

# Review and Analysis of Disabled Persons' Parking Permit Scheme in Ireland

March 2007



Submitted to  
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**Minister of Transport and the Marine**

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# Introduction

Irish Wheelchair Association (IWA) is the national organisation representing people with limited mobility in Ireland.

IWA has, for a number of years, serious concerns in relation to the number of Disabled Persons Parking Permits in circulation and the medical criteria used for issuing of these permits. Although IWA is one of the agencies authorised to issue the permits, at this juncture we seriously question the scheme's ability to fulfil its designed function. IWA constantly receives representations from its members and the general public in relation to:

- the growing number of permits in circulation versus the number of accessible parking bays
- the perception that people without severe mobility impairment are able to acquire permits
- the misuse of these permits.

Following many years of lobbying for a review of the current system for issuing Parking Permits, the Department of Transport committed to complete a report before the end of 2006, as outlined in the Sectoral Plan.

The main purpose of this report is to influence and assist the Department of Transport's promised review, while ensuring that the full picture of the issues are presented from an organisational and member point of view. Considering IWA's expertise and experience in the field, the organisation is in a strong position to advise on and influence change.

The Parking Permit scheme was born out of a basic necessity to maintain independence for people with limited mobility. A person with a disability requires access to a disabled parking bay because of its size (accessible parking bays are larger than the standard parking space) and their proximity to daily facilities. This gives vital access to: work, shops, bank, social events, etc that would otherwise severely restrict people with disabilities' entitlement to participate in mainstream life. The entitlements attached to these Parking Permits have made them a desirable commodity and therefore, unfortunately, open to abuse under the current system.

As one of the authorised bodies for issuing EU Disabled Persons Parking Permits, IWA has undertaken to review and analyse the current Parking Permit scheme. This review will highlight the many social issues that surround the Parking Permit scheme and will put forward recommendations to improve and strengthen the current system.

# Background to the Report

Irish Wheelchair Association (IWA) and the Disabled Drivers Association (DDA) are the main authorised bodies that issue EU Disabled Persons Parking Permits on behalf of the Minister for Transport since 1997 (Ref.1).

A significant change has occurred since IWA's initial commitment to the scheme. The local authorities have ceased to operate as an administrative body issuing Parking Permits. The current EU Parking Permit is significantly different to its predecessor because it is operated under EU regulation and is valid in all EU states.

As the Department of Transport's acting body for the Parking Permit scheme, IWA has examined, reviewed and reported to the Department since 1997. Through this process IWA has consistently highlighted their serious concerns in relation to the criteria and the process for issuing Parking Permits. This communication has now paid dividends. As already acknowledged, in September 2006 the Department of Transport made the commitment to the carryover review of Parking Permits in the Sectoral Plan. This step was announced by the Minister of Transport at Dáil question time:-

*'the present statutory scheme for grant and use of Parking Permits is under review in my department in consultation with the relevant bodies with a view to strengthening the provisions further and to ensure that the scheme is confined strictly to those who meet the restricted mobility criterion'.*

Minister of Transport Martin Cullen Dáil Debate Vol. 625 10/10/2006

In support of this new development IWA have committed to compile its own review on the current system for issuing Parking Permits.

This review will be instrumental in:-

- ensuring that the issues and views of the organisation and its members are comprehensively represented
- as a key implementer in the Parking Permit scheme IWA will influence positive change to improve and strengthen the current system.

IWA provides a broad range of services for people with mobility impairment in the community. The administering of the Parking Permit scheme is just one section of the organisation's expanding Mobility and Transport Service. These two factors place IWA in a position of knowledge and experience to carry out a review and analysis of the Parking Permit scheme.

This review and analysis process was conducted through the examination of the scheme and by identifying the defects in the current system:-

- views and concerns were brought forward by representation from IWA members and the general public.
- views and issues were brought forward by government authorities; Garda, traffic wardens, GP's etc.
- internal review of IWA current operational procedures for issuing the Parking Permits.
- IWA examined successful international and European models of good practice. These models have informed and shaped the report's recommendations.

Completing this work has highlighted the defects in the current system for issuing Parking Permits and provided a platform from which to devise possible solutions. In addressing these issues IWA has made a series of recommendations throughout the report.

# 1 The Current Criteria for Issuing Parking Permits: Issues and Concerns

## 1.1 Summary of the Issues:

- **Significant Increase in Requests for Parking Permits**  
The significant increase in the number of Parking Permits being requested by the public.
- **Accessible Parking Spaces**  
There has been no relative increase in the number of disabled spaces to correspond with the increased number of Parking Permits being issued.
- **Medical Criteria**  
The current medical criteria's lack of definable parameters has led to liberal interpretations by GPs. This has resulted in people with very minor conditions or disabilities receiving Parking Permits.
- **Validation period of a Parking Permit**  
The validation period of a Parking Permit for a Primary Medical Certificate holder needs to be reviewed.
- **Abuse of the Scheme**  
The current entitlement to free parking for holders of Parking Permits has led to open abuse of scheme.
- **Fraudulent use of Parking Permits**  
An increasing lack of credibility has become synonymous with the Parking Permit scheme. This social phenomenon is a direct consequence of the issues that have been raised above. The abuse of Parking Permits by a card holder's family and or friends further compounds this current situation.
- **Lack of Enforcement**  
There is a total lack of enforcement in relation to the abuse of Parking Permits and illegal parking in accessible spaces.
- **Lack of a coordinated approach**  
Currently no forum is in place with representation from all relevant parties involved in the Parking Permit scheme. This has created an uncoordinated approach in addressing the issues.

## 1.2 The increased numbers of Parking Permits being issued

In Ireland today there are over 30,000 Parking Permits in circulation (*IWA data*). As a key implementer of the scheme IWA has witnessed a dramatic increase in the wider general public applying for Parking Permits in recent years.

