Dear Patrick,

**Response to the Consultation on Priority Seat Design**

Please find below MACS’ comments on the priority seating design on the new Hitachi trains (Class 385).

Firstly, we agreed that it is a good idea to have something eye catching but we are not convinced this is the solution for the following reasons:

- The dark colour is not good for visually impaired.
- The pattern, although eye catching looks very juvenile and does not appear to represent all disabilities, (which would be an impossibility) including those with sight loss, those requiring additional seating space, etc.

We suggest the following:

- The cover needs to show that the seat is different from others on the train.
- It should include a bright colour with a contrasting band down the middle.
- It should incorporate a bright colour with ‘Priority Seating’ written at the top in large enough font to be visible from a distance. There should also be clear contrast between the lettering and the background, e.g. white/yellow on black (which often works better for those with sight loss).
- We suggest a Triangle on the seat itself to distinguish it further.
- The cover should incorporate tactile surfaces to make the seat independently identifiable by those with sight loss.
- The prioritised status of the seat should be further backed up by other notices on the windows, readable from both inside and outside the train. Outside identification would make it easier for passengers to identify from which end of the carriage they should enter the train.
- Discussions on the prioritised nature of the seat give rise to other questions of wider question of other passenger courtesy.
- There is also a wider question of the generic nature of the chair.
Additional concerns were raised as to whether prominent identification of seats as 'Priority Seats' would negatively 'brand' passengers seated on them as compared to fellow passengers occupying 'regular' seating. A further concern was expressed as to what statistical evidence and criteria was used to determine which passengers qualify as entitled to a 'Priority Seat', and whether there is a risk that only a small proportion of those that actually require this facility would be able to utilise it.

Also questions were asked as to what proportion of seats in each carriage would be designated as 'Priority Seats' and where these would be located (presumably close to doors and lavatory facilities).

MACS members also had the following thoughts which have been copied verbatim:

“I agree with what was said about the design being dark and the figures too small. It was a nice attempt at something different but I don't think it is practical. I was wondering if there is a British, European or International standard for priority seating? If not, then something bright and easily recognisable would be best.”

“Why does this seat not simply have the internationally recognised sign for disabled displayed on the actual seat? I would think simple and effective and no need to re-invent the wheel, also recognised by all nationalities.”

“However it should be noted that the international sign can be confusing and misleading. It's also beginning to be on the way out as people tackle the need for visual imagery which does not prioritise wheelchair users over others with need. Also, will that not simply make people wonder why someone who is in a wheelchair needs a train chair? Plus a bit worried that having mum/pregnant lady and disabled and injured will lead us down the same path as the buses and buggies debate.”

“It isn't overly clear to me what this is meant to be telling people. Is it for disabled people to identify the seat? Or is it for others to recognise that this is a priority seat and not sit there? I think the design as it stands runs the risk of not providing a clear message for either group.”

“Whilst I did quite like the design as a design I don't think it is practical or reflects the whole sphere of those who require a priority seat.”

“I like that they have use diversity and make it fun a quirky but I am just not sure it would work as it is. How would disabled tourists view it and would they instantly recognise it, would anyone?”

“What is the message it is trying to portray, the images are too small to mean anything and for someone with a visual impairment may not be recognised as a design that means anything.”

“On specifics for the design – I am not sure for sight impaired this seat will show up as anything different to any other dark coloured/blue seat. You’d need quite a lot of sight to distinguish the detail of wee images. Something additional would be required and trialled with sight impaired people. Re the tonal contrast – no comment can be made as tonal contrast is achieved with an item against its surrounding and in various lighting conditions. Of the top of my head and others with more technical knowledge than me would be able to clarify but think it is around 50% light reflective value with the surroundings.”
The above comments are intended as constructive critique of the proposals submitted, however it should be noted that it is difficult to form concrete opinions from a photograph. It is hoped that further consultation opportunities using a physical mock-up or representation of the intended product will be offered in the near future.

MACS would be happy to engage in such consultations.

Yours sincerely,

Mobility and Access Committee for Scotland
August 2016