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Physical Disability Australia Submission:

Disability Parking Permit Scheme Review



Physical Disability
AUSTRALIA

Acknowledgements

Physical Disability Australia pays our respects to the Traditional Owners of the lands on which this submission was written and throughout Australia. We recognise their continuing connections to land, waters and skies and pay our respects to Elders past, present and emerging.

Physical Disability Australia also acknowledges people with disability, past and present, those who are living full and complete lives and those who have needs that are not yet being met. We ask you to reflect on this and to work with us to bring about the changes that will give ALL people with disability an opportunity to live an ordinary life.

About Physical Disability Australia

Physical Disability Australia (“PDA”) is a national peak Disability Peoples Organisation run by people with physical disability for people with physical and intersectional disability. PDA exists for its members, who fuel our mission to “enable every Australian living with a physical disability to realise their full potential”.

Through our work, we advocate to government, create equal opportunities, promote diversity and inclusion and ensure that our values within the organisation, and our representation of Australians living with physical disability, are reflected, upheld and defended.

With physical disability affecting 75.3% of Australia’s disability community, Physical Disability Australia welcomes the opportunity to provide a response to the *Disability Parking Permit Scheme Review*.

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1. General Questions

The purpose of the Scheme is to provide access to community facilities and services for people with a disability.

1.1. How could the Scheme provide greater access to community facilities and services for all permit holders?

Accessible parking is essential infrastructure that enables people living with a disability to lead normal ordinary lives by access healthcare, employment, education, community participation, recreation, culture and social connection. Without reliable access to appropriate parking close to destinations, many people living with a disability are effectively excluded from public life.

Physical Disability Australia recommendations

Increase the availability and consistency of accessible parking

A major barrier of community access for people living with a disability is the insufficient number of accessible parking spaces, especially in high demand locations such as hospitals or medical precincts, shopping centres, transport hubs, entertainment venues and beaches. This issue is particularly acute in regional and outer suburban areas where public transport alternatives may be limited or inaccessible.

The Scheme should work to:

- Increase the minimum number of accessible parking pays in both public and private developments;
- Require accessible bays to be distributed near all major entrances, not concentrated in one location;
- Improve compliance with accessibility design standards including wider bays, safe gradients, kerb ramp access, shelter, lighting and continuous accessible pathways.

Improve accessibility beyond mobility-only assumptions

Whilst the Scheme has historically focused on visible physical mobility impairments, many disabilities that significantly affect access are invisible, episodic, fluctuating or related to energy limitation and sensory or cognitive functioning.

It is PDA's view that the Scheme should adopt a more inclusive understanding of disability and functional impact, recognising the barriers experienced by people with neurological conditions, autism and intellectual disability, psychosocial disability, chronic illness and fatigue conditions.

Improve affordability and consistency across Queensland

Permit holders frequently encounter inconsistent parking rules, fees and enforcement practices across local government areas and private operators. This can create confusion and anxiety, especially for people travelling for medical care or essential services. Cost barriers disproportionately impact people living with a disability, who are more likely to experience poverty, higher healthcare costs and under-employment, so it is vital this is considered.

PDA recommends:

- Standardize concessions and enforcement practices across jurisdictions;
- Expand free or discounted accessible parking in key locations such as hospitals and medical precincts;
- Ensure private parking operators cannot impose unreasonable barriers on permit holders;
- Improve reciprocity and recognition across states and territories.

Improve digital and physical access to parking information

Many permit holders struggle to identify accessible parking locations prior to travelling. Information accessibility is especially vital to individuals with cognitive disability, low vision, acquired brain injury, neurodivergence, and people from culturally and linguistically diverse communities.

PDA recommends:

- Real-time accessible parking information and mapping;
- Integration with navigation and transport applications;
- Improved signage and wayfinding;
- Accessible information in multiple formats, including Easy Read, screen-reader compatible, translated and plain-language materials.