As part of the IWA review we have estimated that 10% of the current Parking Permit holders have a Primary Medical Certificate. This group of applicants meet the full criteria in their application and are not required to obtain a doctor's certificate, (Appendix 1). The remaining 90 % are non Primary Medical Certificate applicants. This group of applicants are required to obtain a doctor's certification as part of the criteria process. IWA can correlate from its review that the high increase of applications from this group is a direct outcome of a defect in the medical criteria. (Issue 1.3)

This defect has been instrumental in the significant increase in the number of Parking Permits in circulation. A direct result is the imbalance of available accessible parking spaces to the number of Parking Permits in circulation. Therefore a person with a genuine mobility impairment wishing to avail of an accessible parking space finds it extremely difficult to do so.

It cannot be over emphasised that the issue of parking is not merely just a matter of access to a parking space. It is an issue of equality and opportunity, as this gives a person access to all aspects of life; work, social and daily living facilities.

IWA envisage that to continue distributing Parking Permits under the current system will have a detrimental effect on the very people IWA represent.

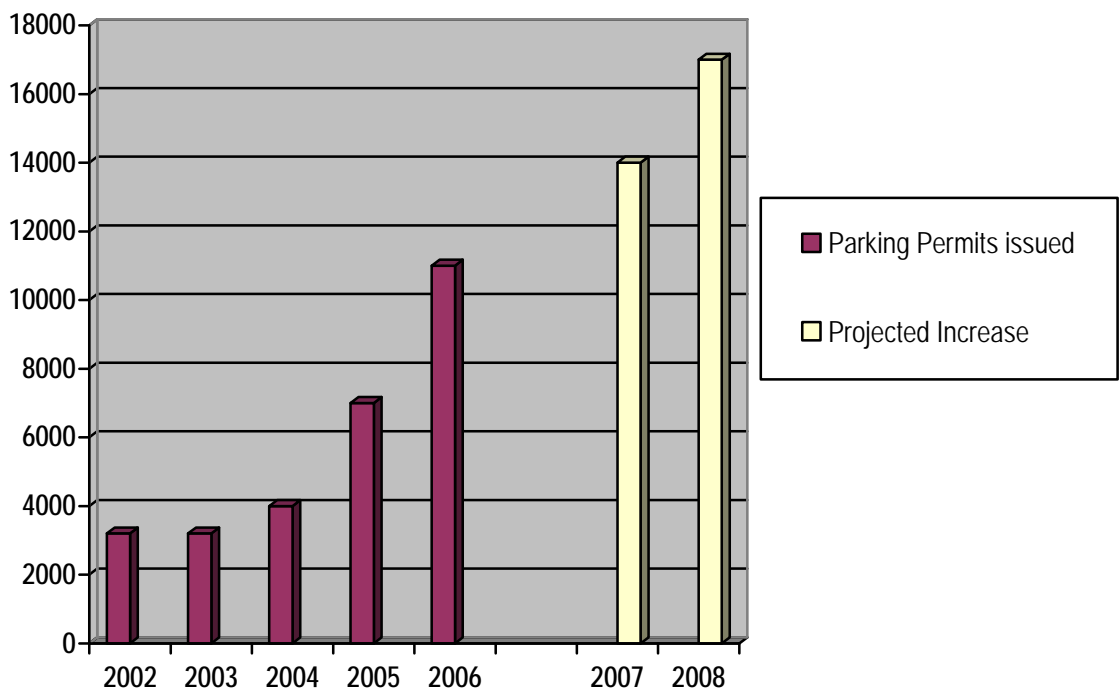
IWA has concluded the reasons for the significant increase in the demand for Parking Permits are:-

- a direct relationship to the broad and unguided interpretation of the schemes medical criteria
- the attractive entitlement of free parking for the Parking Permit holder
- parking spaces are at a premium in our developing towns and cities.

Other contributing factors that need to be acknowledged are:-

- the increased demand for disabled Parking Permits from Ireland's growing elderly population
- the increased public knowledge regarding the considerable benefits a disabled Parking Permit provides.

**The number of Parking Permits issued by IWA during the period 2002- 2006, and the projected increase for the period 2007-2008 at the current rate of demand.**



## Accessible Parking Bays

No uniformity in parking bay design exists in Ireland today. A practical example of this is an accessible parking bay being adjacent to un-dished paths. This renders the parking space and access to that particular area completely useless to the very person it was designed for. Linked up planning and design would ensure access for all. The National Disability Authority (NDA) has called for this issue to be addressed in their review of the Transport Sectoral Plan (2006). Furthermore in this document the NDA has highlighted the lack of guidelines on good practice in relation to informing people as to where such facilities are located in a given local authority area.

**Recommendation:** Accessible Parking Bay

IWA calls for Local Authorities to meet the requirement of implementing access audits in line with Disability Act 2005. This process will enforce universal design, access for all and ultimately meet the requirements of people with limited mobility.

*A disabled parking bay is not a luxury; it's a basic necessity to maintain independence' - IWA Member.*

### 1.3 Parking Permits Medical Criteria

In order for an applicant to obtain a Parking Permit they must meet the medical criteria on the application form (Appendix 1) by presenting:-

- (a) Primary Medical Certificate, *or*
- (b) Completed Doctor's Certificate

A Primary Medical Certificate can be obtained from the Director of Community Care. To be eligible for a Primary Medical Certificate the applicant must have a permanent disability and his / her disability must severely limit their mobility. The holder of a Primary Medical Certificate is also entitled to; VRT and VAT relief on the purchase of a vehicle, free road tax and a rebate on fuel duty.

In the case of applicant (B) the person is required to obtain a doctor's certificate. It is at this point that the process becomes far less stringent. Applicant (B) is not required to have a permanent disability nor is the applicant's mobility required to be as significantly impaired as with the person with the Primary Medical certificate holder.

While the medical criteria is clearly defined for applicant (A) the medical criteria for applicant (B) is vague and open to loose interpretation. This can clearly be illustrated in the criteria's use of the term 'respiratory and cardiovascular difficulties'. With no guidelines attached to the criteria this broad term facilitates further numbers of the population being deemed eligible for the scheme. The Australian model from Victoria (Appendix 3) makes provision for guidelines to support medical personnel through the medical criteria. This model has proved effective in standardising the eligibility criteria.

