



**Submission made by
Julia Farr Association**

Harmonisation of Disability Parking Permit Schemes in Australia

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1.0 PURPOSE

The Julia Farr Association (JFA) wishes to make a submission to the Department of Families, Housing, Community Services and Indigenous Affairs on the proposed 'Harmonisation of disability parking permit schemes in Australia'.

JFA strongly supports the Commonwealth Government's initiative to harmonise parking permit schemes to help alleviate current confusion between states and abuse of parking permits.

Throughout this submission JFA will refer to the 'disability parking permit scheme' as 'accessible parking permit scheme'. The term 'accessible parking' is a positive term which promotes independence, equality and focuses on what a person can do instead of highlighting what a person cannot do.

2.0 INTRODUCTION

JFA and its predecessor organisations have been involved with the disability community for 130 years and have established strong networks in the disability and wider community. JFA seeks to foster innovation, share useful information, and identify and promote policy and practice that may be helpful in improving the life chances for people living with disability.

JFA's submission provides feedback around the proposed eligibility criteria, concessions, permits designs and provides additional recommendations on the proposed harmonisation of accessible parking permit schemes in Australia.

3.0 ELIGIBILITY FOR A PERMANENT PARKING PERMIT

JFA is supportive of the proposal for consistent eligibility; however express the following concerns with **Criterion 2**. The Criterion reads as follows:

"Your ability to walk is permanently and severely restricted and you sometimes require the use of a mobility or medical aid. This does not include a walking stick, shopping trolley or pram".

JFA recommends that a person who uses a walking stick (who has been assessed by their GP) should not automatically be excluded from the eligibility criterion. From consultation with people living with disability and the wider community reasons include:

- A person living with disability who uses a walking stick often requires a wider park to exit from their car with dignity. It is important for a person to have adequate space to swing their door wide open and to use it as a mechanism for pulling themselves out of their seat. 'Regular' parks can be too small for this to occur;
- A person living with disability who uses a walking stick who does not have a support person or family member to assist them may rely on a parking permit for greater

independence. There is the potential for increased reliance on others for a person who uses a walking stick if they are not eligible for a parking permit and are not able to walk the increased distance from a 'regular' car park;

- A person living with disability who uses a walking stick may have limited stamina and may not be able to walk long distances.

JFA would also like to make comment on the eligibility for **Criterion 3**. The eligibility Criterion reads as follows:

“You do not use a mobility or medical aid but your ability to walk is permanently restricted by a significant medical condition or disability, which sometimes requires the physical assistance of another person and limits your access to the community”.

- JFA is concerned that there are some disabilities which do not fit into this criteria as well as the first two criteria, therefore will be excluded from the opportunity of obtaining a parking permit. For example, the criterion is not clear if a person living with an intellectual or behavioural disability would be eligible for a parking permit. For example a person living with autism may experience sensory impairments such as auditory, tactile and visual therefore making it difficult for a person to withstand everyday stimulation and affecting a person's behaviour¹.
- Under the proposed criterion a person is eligible if 'their ability to walk is permanently restricted'. JFA expresses concern that this does not include disabilities which require a wider park. This may include such disabilities as a person living with vision impairment where a person requires the wider park so that they can organise themselves and their guide dog.

4.0 ELIGIBILITY FOR A TEMPORARY PARKING PERMIT

JFA supports the proposed concept of consistent eligibility criteria for a temporary parking permit under the Australian accessible parking scheme. JFA recommends the following changes to the criteria:

- The suggested minimum period for a temporary permit of six months is in some cases too long. For example, the recommended post operative recovery time frame for a knee reconstruction is 12 weeks². By issuing permits for longer than is necessary, there is risk of a person abusing the system by having access to a parking permit for longer than is required. This also adds to the current issue where there are already not enough parking spaces for eligible people living with disability;

¹Overview of Autism, Isabella's Autism Pages, viewed 31 July 2009, <<http://www.banoncom.com/isa/whatis2.htm>>

²Wiki Doc n.d., 'Anterior cruciate ligament reconstruction', viewed 26 June 2009, <http://www.wikidoc.org/index.php/Anterior_cruciate_ligament_reconstruction>.