Strengthen enforcement while reducing punitive impacts on people living with disability

The misuse of accessible parking spaces remains to be a significant issue faced by many people living with disability. It undermines confidence in the Scheme and an individuals ability to safely and comfortably access the community.

PDA recommends that increased education for the wider community and targeted enforcement is necessary. It must also be recognised that some disabilities are invisible and can be hidden or not present immediately. Unfortunately, experiences of harassment, discrimination and public accusations for permit holders who do not present as 'physically disabled' are common.

To combat this, PDA recommends public education campaigns that:

- Addresses the misuse of accessible parking;
- Promotes understanding of invisible, episodic and dynamic disabilities;
- Reduces stigma and hostility toward permit holders.

Ensure co-design with people with disability

Any and all reforms to the Scheme should be co-designed with a wide cross-section of people with disabilities and their representative organisations, including people with First Nations disability experience, are from culturally and linguistically diverse backgrounds, have regional and remote experiences and intersecting identities.

Accessible parking policy should be informed by lived experience, expertise and should be grounded in the principle that mobility access is fundamental to social and economic participation.

1.2. What challenges do people face when applying for a disability parking permit? How could the Department improve this experience?

Many people living with disability experience the current application process as inconsistent, medically gatekept, burdensome and inaccessible. These barriers can delay or prevent access to a permit even where there is clear functional need. PDA believes that the application process should be trauma-informed, accessible and proportionate to the purpose of the Scheme.

Challenges experienced can include

An overly narrow and inconsistent eligibility assessment

It is frequently observed by applicants that the assessment process focuses too heavily on visible physical mobility impairment and walking distance, without adequately addressing or recognising the existence of fluctuating conditions, chronic pain and fatigue, neurological conditions, cognitive and sensory disability, psychosocial disability, energy-limiting impairments and cumulative impacts of multiple disabilities. This can result in inconsistent outcomes and the exclusion of people with legitimate access needs.

Medical gatekeeping and financially burdensome

Many people living with disability often face significant challenges obtaining medical evidence for their applications. This includes long wait times for appointments, high out of pocket costs, clinicians unfamiliar with eligibility criteria, reluctance from clinicians to support applications and repeated reassessments for permanent disabilities. These barriers disproportionately impact people on low incomes, people in regional or remote areas and people with complex or less visible disabilities.

To combat this, **PDA recommends:**

- Expanding the training and range of professionals able to certify applications, including occupational therapists, physiotherapists, nurse practitioners and other relevant allied health professionals;
- Reduce or eliminate fees associated with applications;
- Introduce longer duration or permanent permits where conditions are life-long or unlikely to improve;
- Allow supporting evidence already provided through other government disability systems to be accepted where appropriate.

Administrative and accessibility barriers

The application process can be difficult to navigate, particularly for people with cognitive disability, low literacy, fatigue, vision impairment, language barriers or limited digital access. Application forms should be simplified and designed using universal design principles.

PDA recommends:

- Providing fully accessible online and paper application processes, so the applicant can select whatever format is most appropriate for their circumstances;
- Offering Easy Read and plain-language materials;
- Ensuring compatibility with screen readers and assistive technology;
- Providing multilingual resources and interpreter access;
- Allowing trusted support persons or advocates to assist applicants;
- Offering telephone and in-person support options.

Delays and uncertainty

Long processing times can leave people living with a disability without essential access supports for extended periods, particularly after diagnosis, injury or surgery.

PDA recommends:

- Introducing transparent processing timeframes;
- Providing application tracking and updates;
- Offering interim or temporary permits where urgent need exists;
- Streamlining renewals for existing permit holders.

Lack of transparent review and appeal pathways

Applicants who are refused permits may not understand the reasons for the decision, or how to appeal the decision.

Therefore, PDA believes that the Department should:

- Provide clear written reasons for refusals with options in Easy Read and plain-language;
- Establish accessible internal review mechanisms;
- Ensure applicants can submit additional functional evidence;
- Support independent advocacy and assistance throughout the appeals processes.