In order to illustrate the sheer complexity created by the current medical criteria IWA has provided a detailed breakdown of all the medical conditions that are currently identified in group (B) non primary medical certificate holders (Appendix 2).

The medical criteria is the core issue in the Parking Permit scheme that needs to be addressed. The deficits of the application process with regard to the guidelines for the medical criteria have created a system that is effectively working against the people for whom it was originally designed.

## IWA Consultation with General Practitioners

GP's regularly contact IWA with regard to their patients who have not the Primary Medical Certificate stating that they are put under pressure to sign the aforementioned doctor's certificate. This constant feedback from GPs has revealed their concerns and doubts about whether a person matches the medical criteria for the Parking Permit. At this point it would be prudent to state that it is not the role of IWA to adjudicate once they have received the doctor's certificate.

In response to this feedback IWA contacted the Irish Congress of General Practitioner Association (CGPA). It quickly became apparent that the two organisations shared the same concerns and issues in relation to the current system. It was agreed that change was needed to improve the current process of an applicant requesting their GP to sign the doctor's certificate and to the medical criteria itself.

In a letter to the Department of Road Safety in October 2006 Dr. G. Ronan of Irish Congress of General Practitioner Association (CGPA) stated:-

*'...the application is extremely broad, as a result of which we are constantly being pressurised to approve applications for the DPP which we feel do not meet the criteria of 'disabled'. These people do have some disability, i.e. heart failure, but are stable and mobile..... ..the criteria needs to be more defined in order to reduce the abuse of the DPP. It would be an advantage to have an independent medical assessor for these permits; this would remove the conflict between us and our patients.'*

Dr. G. Ronan concludes the letter by calling on the department to set up a consultation group representing all parties to address the issues.

### **Recommendation: An Independent Assessor**

IWA strongly recommends the examination of the medical criteria in order to address the liberal interpretation currently being operated in the Parking Permit application. In order to achieve this, non primary certificate applicants would no longer have the doctor's certificate completed by their own GP. The applicant would instead go to an appointed independent medical person. This role could be facilitated in a number of ways including:-

- (1) a pool of geographically placed General Practitioners appointed by the Department of Transport
- (2) by other medical personnel; Director of Community Care, a non community based doctor, Occupational Therapist, etc.

The creation of an independent and informed assessment process would ensure standardisation of the medical criteria.

This recommendation is supported by the Disabled Persons Transport Advisory Committee (DPTAC) in their 'Review of the Disabled Persons Parking Card System' (Blue Badge Scheme). They state:-

*"DPTAC agree with the `slight majority' of respondents that the assessment should be undertaken by a health professional other than the applicant's General Practitioner (GP). Removing the GP from the process will also reduce the burden on GPs and is supported by the British Medical Association"*

DPTAC Review of the Disabled Persons Parking Card System 2.3.4. 2001



*The Disabled Persons Transport Advisory Committee (DPTAC) was established in 1986 to provide independent advice to British Government on the transport needs of all disabled people (Transport Act 1985).*

**Recommendation:** Medical Criteria Guidelines

IWA strongly recommends that in order to support the establishment of clear medical criteria in the application process for a Parking Permit, a comprehensive set of guidelines must be developed to support medical personnel. These guidelines will be instrumental in setting a criteria standard in particular for such terms as 'cardiovascular and respiratory conditions'.

## **1.4 Entitlements to Free Parking**

The dramatic increase in the volume of traffic is constantly in the news. In order to meet this challenge many towns and cities have introduced pay parking as one of the solutions. IWA offices are experiencing a direct correlation between town/city introducing on-street parking charges and the significant increase in Parking Permit applications from said town/city. The increase in demand is clearly aligned to the fact that holders of the permits are entitled to free parking in any public parking space. The Parking Permit has become a very valuable and desirable commodity. If used Monday to Friday, 9 to 5 in a fee parking area a person using a disabled Parking Permit would make a saving of up to an average of €80 a week.

Internationally concessions attached to a Parking Permit vary and often only apply to the region of issue. These concessions include a disabled Parking Permit holder parking in public spaces free for a limited period of time; ranging from two to three hours. Similarly, a Parking Permit holder pays the standard parking fee but is designated double the period of parking time.

### **Parking Permit entitlements to free parking in European models**

As part of this review IWA looked to the experiences of Parking Permit holders across Europe. Although it is classified as an EU badge scheme, entitlements vary from country to country with certain jurisdictions restricting free parking to accessible parking bays. However in Ireland today this would only serve to increase the problem by placing a greater demand on the already limited number of accessible parking bays.

IWA anticipate that by adopting the recommendations for an Independent Assessor and Medical Criteria Guidelines (Issue 1.3) a significant reduction in the number of Parking Permits being issued would be experienced. This reduction in the number of Parking Permits been issued, could defer the consideration of removing the entitlements to free parking from Parking Permit holders.

The removal of the entitlement to free parking for permit holders could however cause considerable financial burden to many people with disabilities. People with disabilities face significant extra costs of living, which tends to rise with the severity of the disability. While incurring this extra financial cost would not be applicable to all Parking Permit holders, a system would have to be put in place to support people on low income or State benefit.

European models currently in operation provide support for disabled drivers/passengers through the provision of a subvention transport grant or a reimbursement payment to cover transport costs. The adoption of this type of payment in Ireland could be linked to the proposed cost of disability payments.

## **Recommendation: Parking Permit Entitlements**

The free incentive attached to Ireland's Parking Permit scheme has become attractive under the present climate and therefore open to abuse. Significantly the current eligibility criteria sees Parking Permits allocated to people with minor conditions and or disabilities who can then avail of the schemes entitlements. These factors place extensive demand on the limited number of accessible parking bays.

IWA considers that the most important issue for its members who hold a Parking Permit is to be able to access suitable parking facilities and not the entitlement to free parking. The removal of the entitlement to free parking must coincide with the implementation of a scheme to subsidise / reimburse Parking Permit holders on lower income or on State benefit.

