travel	Yes	Not eligible Use public transport Walk if more than 1km Use concessionary pass	Not eligible Use public transport Walk if more than 1km Use concessionary pass	Eligible May require door to door service
	Potentially	Eligible Directly-provided transport if no other suitable option	Eligible Directly-provided transport if no other suitable option as last resort	Eligible May require door to door service
	No	Eligible Designated pick-up points near home	Eligible Designated pick-up points near home	Eligible Requires door to door service

Stage 4: Identification of appropriate transport

Once eligibility has been assessed following the table above, it will be the duty of Adult Social Care services to make appropriate arrangements for transport. Directly provided transport services - whether internal or external - will be provided only once other alternatives have been considered and ruled out and not as a matter of course.

The range of provision includes:

- Assistance with using public transport, such as escorts
- Independent travel - provision of independent travel training where it is likely that this would resolve the client's need
- Existing taxi journey - shared with other clients
- Taxi service - solely for the use of the client
- Transport in council vehicles, for example minibuses

The assessment and provision of transport should be reviewed on a pre-determined basis, for example at the annual review.

Where clients move from Children's to Adult Social Care services, then their needs will be reassessed by Adult Social Care services in relation to the new services required.

APPENDIX 6 - PROPOSED ELIGIBILITY CRITERIA FOR THE PROVISION OF RESERVED PARKING BAYS FOR DISABLED PEOPLE

1. The applicant must be the holder of a valid Disabled Person's Blue Badge issued by the London Borough of Barnet; and
2. The applicant must be in receipt of the higher rate mobility component of Disability Living Allowance (age 65 or under), or the higher rate of Attendance Allowance (over 65 years of age); and
3. The applicant should normally be the driver of the vehicle for which the parking space is to be provided; or
4. If the applicant is not the driver but the passenger of the vehicle, the nominated driver must live at the same address as the applicant, and a bay may be provided if:
 - a. the applicant requires substantial physical assistance from the driver of the vehicle, when entering or leaving the vehicle and the driver is generally the only person available to assist the passenger; or
 - b. the applicant is sufficiently mentally or physically incapacitated to necessitate the constant supervision by the driver of the vehicle. The driver of the vehicle should be the only person available to effect this supervision and should live at the same address; or
5. A medical professional must confirm that the applicant's ability to walk is restricted to 50 metres or less, including rest stops; and
6. Only where in the opinion of Council Officers there is proven difficulty in parking on-street and no suitable alternative off-street parking facilities are available, will a 'designated' disabled bay be provided; or
7. Where off-street parking facilities are available, a designated disabled bay may be provided if the applicant can demonstrate, and the Council are satisfied that the facilities are unsuitable for the use of the applicant given the nature of their disability.