

# SATA

## Scottish Accessible Transport Alliance

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Scottish Charity No SC027600

### Scottish Government Consultation on *Designing Streets* - SATA's response

#### Section Number

#### Comments

General

SATA represents the interests of disabled people in achieving accessible transport services and thereby greater mobility. To this end the design of streets and the whole transport environment to make them barrier-free and user-friendly is of the utmost importance. What matters for people is their whole journey from start to finish, however short or long. **We therefore welcome this policy document as an important contribution to "bringing about a transformation in the quality of streets" (Section 2.1.1). However, we wonder how far disabled people were involved in its production.**

We note that *Designing Streets* is said to be 'also applicable to existing streets' (Section 2.1.3) and in other parts of the document there are references to the importance of maintenance, the reduction in clutter, etc etc. We think that the title '*Manual for Streets*' for the previous England and Wales document, on which this is based, is much better. **We consider that there is an overwhelming need to improve existing streets, especially walkways.**

#### Streets in Context

1.1.2

We fully agree that 'access to buildings and public spaces is another important function of streets and the pedestrian environment should be designed for people of all ages and abilities' and **this must include disabled and elderly people with reduced mobility.**

1.3.2-3

More stress could be paid on the value of streets as places to be in their own right. Getting out of doors brings both physical and mental health benefits. Good design should make this easy and enjoyable.

1.5.3

All policy, guidance and regulations should be based on sound research and evidence.

1.8.1

We very much welcome the reference to the Disability Discrimination Act 2005 and the need for road and planning authorities to comply with the Disability Equality Duty under the Act and the six principles, **including the importance of involving disabled people.** The reference to the DRC's *Statutory Code of Practice on the Disability Equality Duty and its specific guidance for those dealing with planning, buildings and the street environment is very important.*

1.8.2

Following our general comments above, we highlight the statements that **'there is an expectation of positive action', that 'the duty (under the DDA) is retrospective', and that 'local authorities will be expected to take reasonable action to rectify occurrences of non-compliance in existing areas'.**

## Key Principles

- 2.1.3 Again, this section contains the statement that '*Designing Streets* is expected to be used predominantly for the design, construction, adoption and maintenance of new streets, but it is also applicable to existing streets'. **We would give the importance of guidance on how to improve and maintain existing streets equal emphasis.**
- 2.1.4 The special needs of pedestrians with sensory impairments or who use walking aids should be mentioned. Also disabled people who use scooters and those require car parking spaces opposite their homes. **We ask that this be included.**
- 2.1.5 The above comments should also be included under 'all modes of travel' by elderly and disabled people to allow them to move around easily and get to where they want to go.
- 2.4.1 Once again, '**modification of existing streets**' as well as the planning, design, approval or adoption of new streets is mentioned. Also that 'disability and other user groups' should be aware of *Designing Streets*. **It is important for all professionals to identify and support such groups which already exist, such as local access panels, but also when necessary to take active steps to create and support new groups which can focus on specific proposals.**
- 2.4.5 Training is vital and should also include training for members of disability groups and measures to build up their capacity to be involved. **We look forward to Scottish Government initiatives on this.**

## The Design Process

- 3.7.5 Disabled people should be involved in undertaking quality audits, especially audits of visual quality (eg lighting), access and walking. **Additional details on requirements for these would have been helpful as well as indication as to who should take a lead in carrying them through.**
- We note that Transport Scotland has been conducting an audit of trunk roads and is shortly to produce a 'Good Design Guide'. Disabled people have been involved in this through the 'Roads for All Forum'. Guidance on trunk roads should not of course be seen in isolation to other guidance on roads and streets.**
- 3.11.2 'A reduction in clutter within the street' is mentioned. This is vital, particularly for sight-impaired people, and **once more is a matter for authorities responsible for existing streets and new ones once completed.**

## Layout and connectivity

- G1.2.4 We have reservations about pedestrians and cyclists being accommodated on streets rather than on routes segregated from motor traffic. We understand the need for a sense of security. But much depends on how they are 'accommodated' - ie if they are segregated on the street with pavements for pedestrians and cycle lanes for cyclist. **Table G1.1 suggests 'shared-use routes for pedestrians and cyclists'. We are strongly against this, especially the hazards for less mobile pedestrians and those with hearing and sight impairments.**
- G1.3 We are all in favour of safe and inclusive communities 'offering equality of opportunity and good services' which meet 'the diverse needs of existing and future residents'. **High on the list of priorities for these services is accessible and affordable housing and transport for disabled people. These must be**