As part of these recommendations the following access issues must be addressed before the entitlement to free parking could be removed:-

### **Recommendation: Universal Access**

All stations / machine for issuing parking tickets must be accessible to wheelchair users and to people with limited mobility. Accessibility must include the route from the parking bay to the pay station / machine and that the pay station / machine itself would be universally accessible and user friendly.

Ensuring access for all would clearly be a major undertaking for any local authority. However this crucial step must be taken before the entitlements to free parking could be removed.

This recommendation is supported by IWA's knowledge of innovative solutions e.g. In-vehicle electronic parking meter (EPM) & Smart Cards that have already been developed to address universal access issues raised. These practical innovations are cost effective, efficient systems that would be attractive to all local authorities. New technology can introduce a pre-paid ticket that can be scanned, entitling the holder to X period of parking time. Such a system would take away the considerable problems a person with limited mobility faces when trying to access a parking ticket station / machines.

## **2 Parking Permit Validation Period**

IWA currently issues Parking Permits to applicants for a period of:-

- five years to Primary Medical Certificate holder
- two years to non Primary Medical Certificate holder

The Disabled Drivers Association issues cards for two years to primary medical certificate holders in accordance with the 1997 legislation (part 4). By increasing the validation time to five years IWA are aware that they are currently operating outside the 1997 legislation. This informed decision was taken in light of the fact that a Primary Medical Certificate holder's medical condition will not change. This practical implementation benefits the applicant as they no longer have to undergo the unnecessary expense and inconvenience of renewing their Parking Permit every two years. Additional benefits are also experienced by IWA as precious resources are freed up to deal with the considerable amount of new applications being received daily.

### **Recommendation: Validation period of a Parking Permit**

IWA petitions the Department of Transport to review its current legislation in relation to the period of time a Parking Permit is valid for Primary Medical certificate holder.

The Australian authorities of Victoria (Appendix 3) and Queensland (ref. 2) issue two types of Parking Permits which are colour coded depending on the nature of the applicant's disability. As part of this report IWA recommend that this type of model is considered by the Department of Transport in their review process.

### **3 Penalties and Enforcement**

A fixed charge system was introduced into legislation to act as a deterrent against the abuse of the designated accessible parking bays. However a lack of enforcement sees IWA offices constantly inundated with calls from card holders and the general public on illegal parking in accessible parking bays.

#### **Primary legislation provides for substantial fines**

Extensive primary legislation exists but to IWA's knowledge the maximum fine has never been enforced. The legislation states:-

Under the Road Safety Act the maximum monetary fine that a court can impose on conviction of an offence under section 115 is €1,500 since 2002. Section 115 provides that a person who is guilty of an offence under this section: *'shall be liable on summary conviction to a fine not exceeding €1,500 or, at the discretion of the court, to imprisonment for any term not exceeding 6 months or to both such fine and such imprisonment'*. Furthermore, by the end of 2006 an amendment to section 115 of the Road Traffic Act 2006 will make provision to double the maximum fine to €3,000.

Minister of Transport Martin Cullen, TD Dáil Debate Vol. 625 10/10/2006 stated:

*'To assist the bodies who issue the permits and the authorities who enforce the parking law to safeguard the scheme against abuse another measure that I advanced is the amendment of section 115 of the Road Traffic Act 1961 that is provided in Section 20 of the Road Traffic Act 2006'*

The fact that the government would amend the legislation in 2006 highlights the gravity of the current abuse of illegal parking.

Similar to all legislation, until it is rigorously enforced, this legislation will not be a deterrent to the growing misuse of Parking Permits and illegal parking by the public.

#### **Recommendation: Penalties and Enforcement**

##### **Enforcement of Government Legislation**

IWA calls on authorities to enforce the current fines that have been legislated for by the government in Road Traffic Act 2006. An active campaign in issuing substantial fines will achieve social awareness and deter citizens from illegal parking.

##### **Penalty Points**

Additionally, IWA strongly recommends that citizens who commit the offences outlined in Government's Road Traffic Act 2006 should incur a minimum of two penalty points on their driving licence for a first offence. Further abuse of the Road Traffic Act in relation to Parking Permits should incur further penalty points for every re-offence a person commits.

## 4 Fraud

With the current design of the Parking Permit it can be difficult to establish whether the driver or passengers, if either, are actually the holder of the Parking Permit. IWA believes there is significant misuse of the Parking Permits currently in circulation.

Section 115 of the Road Traffic Act makes provision for fraud: *'it is an offence to knowingly give particulars that are false or misleading in connection with an application for a permit and that it is an offence to forge or fraudulently alter or use any permit, or fraudulently lend to, or allow a permit to be used by, any other person'.*

IWA's investigation into the issue of fraud has not yet discovered any successful prosecutions under Section 115 of the Road Traffic Act.

Resulting from Dublin City Council Parking Bye-laws 2005 (Page3.3.1) a report '*Dublin City Council Parking Bye-laws*', presented evidence on the parties involved in the misuse of permits:-

*'Family members or associates of disabled persons in respect of whom a permit has been issued can use the permit when the disabled person is not a driver or passenger in the vehicle. While the permit contains a photograph of the disabled person this is not visible when the permit is displayed correctly on a vehicle. In addition, there is no vehicle registration number on the permit as it attaches to the individual in respect of whom it was issued and not to a particular vehicle. The restriction that a permit can only be used when the vehicle is parked for the convenience of the person for whom the Permit was granted is in practice completely unenforceable.*

*- in some cases Permits..... are not being surrendered on the death of the disabled person and continue to be used by individuals who are not entitled to use them and there is evidence that permits are being stolen and used by individuals with no entitlement to use them'.*

IWA has learned that in the next new Road Traffic Legislation the government propose to provide for an express power of seizure for Garda and traffic wardens in respect of any permit that they have reasonable grounds to suspect is being illegally used. This provision would be welcomed by IWA as it will be effective in taking illegally held permits out of circulation.

### **Recommendation: Fraud**

#### **Enforcement of Government Legislation**

IWA calls on authorities to enforce the current fines that have been legislated for in the Road Traffic Act 2006 against the fraudulent misuse of Parking Permits. An active campaign in issuing substantial fines will undoubtedly achieve social awareness and deter citizens from the fraudulent misuse of Parking Permits.

