# Position Statement On Mobility Parking Permits

October 2018

It is Blind Citizens Australia’s position that blindness and vision impairment should be a qualification in the eligibility criteria for mobility parking permits throughout Australia. BCA would like to see a harmonised approach to the eligibility and conditions of use of mobility parking permits through the Australian Mobility Parking Scheme.

## Background:

The Australian Mobility Parking Scheme, introduced in 2016, includes an Australian Disability Parking Permit, which has enhanced security and identification features, and is recognised nationally. Despite the introduction of this National scheme, the eligibility, cost, and terms of use of mobility parking permits still vary between Australian states and territories. See Appendix 1 for details.

Blind Citizens Australia has long-advocated for the increased awareness of issues around pedestrian safety for people who are blind or vision impaired. Ease of access to close and accessible street and off-street parking options in order to locate facilities and buildings is of great importance for people who are blind or vision impaired. There are many safety concerns in carparks that could be alleviated or reduced with the option of a mobility parking permit for people who are blind or vision impaired. Accessible parking spaces are located close to the building entrance and therefore diminish the requirement of walking through traffic or crossing streets.

## Safety Concerns:

Shopping centre and other large and busy carparks can pose a safety hazard for people who are blind or vision impaired. This is due to the crowded, noisy and unpredictable nature of the carpark and drivers.

Additional time is often required to provide adequate assistance to allow a passenger who is blind or vision impaired to arrive safely at their destination. Mobility parking spaces allow for this extra unpaid street parking time, as well as allowances for passenger loading zones.

Barriers that can impact a person who is blind or vision impaired when travelling include:

* Navigating through busy carparks, shopping centres and large venues where there is no pedestrian access and a lack of clear signage.
* Negotiating new and unfamiliar environments without sighted assistance. Wayfinding – being able to get from A to B in a safe and independent manner using existing environmental cues - can be compromised by factors such as traffic, noise and unpredictable moving objects, such as cars and shopping trolleys.
* The availability of manoeuvring space when using a dog guide (the general term for Guide Dogs and Seeing Eye Dogs) and ensuring the safety of the animal when exiting and entering a vehicle.
* Walking while using mobility aids and carrying out other necessary activities such as carrying goods or travelling with children.
* Weather conditions which can present issues for people who are vision impaired, such as glare sensitivity or being able to get around in low levels of light. Wind and rain also affects the navigation of people who are blind or vision impaired due to extra noise as well as slip hazards.
* Introduction of hybrid and electric vehicles which are difficult to detect due to their silent nature at slow speeds.
* Navigating from or to a parked car when being dropped off or picked up, particularly in restricted areas.
* Due to modern design and security considerations, car parking spaces, both on and off-street are often a fair distance away from venues.

## Appendix 1

Mobility Parking Permit Eligibility by State or Territory

This information is correct as of October 2018

NSW Mobility Parking Scheme Eligibility

To be eligible for a Mobility Parking Scheme permit, you must have a **disability**. This is defined by legislation as someone:

* Who is unable to walk due to the permanent or temporary loss of use of one or both legs or other permanent medical or physical condition, or
* Who is unable to walk because of other permanent medical or physical condition, or
* Whose physical condition is detrimentally affected as a result of walking 100 metres, or
* Who requires the use of crutches, a walking frame, callipers, scooter, wheelchair or other similar mobility aid.

Mobility Parking Scheme permits are also available to people who are permanently blind. Guidelines for permanent blindness from the *Commonwealth Social Security Act 1991* are:

1. Visual acuity on the Snellen Scale after correction by suitable lenses must be less than 6/60 in both eyes, or
2. Constriction to within 10 degrees of fixation in the better eye irrespective of corrected visual acuity, or
3. A combination of visual defects in the same degree of visual impairment as that occurring in points 1 or 2.

Minimum age

Mobility Parking Scheme permits can be issued to people three years of age and above.

Clinically Recognisable Disabilities

A Clinically Recognisable Disability (CRD) is a permanent disability certified by a doctor for the purposes of issuing a Mobility Parking Scheme permit.

If you meet the Clinically Recognisable Disability criteria, you do not need a doctor to certify your disability when you renew your card. You only need to provide a doctor’s certification when you first apply for a Mobility Parking Scheme permit, or if you already hold a permit when you become eligible for Clinically Recognisable Disability status.

Your renewal notice will state whether or not you need to provide a medical report to renew your permit.

The following conditions are considered Clinically Recognisable Disabilities:

* Paraplegia
* Quadriplegia
* Leg amputations
* Motor Neurone disease
* Cerebral Palsy
* Chromosomal or syndromic conditions
* Neurodegenerative disorders
* Neuromuscular conditions
* Blindness

This list has been developed in consultation with the NSW Disability Council and with reference to criteria used by Centrelink for carer allowance applications.

Roads and Maritime does not record the details of your disability, only whether or not you meet the criteria.

<http://www.rms.nsw.gov.au/roads/using-roads/mobility-parking/index.html>

## **Victorian Disability Parking Permit Scheme**

### Permit categories

A category one permit holder (driver/passenger) is entitled to:

* Park a vehicle in a reserved disability parking bay for the time displayed on the parking sign, or
* Park a vehicle in any ordinary parking bay for twice as long as the time displayed on the parking sign.