PDA recommends the Department should adopt a human rights-based approach, operating consistently with Australia's international obligations under the Convention on the Rights of Persons with Disabilities (CRPD), including the right to accessibility, mobility, community participation and equality before the law. The application process should not require people living with a disability to repeatedly prove or justify their need for equal participation in community life. Instead, the Scheme should reasonably and where appropriate presume inclusion and focus on removing barriers to access.

1.3. All correspondence with permit holders (such as an invitation to apply for a permit) is sent through Australia Post. Is this accessible to all permit holders? Should the Department consider greater use of electronic communication such as email?

Reliance solely on postal correspondence is not accessible for all permit holders and does not reflect contemporary communication needs. Many people living with disability face barriers in retrieving, opening and managing physical mail due to limited mobility, dexterity, or fatigue. Delays in postal delivery can also create significant disadvantages, especially when time-sensitive actions are required.

PDA recommendations

The Department should adopt a multi-channel communication approach. Electronic communication such as email, SMS notifications and accessible online portal should be offered as standard, with clear opt-in and opt-out preferences. This would allow permit holders to choose the format that best suits their needs and personal circumstances. Digital communication can improve timelines, reduce administrative burden and support better engagement. Despite this, it is critical that it is implemented inclusively. Systems must meet accessibility standards and alternatives must remain available for individuals who are not digitally connected.

Communication should not be viewed with the 'one size fits all' lens. A flexible, user-centred model, where individuals can nominate their preferred method, will deliver the greatest accessibility and equity.

2. Eligibility Criteria

Currently, the Scheme eligibility criteria is limited to individuals with mobility or vision impairments. The Department recognises that safe and equitable access to the community is not solely determined by a person's physical ability to walk, and that neurological, cognitive, behavioural or hearing condition can create safety risks environments such as busy car parks.

2.1. Should the Department broaden the eligibility requirements to include other conditions? What would the impacts to the Scheme be?

Broadening eligibility should be considered through a functional lens that recognises the diverse ways disability can affect a person's ability to safely and equitably access the community. While the Scheme has traditionally focused on physical mobility impairments, it is important to acknowledge that people with cognitive, neurological, behavioral, sensory and hearing disabilities may also experience significant barriers in navigating public spaces, including parking environments.

PDA believes that the Scheme should move away from a narrow visible mobility-only model and adopt a functional access approach that reflects the real-world barriers people living with a disability experience when travelling to and from vehicles and navigating public environments.

Disability is not limited to an inability to walk, many people experience significant access barriers due to conditions impacting cognition, perception, sensory processing, executive functioning, orientation, communication, behaviour regulation, balance, fatigue, distress tolerance or safety awareness. These barriers can substantially impair an individual's ability to safely access the community even when they may appear physically mobile.

Broadening eligibility criteria would improve equity, consistency with contemporary disability frameworks, and alignment with Australia's human rights obligations under the *Convention on the Rights of Persons with Disabilities* (CRPD).

A functional-needs approach is more appropriate than diagnosis-based exclusion

Eligibility should not be automatically determined by diagnosis alone, nor should particular diagnostic categories be categorically excluded. Many neurological, cognitive, behavioral, hearing, psychosocial, and developmental disabilities can create barriers equivalent to, or at times greater than, physical mobility impairments in certain environments.

PDA recommends that the assessment should consider:

- The person's functional limitations;
- Safety risks;
- Capacity to navigate public environments independently;
- Impacts of sensory or cognitive overload;
- Risks associated with distance from a vehicle; and
- Whether close vehicle access is necessary for equitable participation in community life.

Broadening criteria would improve participation and reduce exclusion

Restrictive eligibility criteria currently exclude many people whose disabilities substantially impair their ability to access safety services and community facilities. If the Department were to expand the eligibility criteria, it would improve access to healthcare and medical appointments, education and employment, community participation, recreation and cultural activities, social and family life for people living with a disability.

