Transport and Main Roads
Disability Parking Permit Scheme Policy
DPPS_Policy@tmr.qld.gov.au

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Disability Parking Permit Scheme Review 2026

Dear Transport and Main Roads Review team,

Thank you for the opportunity to provide feedback on the review of the Disability Parking Permit Scheme 2026.

Council on the Ageing Queensland (COTA Queensland) supports the review and welcomes the opportunity to improve equitable access to community facilities and services for people living with disability, including older Queenslanders experiencing changing capacities (including considerations regarding physical capacity, mobility, sensory, neurological and cognitive conditions).

Our response is informed directly by the lived experience of older Queenslanders, older advocates, and sector representatives through our current and previous engagement, research and policy work. Collectively, what we have heard is that disability parking is a critical enabler of maintaining safety and independence for older people and those who support older people and enables participation and access to healthcare and community services, essential services, social supports, and everyday activities.

COTA Queensland strongly supports a Disability Parking Permit Scheme that is accessible, flexible, and grounded in functional needs, which also takes into consideration rapid technological development and future generations of older people living with disability and changing capacities (e.g., uptake of electric vehicles, e-mobility - personal mobility devices, assistive technologies, mobility devices and mobility aids).

Eligibility criteria

COTA Queensland supports broadening eligibility criteria beyond mobility and vision impairment to include neurological, cognitive, behavioural, sensory, and hearing-related conditions where living with disability and changing capacities create functional barriers and/or safety risks in navigating car parks in shared traffic environments, high transit spaces, and heavily built-up areas e.g., large scale retail precincts.

Older people and people living with dementia, neurological conditions, sensory impairments, people who live with high anxiety, daily fatigue associated with health condition, or fluctuating mobility may experience difficulty safely navigating busy parking environments, particularly

where reaction time, balance, spatial awareness, judgement, or sensory processing are affected.

Importantly, through our community insights, people have noted that older people may not identify themselves as living with disability while they are still experiencing significant functional limitations and safety risks.

COTA Queensland supports an approach focussed on functional impact (not just diagnosis alone). In addition, any broadened eligibility criteria should remain supported by appropriate health assessment.

Application process and communication

While some people have indicated that the application process was relatively straightforward, issues with the application process and with communications, have been identified.

For example, older people have experienced frustration with renewal processes, administrative burden, delays, and accessibility barriers. Examples of specific issues raised include:

- the requirement for repeated medical assessments for permanent conditions
- difficulty navigating application pathways
- overreliance on digital systems
- limited flexibility in communication methods, and
- uncertainty about where to seek assistance when support is needed.

COTA Queensland recommends that there is provision for multiple accessible pathways for disability parking information - for information seeking, customer communication with Transport and Main Roads, and the application process including online, email, phone, post, and in-person options.

Clear, plain-language information should also be made available to support customers and applicants who are culturally and linguistically diverse, live with lower levels of literacy and/or lower levels of digital literacy, live with cognitive or sensory disability, or who have limited access to technology.

Permit duration and permanent disability

There is strong feedback from community and sector regarding support for permanent permits for people living with disability or long-term conditions that are permanent or unlikely to change over time.

People have described the reassessment requirements (the repeated processes) as unnecessary, stressful, and burdensome with one person noting, “If I need a disability permit, it is an ongoing condition. It’s not going to get better any time soon.”

Feedback also highlighted frustration where renewal delays resulted in permits expiring before replacement permits were received.

COTA Queensland therefore supports:

- permanent permits for permanent disability or long-term conditions
- simplified renewal processes
- minimising unnecessary reassessment requirements, and
- administrative flexibility to avoid gaps in permit validity.

Permit use by organisations, carers, and support people

COTA Queensland supports maintaining access for organisations, carers, family members, and support services who work with and transport people living with disability and changing capacities.

Some cohorts of older people rely on others for transport to medical appointments, shopping, social participation, and essential services. Community feedback indicated that requiring individuals to always physically provide their own permit may create unnecessary burden or confusion, particularly for people living with cognitive impairment, frailty, or fluctuating capacities.

Consideration should therefore be given to how organisations and support people access disability parking permit information, arrangements, etc. on behalf of the person they support e.g., arrangements for eligible community transport, disability support, and aged care organisations.

Permit misuse, enforcement, and community awareness

Community members expressed frustration regarding misuse of disability parking spaces leading to no or limited availability of parking spaces.

Concerningly, some permit holders reported experiencing abuse or judgement while legitimately using disability parking spaces, particularly where they described their disability or capacities changes as not being immediately visible to others.

COTA Queensland therefore supports balanced enforcement approaches that both reduce misuse of disability parking spaces and improve community understanding of diverse cohorts of people who live with disability, fluctuating chronic health conditions, and changing capacities.

There was cautious support for modernised verification systems, including QR codes or digital permit verification, provided these systems remain accessible, optional, and do not create additional barriers for older people or people with low digital confidence.

Future-proofing accessibility

In addition, feedback also highlighted the importance of ensuring the Disability Parking Permit Scheme remains responsive to changing community needs and technologies now and in the future. We also acknowledge the great importance of future-proofing the current development and upgrades to Southeast Queensland train stations, major transport hubs, and the planning and development of transport infrastructure for Brisbane 2032 (Paralympics and Olympics).

Specifically, people have told us that this needs to include considerations around:

- guide dogs and transfer space requirements
- larger mobility aids and assistive technologies
- age-related mobility changes
- electric vehicle usage and charging infrastructure
- safe loading and unloading areas, and
- (for the future, ensuring) application of universal design principles in parking and shared traffic spaces.

Finally, we acknowledge that while number and placement of disability parking bays are outside the scope of this review, community feedback consistently highlighted that permit reform alone cannot fully address accessibility without consideration of safe pathways, transfer space, proximity to services, and physical safety in parking environments.[1]

We encourage the continued collaboration between Transport and Main Roads, local governments, accessibility advocates, and organisations who support accessible and age-friendly transport environments (including active transport) more broadly.

We welcome the review and support reforms that improve accessibility, fairness, safety, and usability of the Disability Parking Permit Scheme particularly in expanding eligibility based on functional impact, permanent permits for permanent conditions, accessible and flexible communication pathways, continued support for carers and organisations, balanced enforcement and misuse prevention measures, and future-focused, inclusive approaches to accessibility.

Yours sincerely,

Stephanie Power

Senior Policy and Research Officer
Council on the Ageing Queensland | www.cotaqld.org.au | policy@cotaqld.org.au

[1] This response has been informed by engagement via email with older Queenslanders on disability parking, the lived experiences of older Queenslanders from community engagements, the views and evidence shared from ageing and disability sectors, previous submission and research work including:
Council on the Ageing Queensland. (2025). *Disability Parking Time Limits*. [Confidential letter of response, 10 September 2025]. Transport and Main Roads consultation.
Council on the Ageing Queensland. (2026). *Disability Parking Permit Scheme Review 2026*. [Email correspondence with older community advocates, May 2026]. Consultation by Council on the Ageing Queensland to inform the Transport and Main Roads consultation on the review of the Disability Parking Permit Scheme.