To be eligible for a category one permit:

* a Medical Practitioner must confirm that an individual has a significant ambulatory disability\* and they cannot access a vehicle in an ordinary parking bay, or they are required to use a complex walking aid\*\* that prevents access to a vehicle in an ordinary parking bay, or
* a Medical Practitioner must confirm that an individual has either an acute or chronic illness in which minimal walking may endanger their health\*, or
* a Specialist Medical Practitioner or Clinical Psychologist must confirm that an individual has a significant intellectual disability which makes them an extreme danger to themselves and others in a public place without continuous attendance by a carer.

\*  A significant permanent ambulatory disability is a disability that is not likely to improve in a person’s lifespan

A significant long-term ambulatory disability is a disability that is not likely to improve within six months

\*\*A complex walking aid is defined as an aid which has more than one contact point with the ground.

#### Category Two (green permit)

A category two permit holder (driver/passenger) is entitled to:

* Park a vehicle in any ordinary parking bay for twice as long as the time displayed on the parking sign.

To be eligible for a category two permit:

* A Medical Practitioner must confirm that an individual has a significant ambulatory disability or severe illness which does not affect their ability to walk, however they require rest breaks when continuous walking is undertaken.

#### Temporary disability parking permits

Category one or category two temporary permits can be issued to an individual whose ability to walk is significantly restricted on a temporary basis and is not likely to improve within six months.

Organisation disability parking permits

Organisations transporting individuals who meet the eligibility criteria are required to complete a separate application form. Eligible organisations will receive a permit for 12 months.

Types of disability parking permits

Within the categories one or two, councils may issue permits as follows:

* Code A – for a driver or passenger who has a permanent ambulatory disability or an acute or chronic illness or significant intellectual disability
* Code B – for a passenger has a permanent ambulatory disability or an acute or chronic illness or significant intellectual disability
* Code C – for organisations transporting individuals with a disability (only applicable for category one)
* Code D – for a temporary permit

<https://www.vicroads.vic.gov.au/safety-and-road-rules/road-rules/disability-parking>

Queensland

In Queensland the disability parking scheme is a mobility scheme based on a person's functional impairment to their ability to walk.

### Individuals

You may be able to [apply for an Australian permit](https://www.qld.gov.au/disability/out-and-about/parking-permits#apply) if you are a Queensland resident and 1 of the following applies to you:

* unable to walk and always require the use of a wheelchair
* ability to walk is severely restricted by a permanent medical condition **or** ability to walk is severely restricted by a temporary medical condition or disability that you will have for 6 months or more as certified by your doctor or occupational therapist.

Applicants with intellectual, psychiatric, cognitive or sensory impairment alone do not meet the eligibility criteria unless the applicant also has a mobility impairment that impacts on their ability to walk.

No changes will be made to the Disability parking permit scheme when the NDIS is introduced in Queensland. Current arrangements for this scheme will be maintained.

<https://www.qld.gov.au/disability/out-and-about/parking-permits>

South Australia

You can apply as an individual for a disability parking permit in South Australia if you meet all of these conditions:

* you have permanent physical impairment or a temporary impairment that is likely to endure for more than six months
* the impairment severely restricts speed of movement
* your ability to use public transport is significantly impeded by the impairment.

Organisations can apply for a disability parking permit if they provide transport services to at least four people with a disability.

<https://www.sa.gov.au/topics/driving-and-transport/other-forms-of-transport/getting-around-with-a-disability/disability-parking-permit>

Western Australia

To be eligible for an ACROD Parking Permit you must meet one of the following criteria:

* You are unable to walk and always require the use of a wheelchair, or
* Your ability to walk is severely restricted by a permanent medical condition or disability, or
* Your ability to walk is severely restricted by a temporary medical condition or disability.

<http://www.concessions.wa.gov.au/Concessions/Pages/ACROD-Parking-Permits---Australian-Disability-Parking-Scheme.aspx>

Tasmania

The Transport Access Scheme (TAS) assists people with a life-long, permanent and severe disability which affects mobility. (It cannot be temporary or corrected by recognised surgery or treatment.) Eligibility for TAS does not take into account the availability of public transport or proximity to public transport.

<https://www.transport.tas.gov.au/passenger/concessions>

ACT

An Australian disability parking permit (also known as a mobility parking permit) may be issued to a person with a disability:

* who cannot walk because of permanent or temporary loss of the use of one or both legs or another permanent medical or physical condition; or,
* whose physical condition is detrimentally affected by walking 100m; or,
* who needs to use a walking frame, crutches, callipers, a scooter, a wheelchair or a similar mobility aid; or,
* who is blind.

Organisations are eligible for Australian disability parking permits if they provide transport for people who meet the eligibility criteria.

Applications for an Australian disability parking permit must be assessed by a legally qualified medical practitioner or specialist eye doctor.

A person who holds a Centrelink disability pension card, endorsed as 'Blind' is not required to be examined by a doctor, however the person's Centrelink disabilty pension card must be provided on application.

To apply for an Australian disability parking permit within the ACT, the applicant/organisation must reside or be based in the ACT.

There is no fee for an Australian Disability Parking Permit in the ACT.

<https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/1677/~/parking-permits#!tabs-2>