**included at the design stage in any new development and included in any redevelopment.**

G1.4 *Inclusive Mobility*, the DfT's *Guide to Best Practice on Access to Pedestrian and Transport Infrastructure*, gives research-based advice on walking distances for wheelchair users and people with visual and mobility impairments (Page 24). It says that research in London showed that 'of all people with a disability who were able to walk at all, approximately 30% could manage no more than 50 metres without stopping or severe discomfort and a further 20% could only manage between 50 and 200 metres'. This is way below the 800 metres suggested here as 'comfortable' for a 'walkable neighbourhood'. **Disabled people can make up 10% of the population so this should be clearly recognised in this Section. Also see our comments under Section G3.5 below.**

G1.4.2 & 3 We support the points made here about housing density and the importance of linkages to local facilities by walking routes and public transport, especially regular bus services at frequent intervals.

### **Quality Places**

G2.7.2 We fully agree that 'high quality open space is a key component of successful neighbourhoods' and 'as with streets, parks and other open spaces should be accessible and be well overlooked'. Such routes and services should be specially designed to cater for the needs of disabled and elderly people. Accessibility does not just mean easy to get to (although that is vital) but easy to use and enjoy by everyone, including disabled people of all ages, **The OPENSspace Research Centre at Edinburgh College of Art has done a lot of relevant research in this area which should be referenced.**

Figure G2.8 We agree that these things can add to the local amenity (seats for the elderly and infirm are especially important) but they can also clutter up the area if not well positioned. Careful design should include some tactile or visual protection to prevent them being hazards for visually impaired people.

G2.9.2 Disabled drivers need to be able to park their cars close to their place of residence and allowance for this must therefore be made. **Likewise, door-to-door transport services must have easy access.**

G2.10.1 & 2 We welcome the statement that 'clutter is visually intrusive and has adverse implications for many disabled people'. Unfortunately agencies responsible for managing streets do not regularly exercise their powers to prevent or control such things as A frame signs, chairs at cafes, wheelie bins. These can form obstacles for many disabled people particularly those with sight impairments. **Street furniture and signs should follow guidelines for positioning, colour contrast, etc.**

### **Street users' needs**

G3.1.1 - 5 We very much welcome the statement that 'street design should be inclusive' and the reminder to public authorities that they have a General Duty to promote equality under the Disability Discrimination Act 2005 and to consult and involve disabled people.

In G3.1.2 the phrase 'Poor design can exacerbate the problems of disabled people - good design can minimise them' should be changed to read '.....for disabled people...'.  
  
The other statements and references in these sections are also important. **But it**

**should also be noted that under the DDA public authorities have a Special Duty to prepare and publish a Disability Equality Scheme. The former Disability Rights Commission issued a *Statutory Code of Practice* to which reference should be made.**

- G3.3.1-4 We welcome these sections and the reminder that 'for the purposes of this manual (NB), pedestrians include wheelchair users...'. The statement that 'a street design which accommodates the needs of children and disabled people is likely to suit most, if not all, user types' overlooks some of the conflicts of need that undoubtedly exist and will have to be resolved, including those within the disabled community eg flat surfaces/tactile surfaces, steps/ramps, etc.
- G3.3.7 It is stated that 'level changes and increased distances involved are inconvenient, and they can be difficult for disabled people to use'. We agree and, as noted in *Inclusive Mobility* mentioned under G1.4 above, walking distances are affected by gradients and the need to rest increases walking times.
- G3.3.9-32 We welcome the various references made in these sections to the needs of blind and partially sighted people for signalised crossings, dropped kerbs, tactile surfacing, and good lighting and to potential hazards such as poor drainage and overhanging trees. We are in favour of Puffin crossings especially with the arrival of noiseless vehicles which will pose an additional problem for blind and partially sighted people.
- G3.4.8 The fear of being struck by cyclists is a significant concern for many older people as well as for disabled people.
- G3.5.1-4 The concentration in these sections is on 'bus-based public transport as the most likely mode to be used for serving residential areas'. But attention should also be drawn to demand-responsive transport services (including taxis, private hire cars and community transport minibuses) which require access through streets to people's homes. These can be vital mainstream services especially when bus services are inadequate or inaccessible. **Both designers and public transport operators should consider the implications of this as elements in the 'walkable neighbourhood'.**
- G3.5.5 The effect of traffic-calming measures on disabled bus passengers can be serious, especially the effect of speed bumps for people with sensitive conditions such as arthritis. This will deter them from travelling.
- G3.5.10 We certainly agree that 'routes to bus stops must be accessible by disabled people'. They must be hazard-free and well lit. *Inclusive Mobility*, to which reference is made, says that in residential areas 'bus stops should be located ideally so that nobody in the neighbourhood is required to walk more than 400 metres from their home' and 'research shows that for disabled people, bus use falls off sharply if the distance is more than 200 metres (250 metres for able-bodied people)'. Contrast this with the statement in G1.4 that up to 800 metres is a comfortable walking distance. **We think existing bus stops should comply with the DfT guidance as well as new ones.** Clearly this has implications for bus services, and transport managers should consider how to provide these at sufficient frequency and along routes which will serve local amenities such as shopping centers, leisure centres, hospitals and schools.
- G3.5.12 The quality of bus stops is most important, especially the provision of shelter, seating, clear signage and timetable information. *Inclusive Mobility* has guidance on these matters. **A major problem in towns is car and van parking at bus**