Importantly, broadening the Scheme would support carers and families who are often unable to safely transport people with higher support needs over long distances in uncontrolled environments. It is vital to note that proximity to a vehicle is not merely a convenience, but a necessary disability support that enables the participant in public life.

Concerns about Scheme sustainability should be addressed through evidence-based planning, not exclusion

It should be acknowledged that concerns about broadening the eligibility criteria may increase demand on the Scheme, and create pressure on accessible parking availability. However, these pressures should not be addressed by excluding people living with a disability who have legitimate access needs. The existence of unmet need is not evidence that people should remain excluded from access supports.

Instead, PDA recommends the Department should:

- Increase the number of accessible parking bays;
- Improve planning standards;

- Strengthen enforcement against misuse and discrimination for permit holders with invisible or dynamic disabilities;
- Improve data collection and forecasting;
- Adopt tiered or flexible permit models if required.

Risks of stigma and hierarchy between disabilities

Public discourse around disability parking permits has previously privileged visible physical disability and contributed to harmful assumptions that permit users must “look disabled”. Education is a vital step to addressing the discrimination and ableism many permit users face. Particularly, individuals with neurological, psychosocial, cognitive and episodic disabilities.

Public education should accompany any broadening of eligibility criteria to emphasise that:

- Many disabilities are invisible;
- Disability impacts are diverse;
- Permit eligibility is based on functional need, not public or outward perception.

Safeguards and clear assessment guidance are important

When broadening the eligibility criteria, it should be accompanied by:

- Clear functional assessment criteria;
- Guidance for health professionals;
- Consistent statewide decision-making processes;
- Transparent review mechanisms.

Assessment should focus on demonstrated access barriers and safety risks rather than subjective judgements about diagnostic labels. It is imperative that assessors have disability competency training, including understanding invisible disability, neurodivergence, psychosocial disability and fluctuating conditions.

The Scheme should reflect modern understandings of disability

The current Scheme framework reflects an outdated and overly narrow understanding of disability, centred primarily on physical mobility impairment.

PDA believes that whilst physical mobility is a very important and necessary reason to require access to the scheme, it is one of many. We believe that this is an opportunity to modernise the Scheme to better reflect:

- Contemporary disability rights principles;

- Person-centred assessment;
- Universal design;
- Inclusion and participation;
- The diversity of lived expertise from people living with a disability.

Broadening eligibility criteria would help to ensure that disability parking permits function as an access and participation support, rather than a narrowly medicalised mobility concession.

2.2. For individuals with neurological, cognitive, behavioural or hearing conditions, what specific safety risks or mobility challenges should be considered when determining eligibility for a disability parking permit?

Eligibility for disability parking permits should recognise disability-related barriers are not limited to visible or physical mobility limitations. For individuals with neurological, cognitive, behavioural or hearing conditions, eligibility assessments should consider the extent to which a person experiences substantial difficulty accessing the community safely and equitably, without close proximity parking. The Scheme should avoid narrow interpretations of 'mobility impairment' that rely solely on walking distance. Accessibility and safety must be understood more broadly to include the functional and environmental barriers experienced by people with diverse disabilities.

Relevant considerations could include:

- Increased risk of disorientation, confusion, wandering, or becoming lost in car parks or unfamiliar environments;
- Difficulties processing traffic movement, auditory warnings, or environmental hazards;
- Reduced capacity to safely navigate busy roads, crossings or complex pedestrian environments;
- Impacted special awareness, balance, coordination, reaction time, or fatigue associated with neurological conditions;
- Significant sensory processing challenges, including vulnerability to distress, overload, or behavioural escalation in crowded or high-stimulation environments;
- Communication barriers that may affect an individual's ability to seek assistance or respond to safety risks;
- The need for support workers, mobility aids, medical equipment or assistance animals that require additional space and proximity;
- Episodic or fluctuating conditions where mobility and safety impacts vary but remain substantial.