- Criterion 1 refers to a person who uses a walking stick not being eligible for a temporary parking permit. Again a person using a walking stick (if assessed by their GP) may require a wider park to exit their car and for mobility and access reasons;
- Criterion 2 refers only to a person who has restricted mobility and walking disabilities and does not cover other disabilities which may require a temporary parking permit.

5.0 CONCESSIONS

Within South Australia the harmonisation of accessible parking permit schemes has proposed that South Australians will now have less time to park for permit parking concessions than previously. JFA acknowledges that timeframes need to be consistent amongst states however people with current parking permits living in South Australia have expressed concern for the following reasons:

- Quality of Life - A shortened time frame to park has the potential to affect a person's quality of life. For example the time frame for a person who uses a wheelchair may be longer than that of a person without a disability when you consider the process of a person getting into their chair, buying a ticket and then having to get back into their car again so that they are able to place the ticket onto the dashboard. During a person's journey to their destination it is likely that they will also come across paths that are not accessible, adding to the person's length of journey. Added to this a person who also has diminished upper body strength and who uses a manual wheelchair may find that the proposed shortened time frame to park will decrease their opportunity to access their community;
- Safety – There has also been concern raised by parents and support workers of people who use an electric wheelchair that a shortened time frame could affect the safety of assisting a person from their vehicle. Parents and support workers have emphasised that with a shortened time frame to park, they do not want to compromise a person's safety by 'hurrying up' with the process of assisting a person from their vehicle. If you also added in a personal care break then there is concern that a person could easily exceed the shortened concession time frame.

6.0 PERMIT DESIGN

JFA supports a proposed new permit design to assist with increased durability, security features and to minimise confusion across the states and territories.

JFA supports Option 'A' design with the following recommended changes:

- JFA recommends that the parking permit is not fixed to the inside of the car windscreen as the parking permit belongs to the person not the car. The proposed recommendation of the permit being fixed to the windscreen would mean that the

person is not able to use the permit in another car or as mentioned in the proposal to travel overseas;

- JFA proposes that the permit be located on the car's dashboard for display with the option of a Velcro strip so that the permit can remain fixed in the car and can also be removed and used in a second car if needed;
- JFA recommends that the proposed wording of 'Australian Disability Parking Scheme' be changed to 'Australian Accessible Parking Scheme'. The term 'accessible parking' is a positive term which focuses on what a person can do instead of highlighting what a person cannot do.

JFA does not support Option 'B' for the following reasons:

- Some people living with disability may not be able to hang 'option B' onto their rear vision mirror. For example if a person has dexterity difficulties or a person has limited movement in their arms;
- A person living with disability may not be able to pick up their permit if it is knocked or falls when they are getting out of their car;
- A person may forget to hang their permit up if it is not reliably fixed.

7.0 ADDITIONAL COMMENTS

JFA would also like to make the following additional comments:

- JFA encourages the term 'accessible parking' instead of the phrase 'disability parking'. The term 'accessible parking' is a positive term which promotes independence, equality and focuses on what a person can do instead of highlighting what a person cannot do;
- JFA recommends that there be no cost for the accessible parking permits for the person living with disability. JFA strongly supports equality and believes that there should be no cost forwarded onto the person living with disability as a non-disabled person does not pay for parking permits;
- JFA also strongly recommends that the government not only look into the harmonisation of accessible parking permit schemes in Australia but also education for the community on who is eligible for a parking permit and the consequences of misusing a parking permit. In July 2006, CCS Disability Action in New Zealand undertook a campaign to look at the improper use of disability parks. A survey was undertaken and it was found that 40% of cars parked in a disability park did not display a permit. The same survey was undertaken in 2008 after the introduction of increased fines with the number of people parking illegally decreasing³;

³ CCS Disability Action including all people 'Mobility Parking', viewed 1/7/09, <<http://ccsdisabilityaction.org.nz/Support/MobilityParking/tabid/75/Default.aspx>>

- JFA recommends the introduction of a cross referencing system to assist with minimising the misuse of parking permits in situations where a person living with disability passes away and family members or support workers continue to use the permit.

Thank you for taking JFA's views into consideration with this submission on harmonising accessible parking schemes in Australia.