**stops which prevents buses from drawing up the kerb and thus making boarding more difficult or impossible. Local authorities should do more to monitor this and penalise offenders.** *Inclusive Mobility* gives guidance on the use of full-width and half-width boarders as a solution to this problem and **we would encourage this, especially full-width boarders where possible.**

- G4.2.17 As stated. shared surfaces within Home Zones, as elsewhere, certainly do create difficulties for disabled people, especially blind and partially-sighted people, and **we are pleased to see reference made to DPTAC's guidance *Design for Disabled People in Home Zones*.** Blind and partially sighted people need markers such as kerb lines by which to navigate. There needs to be 'eye' contact between drivers and pedestrians for schemes to work. And any person installing such schemes may be open to legal challenge if the service offered to a disabled person is of a lesser standard.
- G5.1.3 The phrase 'the disabled and mobility impaired' should be changed to **'disabled and mobility impaired people'**.
- G5.3.24-27 We strongly support the need to provide clearly marked spaces for Blue Badge holders located as close as possible to their places of residence, shops and public amenities. We further note the recommendation that '5% of residential car-parking spaces are designated for use by disabled people' but that a **higher proportion may be necessary on the basis of demand.**
- G5.3.42 **We are strongly against footway parking as it is a hazard and inconvenience to pedestrians, especially for blind and partially-sighted people.** Local authorities should prohibit it by regulation and have it enforced. But we note that suggested physical deterrents such as bollards, raised plant beds and other street furniture can also present hazards unless given colour contrasting and other protective measures (cf Figure G3.2).
- G5.3.56 We agree with the correction to diagrams in *Inclusive Mobility* showing the marking of parking bays for Blue Badge holders. The inclusion of other references on this matter is welcome.
- G8.2.1-8 **We very much agree that excessive street furniture should be avoided, as noted above.** Equipment left by utility companies often presents hazards and protective barriers themselves become barriers, especially when badly positioned or displaced by wind. Surfaces are often not properly restored and remain uneven for walkers and wheelchair users.
- We agree that seating is most important, although again it must be regularly maintained. Guard railing can be a vital indicator of hazards for blind and partially sighted people.
- G8.3.1-35 **Good quality, well-placed street lighting is essential** for disabled and elderly people, especially those with limited vision, not just for safety but for regular navigation. Lighting columns certainly need to be placed where they do not obstruct movement or provide a hazard. Attachment to buildings should certainly be considered to reduce street clutter.

## **Conclusion**

We conclude by repeating that, whilst welcoming this document as highlighting the need for good design for **new streets**, we consider that the overwhelming need is to improve **existing streets**, especially walkways. We hope this document will be considered by the authorities as a 'manual' to do that. However we are not satisfied that the necessary resources are being made available

due to cutbacks in council expenditure. Spending on pavements can exceed that on carriageways, so a large proportion of cuts take place there. Consequently the convenience of pedestrians and the safety of the most vulnerable people is put at risk. Inspection is also be reduced, current practice often being to drive by in a car rather than inspect on foot. So many faults go unnoticed. Although *Designing Streets* covers testing and auditing, the need for subsequent inspection is not addressed.

**Submitted after consultation with members by Alan Rees MBE,  
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