It is vital that assessments are individualized and evidence based, as opposed to diagnosis based. Not all individuals with the same condition experience the same barriers, and eligibility criteria should remain flexible enough to accommodate this diversity.

3. Permit Duration

Currently, customers may receive either a 5-year permit (known as an A5) or a 6 – 12-month permit (known as an A1), depending on the expected duration of their disability.

3.1. The Department is considering introducing a permanent permit for people with permanent disabilities. What would be the benefits or drawbacks of this change?

Physical Disability Australia strongly supports the introduction of a permanent permit for individuals with permanent disability. Many people that live with lifelong or permanent disability are currently required to repeatedly demonstrate their eligibility despite there being no prospect of functional improvement. The requirement of ongoing reassessment in these circumstances creates unnecessary administrative burden, financial costs, stress and barriers to participation.

The introduction of a permanent permit would likely:

- Reduce the administrative burden for permit holders, medical practitioners and government;
- Improve dignity and reduce the harmful experience of repeatedly their ‘proving’ disability;
- Better align the Scheme with a human rights approach that recognises disability as an enduring interaction with barriers, rather than something requiring continual justification;
- Improve continuity of access to community participation, healthcare, employment, education and social inclusion;
- Allow departmental resources to be redirected toward processing new applications and compliance activities.

Appropriate safeguards should still be maintained, such as periodic administrative confirmation of contact details or permit status, without requiring full medical reassessment.

Potential drawbacks may include concerns regarding outdated information or misuse following a person’s death or changed circumstances. However, these risks can be addressed through data-matching processes, cancellation mechanisms and targeted compliance activities, rather than mandatory reassessment of people with a permanent disability.

A permanent disability permit category should also recognise that “permanent” disability does not necessarily mean static functioning. Many individuals experience fluctuating capacity while still having lifelong disability-related mobility barriers.

3.2. Should customers with an A5 permit be required to undergo a medical assessment to renew their permit? Why or why not?

In circumstances where an individual has a clearly permanent or lifelong disability, requiring repeated medical assessments creates unnecessary burden without meaningful public benefit. As previously stated, it also imposes additional financial costs, delays and stress for those who already face barriers accessing healthcare.

Mandatory reassessment may disproportionately impact people living in regional and remote communities, people with limited access to medical specialists, people on low incomes, people with fluctuating conditions who may experience significant functional impairment despite variable presentation.

A human rights-based approach should presume continuity of eligibility where permanence has already been established by an appropriate qualified practitioner.

However, there may be limited circumstances where reassessment may be appropriate, including:

- Where the original permit was granted based on a temporary or uncertain prognosis;
- Where there is credible evidence of misuse or changed circumstances;
- Where the permit category itself is time limited.

Any review process should be proportionate, accessible, trauma-informed and administratively simple.

3.3. Is the current minimum permit of 6 months appropriate? Should a shorter permit period be considered to support people with shorter-term injuries that impact their mobility What would be an appropriate minimum timeframe? Why?

Physical Disability Australia supports a shorter temporary permit option. The current six-month minimum may exclude people who experience significant short-term mobility restrictions that substantially limit safe access to the community, including:

- Fractures and orthopedic injuries;
- Post-surgical recovery;
- Temporary neurological impairments;
- Cancer treatment and associate fatigue;
- High-risk pregnancy complications;
- Acute medical conditions requiring mobility aids.

Temporary disability can still create serious accessibility barriers and participation restrictions. PDA recommends consideration of a minimum permit period of 6 to 12 weeks, with certification from an appropriately qualified health practitioner. This timeframe would provide flexibility while reducing unnecessary administrative burden associated with very short-duration permits. The Scheme should ensure that temporary permits remain accessible and affordable, particularly for individuals experiencing sudden injury or illness.