#### **Penalty Points**

Additionally, IWA strongly recommends that citizens who commit the outlined offences should incur a minimum of two penalty points on their driving licence for a first offence. Penalty points on a licence should increase for every re- offence a person commits.

## Lack of a coordinated approach

Currently no forum is in place with representation from all relevant parties involved in the Parking Permit scheme. This has had significant impact on the Parking Permit scheme; creating a lack of awareness of the issues and generating an uncoordinated approach in addressing the issues. In advocating for best practice a coordinated approach is called for to successfully implement and develop the Parking Permit scheme

## Recommendation: Coordinated approach

Representation from all the relevant parties involved in the scheme should establish a forum; Department of Transport, local authorities, medical profession, Garda, Parking Permit issuing bodies. These representatives would orchestrate a co-ordinated approach to the Parking Permit scheme. This structure would facilitate communication on issues such as a central database, a hot line to report fraud and ensure no duplication on areas of the Parking Permit scheme.

## 5 National Awareness Campaign

IWA recommends a National Awareness Campaign on the Parking Permit scheme funded by the Department of Transport as part of their strategic Plan. At a national level this campaign would raise awareness and provide information to the general public, Garda, local authorities, government bodies, service industry, traffic wardens etc. Such a campaign would be an effective tool in supporting the enforcement of current legislation.

A comprehensive campaign coordinated by an authorized issuing body would develop:-

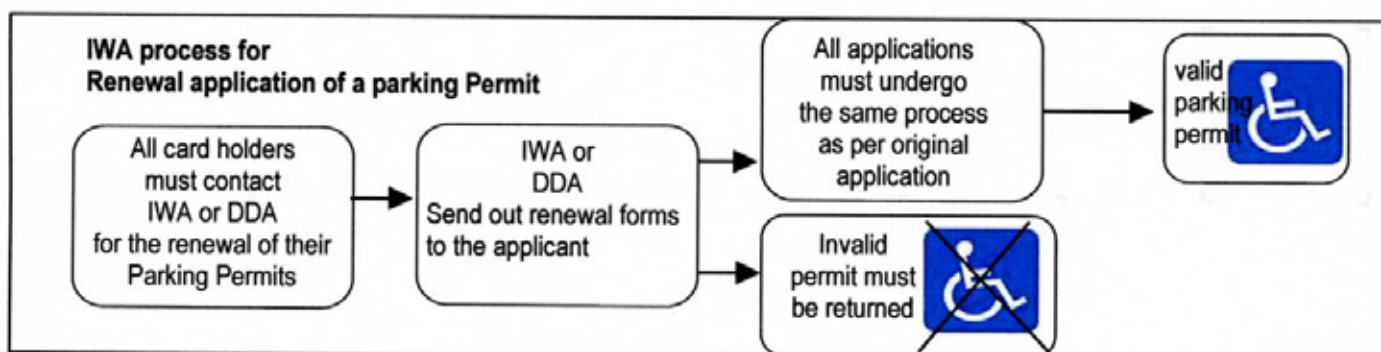
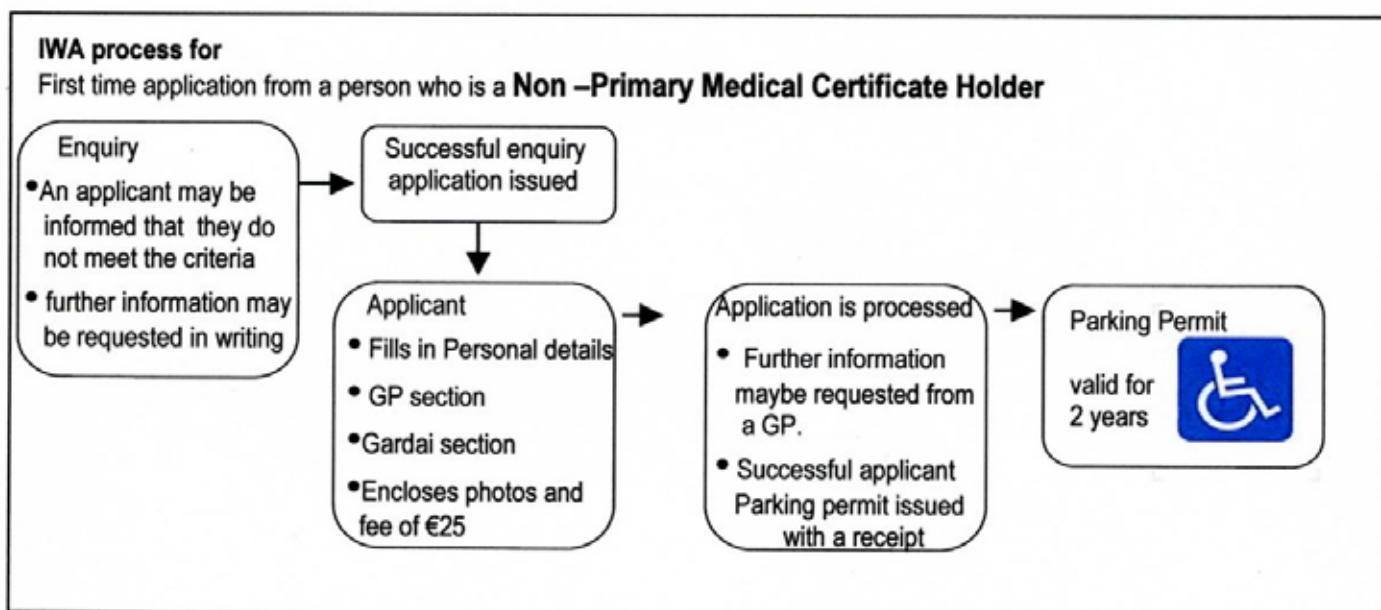
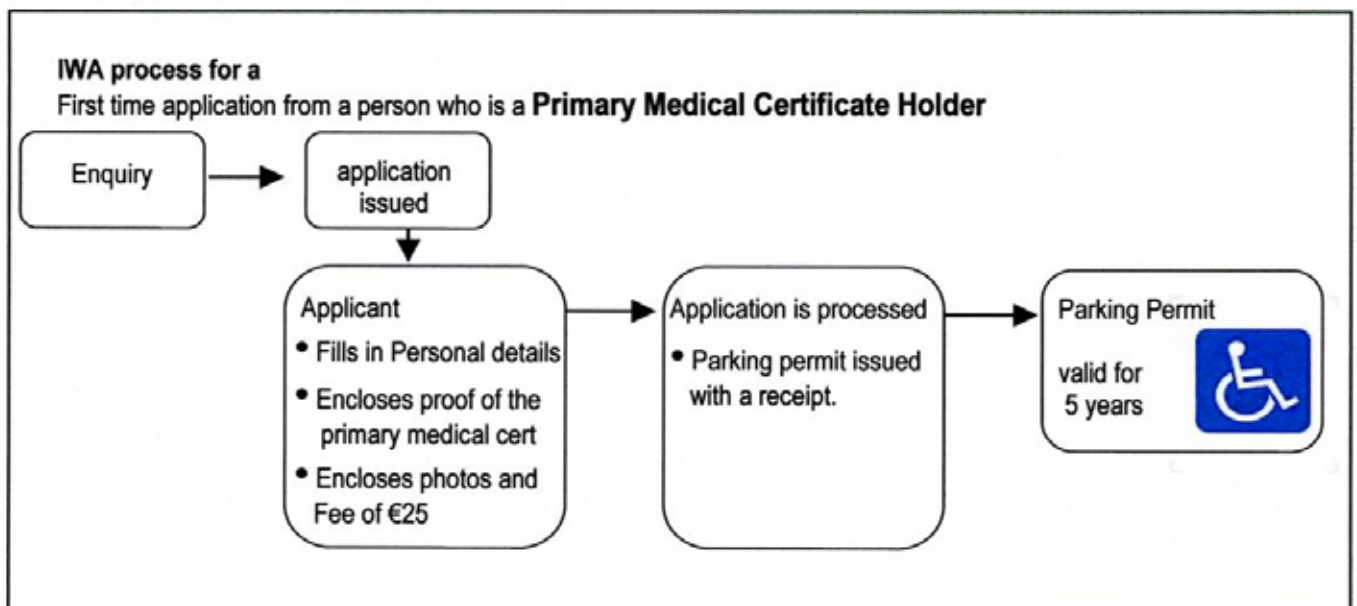
- information leaflets
- advertisement campaign ; bumper stickers, posters
- media coverage; radio, TV , newspaper features & adverts



