

## **Mobility and Access Committee for Scotland (MACS)**

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Accessibility and Equalities Team  
Department for Transport  
via email

Your ref:

Our ref:

Date:  
11 Nov 2015

Dear Sir or Madam,

### **CONSULTATION ON INTERIM CHANGES TO TACTILE PAVING SURFACES GUIDANCE**

1. The Mobility and Access Committee for Scotland welcomes the opportunity to comment on the above public consultation. As you are aware, MACS is the statutory adviser to Scottish Ministers on transport matters as they relate to the interests of disabled people. Our comments in response to the specific questions posed in the consultation document follow some general comments we hope you find useful.

#### **General comments**

2. These proposed Interim Changes are a positive step towards the full review of the Tactile Paving Guidance that Department of Transport is committed to undertake. We are however keen to know when this more comprehensive review will start and what the final timescales will be, given that you think the research phase will take 12 months.

3. The consultation says the full review includes a research phase to test alternative tactile layouts and surfaces that work for sight impaired people, whilst being safe and comfortable for people with mobility impairments. We support this and suggest that it goes beyond people with mobility impairments but includes other disabled people and equality groups, for example older people.

4. The consultation explained that these Interim Changes were discussed with disabled people as an agenda slot during an event. Further consultation of these proposed Interim Changes with more disabled people and other equality groups was not to be held. We are slightly concerned about this as question 3 relates to what could be substantive changes in streetscapes, for example, large areas of tactile paving on shared surfaces. We would advise that more consideration be given to researching more fully the implications of questions 3 topics. Within the interim and full review any negative unintended consequences to other disabled people and equality groups should be avoided.

5. It is not clear within the proposals if these interim changes will also be the final ones for the full review of the Guidance. We are going on the assumption that during the review, all types and design of tactile paving is to be looked at including potentially reviewing these interim changes.

### **Question 1: Relaxation of the requirement for the back edge of an area of blister paving to be perpendicular to the crossing direction**

6. The consultation offers two options of this alternative back edge design for uncontrolled crossings – straight or a curve edge. Both of these options offer benefits and potential downsides. For example, the curve in practice might not be installed appropriately as it involves cut-offs. The stepped profile provides a straight edge and thus potentially more of a line up to make a straight crossing. However, on the diagram it looks a more hectic design.
7. Either of these options could do. However, with the potential for less than effective installation to make a curve, the stepped approach might deliver more consistency in installation.

### **Question 2: Replacement of the requirement for blister paving at a controlled crossing to be red with a requirement for at least a 50% contrast ratio with a surrounding paving**

8. Specifying red blister tactile to denote a controlled crossing area served the Guidance at its inception. We know over time that this emphasis on 'colour contrast' instead of 'tonal contrast' has not in effect served people with low vision as well as it was aimed to. Through the years there are increasingly different paving finishes that now do not provide a good tonal contrast when using red tactile.
9. We are also aware that some areas decide not to use the red paving as it is deemed not aesthetically complementary to certain surroundings, for example, in heritage areas.
10. We welcome the move to insist on a minimum 50% tonal contrast to the surroundings. This should now enable all street designers to incorporate appropriate tones of tactile paving in all areas. The 50% tonal contrast is to be achieved in different weather situations, for example, wet or full sun.
11. The minimum of 50% is a minimum not a target and in any guidance documentation that is produced we feel this point should be made, that there is nothing stopping designers installing a higher tonal contrast.

### **Question 3: Introduce a universal requirement for the boundary between carriageway and footway to be demarcated with tactile paving wherever they are the same level**

12. This should be an easy question to respond to as it is about establishing a principle that where a 60mm kerb is not installed then there has to be 800mm deep installation of tactile paving.
13. As the consultation document outlines previous research found 60mm deep kerbs is identifiable by sight impaired people, and 800 mm depth tactile surface also identifiable. We would remind again that these are minimums not targets and to increase changes of identification, and thus safety, there is nothing to hinder designers installs deeper kerbs.
14. The consultation document states that this recommendation to install 800mm depth tactile surface where the carriageway and footway are level, for example, at junctions, at extended speed tables, at side roads, or an extended level surface area. This therefore could mean that there could be tactile surfaces over quite substantial areas, and this has not been tested and trailed with sight impaired people and disabled people and other equality groups.
15. The principle is therefore easy to agree with, but there are significant implications in the application and research would be required to establish this change and to do it well. We note

that the illustrations used are not an extended level surface, but a traffic table and a four-way junction. As an example of how more thought and research is required we will focus on the four-way junction. This diagram shows that 800mm depth of tactile surface encompassing a road, continuing round a corner, and to another road. Sight impaired people who rely on tactile to help them line up and cross straight over a road would find this layout hinder them as there is no definition between crossing areas and the corner. A blind person could line up on a corner and walk diagonally into the middle of the 4-way junction. It is not insurmountable that designers works with local communities to find a solution to this, for example by having traditional and recognisable crossing area tactile paving and a totally different texture surface for the corner which provides a clear message of “no-go”.

16. We are not offering these up as definitive solutions but as a means of demonstrating that more work and research is required in this area.

#### **Question 4: Suggestions for crossing improvements**

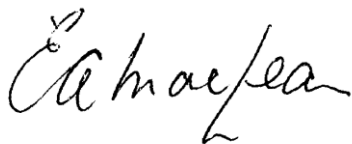
Do you agree that where signal controlled crossing have two push button boxes they should both have tactile rotating cones?

17. Yes, we agree with this.

Do you agree that push button boxes at signal-controlled crossings should have tactile arrows indicating the crossing direction?

18. Yes, we agree with this as the tactile arrow has been seen to work aboard, and it would help people line up to make a straight crossing. We request a little bit of thought into the location of the tactile arrow. It is shown in the consultation document to be on the top of the box. We are aware of suggestions from sight impaired people that it could be used more effectively and efficiently if it were located near the push button area.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anne Maclean'.

**ANNE MACLEAN OBE**  
Convener