4. Organisation Permit

4.1. Is there still a need for organisations to hold disability parking permits? What benefits do they provide to individual permit holders?

PDA believes that there remains a strong need for organisation-held permits. While individuals may now hold multiple permits, this does not fully address the practical realities of disability support and transport services. Organisation permits continue to provide important benefits, such as:

- Ensuring continuity of access when individuals forget, misplace or cannot independently manage permits;
- Supporting shared transport arrangements utilised by multiple people with disability;
- Reducing administrative burden on individuals and families;
- Enabling flexible and responsive transport support, particularly in community access, respite, day programs, health services, and supported accommodation settings;
- Supporting people with cognitive, communication, psychosocial or high support needs who may not be able to independently manage permit processes.

Removing organisation permits risks creating additional barriers for people who rely on disability service providers for safe and reliable transport. The central purpose of the Scheme should remain ensuring equitable access and participation for people living with disability, rather than transferring administrative burden onto individuals.

4.2. What type of organisation should be eligible to hold a permit? Should there be restrictions on organisations that can hold a permit?

Organisation permits should remain available to organisations that regularly transport people with disability as part of their service delivery. Eligible organisations may include:

- Registered disability service providers;
- Community transport providers;
- Residential and supported accommodation providers;
- Aged care organisations supporting younger people with disability;
- Educational institutions transporting students with disability;
- Non-profit and community organisations providing disability-related transport.

Appropriate safeguards and restrictions are reasonable to reduce misuse. These may include:

- Requiring organisations to demonstrate a genuine transport function involving people with disability;
- Limiting permits to organisational vehicles or authorised transport arrangements;
- Maintaining records of permit use;
- Introducing penalties for misuse.

Any restrictions should remain proportionate and should not create unnecessary barriers for smaller community-based organisations or regional providers.

4.3. Is it practical for individuals to use one of their own permits when travelling with an organisation?

In limited circumstances, it is practical for individuals to use one of their own permits when travelling with an organisation, but not consistently or universally. For some individuals living with a disability, managing permits across multiple vehicles and support arrangements is not practical. This may be particularly challenging for:

- People with intellectual disability or cognitive impairment;
- People with psychosocial disability;
- Children;
- People with high support needs;
- People who use multiple transport providers;
- People experiencing fatigue, pain or fluctuating functioning.

There are also risks associated with permits being lost, forgotten, damaged, or unavailable during unplanned transport changes. Organisation permits provide flexibility and reduce the administrative burden placed on people living with disability and their families. They should therefore remain available alongside individual permits, rather than being replaced by them.

5. Permit Enforcement

5.1. To help to deter misuse and ensure accessible parking bays are available, the Department is exploring ways to modernise permit verification. How supportive would you be of introducing digital features, to help authorised officers quickly verify that a permit is currently active?

Physical Disability Australia is generally supportive of modernising permit verification systems in circumstances where this improves accessibility, reduces misuse, and protects the integrity of the Scheme. QR codes or similar digital verification features may assist authorised officers to confirm permit validity more effectively and reduce fraudulent use. This could improve availability of accessible parking spaces for legitimate permit holders. Key considerations include:

- Digital features should complement, not replace, physical permits;
- People must not be disadvantaged if they have limited digital literacy, limited access to technology, or live in areas with poor connectivity;
- Personal information and disability related data must be protected through strong privacy safeguards;
- Enforcement approaches should remain respectful, trauma-informed and non-discriminatory;
- Any technology introduced should be compatible with accessibility standards and universal design principles.

PDA also cautions against approaches that increase surveillance or create additional burdens for permit holders. The primary objective should be improving access and reducing misuse while preserving dignity, autonomy and privacy for people living with disability. Finally, improvements to enforcement should be accompanied by broader public education regarding the importance of accessible parking and the diverse range of disabilities that may require permit access, including non-visible disabilities.