Bumper stickers  
National campaign to raise awareness

## 6 Internal Review of IWA Current Operational Procedures for Issuing Parking Permits

### Irish Wheelchair Association's Internal Process for Issuing Parking Permits



## A. Request for an application form

An application form for the disabled persons Parking Permit can only be obtained from IWA National Mobility Centre in Clane. Forms are not available on line or from other IWA offices. At this first point of contact IWA engages with a person to provide information on the eligibility criteria. If a person's suitability is unclear the person is requested to submit in writing, details of their disability. The Disabled Drivers Association currently operates the same policy.

It should be noted that many people with very minor disabilities request application forms. Hence at this point of enquiry, IWA can support an applicant in identifying their ability to meet the medical criteria. While this process may appear to be time consuming, it is effective as a filtering system. It saves the applicant the time, expense and disappointment of going to the next stage of making an appointment with their GP to complete the medical form.

**Recommendation:** Reinforcing recommendation (Issue 1.3), IWA recommends the development of clear comprehensive guidelines on the eligibility criteria for Parking Permits. The standardisation of the process calls for strict guidelines so that informed decisions can be made by all parties involved in the Parking Permit process.

## B. Completing an application form for a person with:

- (i) Primary Medical Certificate, the applicant is required to:-
- fill in personal details
  - supply two passport photographs. One photograph is for IWA's records and the other is adhered to the Parking Permit.
- (there is no requirement to have GP or Garda sign the application form).

Completing an application form for a person with:

- (ii) Non Primary Medical Certificate, the applicant is required to:-
- fill in personal details
  - request their GP to complete the medical criteria section
  - the form must then be stamped by the Garda.
  - supply two passport photographs. One photograph is for IWA's records and the other is adhered to the Parking Permit.

Reinforcing recommendation (Issue 1.3) IWA recommends the development of clear comprehensive guidelines on the eligibility criteria for Parking Permits. The standardisation of the process calls for guidelines so that informed decisions can be made by all parties involved in the Parking Permit process.

## C. Fee

There is a fee of €25 incurred by all applicants. This fee covers the cost of the administration and issuing of the Parking Permit. IWA receives no funding from the Department of Transport in providing this public service to the community.

**Recommendation:** The cost should remain index linked.

## **D. On Receipt of Application Form**

Applications are checked for their full compliance with the details requested on the form. If an application is deemed incomplete in the medical section, a doctor will be contacted to clarify any issues that may have arisen. IWA's limited staff resources administering this service coupled with the large volume of applications they receive daily, impedes detailed systematic checks.

Recommendation: A comprehensive set of guidelines needs to be developed for the medical criteria; recommendation (Issue 1.3).

## **E. Issuing Parking Permits**

New applicants

IWA issues Parking Permits for five years to Primary Medical Certificate holders and for two years to non Primary Certificate applicants. The Disabled Drivers Association issues cards for two years to Primary Medical Certificate holders. The process of issuing the permits is supported by IWA's development of a Parking Permit database.

Renewal applicants

At the end of the validation period applicants must currently re-apply and repeat the whole process as per original application. Due to the limited resources in administering this scheme for the Department of Transport, IWA are not currently in a position to notify people of their due expiry date.

Recommendation: Given additional funding to make extra resources available, IWA would then be in a position to issue reminder letters enclosed with an application form to a card holder prior to the card's expiry date.

## **F. Renewal of a Parking Permit**

A person must re-apply for a new card when their Parking Permit has expired. On receipt of a new parking card IWA requests that all card holders return their out of date Parking Permit. Unfortunately our records show that large amounts of people do not comply, which leaves a substantial amount of permits unaccounted for. Due to IWA current staffing levels for this service they are currently not in a position to follow up on this issue.

Recommendation: IWA would administer a system that would systematically send notifications of unreturned cards that have expired. IWA will therefore inform all applicants that if they do not comply with the scheme's policy they may not be entitled to another Parking Permit once their current one expires.

## **G. Parking Permit Renewal**

All non Primary Medical Certificate holders renewing their card must undergo the same process as the original process and must bring the form to their GP and Garda as per first application.

Recommendation: the implementation of recommendation (Issue 1. 3) would see the renewal form's medical assessment carried out by an independent designated assessor.

## **H. Parking Permits lost or stolen**

All cardholders who report their cards lost or stolen to Irish Wheelchair Association are required to fill in a lost/stolen card form. This form must be stamped by the Garda and details of the lost /stolen parking card are entered on the Garda Pulse computer system.



## **7 Current Eligibility Parameters of the Parking Permit Scheme**

Internationally, the Parking Permit scheme was created in response to a disabled person's necessity to access a parking bay because of its size (accessible parking bays are larger than the standard parking spaces) and its location to work, social and daily living facilities.

Children under five years of age do not qualify for a Parking Permit because they would not normally be expected to be able to walk independently. Organisations that provide transport for disabled people, who meet one or more of the qualifying criteria, may be eligible to obtain a Parking Permit.

International and Irish practice in regard to the Parking Permits schemes makes no provision for people with psychological disorders, learning or behavioural difficulties such as Autism or Downs Syndrome unless their impairment causes very considerable and not intermittent mobility impairment.

Any changes in the system for issuing Parking Permits should not however prohibit anyone from applying.

## **8 Conclusion**

IWA conducted this review and analysis of the Parking Permit Scheme in Ireland in order to make clear recommendations to influence and shape the Department of Transport's sectoral plan. IWA strongly considers that the issues highlighted in this review need to be addressed in order to safeguard the ethos of the scheme. Through the implementation of the review's recommendations, the current Parking Permit system will become strengthened and improved.

IWA's review recommends that the core issue of the medical criteria be addressed with the introduction of an independent assessor coupled with the development of comprehensive guidelines.

In order to create equity amongst all citizens and safeguard accessible parking spaces for card holders, IWA recommends a review of the entitlement to free parking for Parking Permit holders. This recommendation should only be implemented in conjunction with a subvention/reimbursement scheme to support people on low income or State benefit.

IWA has called for the enforcement of the Government's current legislation in regard to illegal parking and fraudulent abuse of the Parking Permit scheme.

The report concludes its recommendations with a call for the development of a National Awareness Campaign. This would place information/clarification into the public domain on the function, application, eligibility and civic responsibility to adhere to the law in regard to the Parking Permit scheme. To ensure a coordinated approach in addressing the issues, IWA calls for a forum with representation from all stakeholders involved in the Parking Permit scheme.

The promised review of the Sectoral Plan has created an opportune time for the Department of Transport to address the scheme's many pressing issues. The adoption of IWA's recommendations into the Sectoral Plan will ensure the further successful development and implementation of a scheme that will ultimately benefit all card holders in the future.

## Appendix 1

### Current IWA Application Form for a Parking Card

## Appendix 2

### IWA Mobility Centre Data

Number of Parking Permits issued to applicants in Non Primary Certificate category. The chart illustrates the complexity & vastness of the conditions and / or disabilities being presented.

<b>Blood and Blood Forming Organs 3</b>	<b>Eye Complaints 1914</b>	<b>Neoplasm's 521</b>
Blood and Blood Forming Organs 3	Blindness caused by Diabetes 1	Cancer 521
<b>Circulatory System 1961</b>	Blindness/low vision not specified elsewhere 85	<b>Nervous System 6814</b>
Angina 170	Cataracts 1	Alzheimer's disease and other cerebral degenerations 89
Cerebrovascular Disease 183	Congenital anomalies of the eye (Ectopic Lens / Optic Nerve Hypoplasia) 2	Cerebral Palsy 891
Congenital heart Disease 89	Glaucoma 1	Diplegia (Paralytic Syndrome) 2
Coronary artery Disease 232	Macular degeneration 26	Dystonia 13
Hypertensive Disease 59	Unknown Diagnostic 1273	Encephalitis 1
Ischemic Heart Disease 978	Unspecified eye complaint 493	Epilepsy 52
Peripheral Vascular Disease 62	Visual Disturbances (Colour vision Disturbances) 32	Friedreich's Ataxia / Cerebral Ataxia 100
Unspecified circulatory system diagnostics categor1 88	<b>Genito-urinary System 100</b>	Guillian-Barre Syndrome 24
<b>Congenital 123</b>	Kidney Disease / Renal Failure (Renal Dysplasia)100	Head Injury 111
Chromosomal Anomalies 59	<b>Infections and Parasitic 207</b>	Huntington's Chorea 13
Other Congenital Anomalies 6	Lyme Disease 2	Hydrocephalus 26
Unspecified Congenital diagnostic category 58	Polio 205	Meningitis 7
<b>Digestive System 40</b>	<b>Musculo-skeletal System 7855</b>	Mononeuritis (Carpal Tunnel Syndrome / Femoral Nerve Damage) 1
Crohn's Disease / Colitis 7	Absence or loss of Extremity 639	Motor Neuron Disease 66
Intestinal Problems 1	Arthritis (other than rheumatoid) 1853	Multiple Sclerosis 1255
Liver problems (Hepatitis B / Hepatitis C) 24	Arthrogryposis 5	Muscular Dystrophy 80
Unspecified digestive system diagnostic Category 8	Back Problems 364	Myalgic Encephalomyelitis (M.E) 28
<b>Ear Complaints 2</b>	Connective Tissue 5	Myasthenia Gravis 8
Deafness not specified Elsewhere 2	Deformities / Malformation 4	Myellitis 1
<b>Endocrine and Metabolic 246</b>	Dwarfism 21	Myopathy 5
Diabetes 243	Hip Problems 676	Neuropathy 53
Metabolic disorders (Gout / Huirlers Synd / Maple-Syrup Kid Dis / PKU)2	Knee Problems 276	Paraplegic (Paralytic Syndrome) 305
Osteomalacia / Rickets 1	Musclar Atrophy 21	Parkinson's Disease and related Disorders (Progressive Supranuclear Palsy) 448
<b>Respiratory System 1662</b>	Osteo Arthritis 2021	Quadruplegia (Paralytic Syndrome) 116
Asthma 132	Osteomyelitis 3	Spina Bifida 394
Bronchitis / Emphysema (COPD) 1145	Osteoporosis 203	Spina Bifida and Hydrocephalus 14
Cystic Fibrosis 80	Permanent Injury to upper / lower limb 2	Spinal Injury 201
Lung Disease due to external Agents 81	Rheumatism 99	Stroke / Hemiplagia 2158
Unspecified respiratory System diagnostic category 224	Rheumatoid Arthritis 408	Unknown Diagnostic 300
	Scoliosis / Curvature of spine 49	Unspecified Nervous System (Cerebella Tremor / Frontal Lobe Dystrophy / Ar 52
	Unspecified Musculo-skeletal diagnostic category 1206	

<b>Skin Disease or Disorders 10</b>	<b>Other 242</b>	
Erythematosus Conditions (Lupus Erythematosus / Steven Johnson's Syn) 4	Autistic Spectrum Disorder 33	
Unspecified Skin Disease / disorder diagnostic 6	Dementia 17	
	Development Delay 34	
	Dyspraxis 2	
	Intellectual Disability 110	
	Schizophrenia 3	
	Specific Speech and language 2	
	Unspecified Mental Illness	

**Number of Parking Permits issued to applicants in the Primary Medical Certificate category from the period 1997- 2006.**

<b>Primary Medical Certificate</b>		<b>Blind Registered</b>	
Total Issued	2,033	Total Issued	606
1997	2	2003	3
1998	8	2004	104
1999	2	2005	286
2000	4	2006	213
2001	12		
2002	6		
2003	14		
2004	216		
2005	780		
2006	989		

## Appendix 3

Model of Disabled Persons Parking Scheme, Victoria, Australia.

[www.boroondara.vic.gov.au/](http://www.boroondara.vic.gov.au/)

**Extract from:** The Disabled Persons Parking Scheme, Boroondara, Victoria, Australia

**Part B** STATEMENT FOR COMPLETION BY A MEDICAL PRACTITIONER / SPECIALIST MEDICALPRACTITIONER / CLINICAL PSYCHOLOGIST

PLEASE NOTE: The information on this form will be used by Council staff to determine the eligibility of your patient for a Disabled Persons' Parking Permit. A permit will not be issued unless all details on the application are completed.

9. *What is your patient's disability?*

10. *Does your patient's disability require him / her to continually use an appliance for support to aid his / her mobility?*

11. *Does your patient require additional space to access his / her vehicle due to the disability?*

12. *Does the use of the aid cause your patient the need to use this space?*

13. *What appliance does your patient use as an aid?*

14. *Is the significant disability permanent? Yes /No  
If NO go to question 15. If YES go to question 16.*

15. *Is the significant disability likely to last less than six months? Yes/ No*

16. *Does your patient's disability result in extreme danger to themselves or others in a public place without the continuous attendance of a caregiver?  
Yes/No*

17. *Does your patient's disability affect their capacity to walk distances such that they require rest breaks? Yes /No*

18. *Does the disability affect their capacity to walk to such an extent that it may become severely injurious (as opposed to inconvenient) to their health?*

19. *Is the mobility aid consistent with the applicant's disability?*

20. *Additional supporting information known to you.*

**Extract from:** Victorian Disabled Persons' Parking Scheme  
Guidelines for Permits  
Information on making an application

Disabled Persons' Parking Scheme currently operates in Victoria. The Scheme provides for two permit categories with varying parking concessions, based on the applicant's need for assistance.

Under category one (blue permit), permit holders with significant intellectual or ambulatory disabilities who meet the eligibility criteria are entitled to park a vehicle in a special bay reserved for people with a disability only, for the specified time only, or may park a vehicle in any ordinary area or bay for twice the specified time (upon payment of any initial parking fee, if applicable).

Under category two (green permit), permit holders who require rest breaks when walking may park a vehicle in any ordinary area or bay for twice the specified time (upon payment of any initial parking fee, if applicable). The permit label should be carried by the permit holder when he / she is not being transported in a vehicle. Permits must not be left on display when the vehicle is not engaged in the process of transporting a permit holder.

**Category two permit holders are not permitted to park in special disabled persons' parking bays.**

#### **Types Of Permits Issued**

Code A for a driver / passenger who has a disability;

Code B for a passenger who has a disability;

Code C for an organisation providing a transport service for people with disabilities;

Code D for a temporary permit.

## References

### Reference 1:

The Minister for Transport regulates traffic, parking and road traffic signs under the Road Traffic Acts 1961 to 2005.

The Road Traffic (Traffic and Parking) Regulations 1997 provides for the operation of disabled persons' Parking Permits in Ireland. These permits may be issued by local authorities, the Irish Wheelchair Association and the Disabled Drivers Association. The permits have national application. Permits are granted to eligible disabled persons (a disabled person means a 'person who is suffering from a disability that prevents that person from walking or causes undue hardship to the person in walking) and may be issued to a disabled person who is a driver or to a disabled person who is a passenger.

### Reference 2:

Model of; Disability Parking Scheme, Queensland, Australia.

[www.transport.qld.gov.au/](http://www.transport.qld.gov.au/)

### Main References:

Department of Transport (2006) '*Transport Access for All*' Sectoral Plan for Accessible Transport Under the Disability Act 2005

Disabled Persons Transport Advisory Committee (2001) '*Review of the Disabled Persons Parking Card System*' 2.3.4.

Dublin City Council (2005) '*Dublin City Council Parking Bye-laws*' (Page3.3.1)

National Disability Authority (2006) '*Review of the Department of Transport Sectoral Plan*'.



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