

Mobility and Access Committee for Scotland (MACS)

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Scottish Government Planning and Architecture Division
Via email

Your ref:

Our ref:

Date:
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Dear Sir or Madam,

PLACE STANDARD

Thank you for the opportunity to comment on the Place Standard Tool, beyond the closure of the formal consultation.

The development of this practical and helpful tool is welcomed by the Mobility and Access Committee for Scotland. MACS is impressed with the simplicity of use and the resulting pictorial illustration means it will serve well as a community engagement tool for analysis and rating. It provides a shared platform for joint discussion and analysis by professionals and those in the community of place which is the right and proper starting point for changing things and improving outcomes. We feel that this could also be used as measuring tool to measure improvement in outcomes following an intervention or on a rolling (e.g. annual) basis.

We recognise that the spreadsheet needs to be kept to a reasonable scale and that the breadth of information in it should not be overwhelming, and it achieves this. Further, we recognise that it is an illustrative tool which utilises people's perceptions, as opposed to hard data, and that it will be followed up with deeper analysis and action planning, involving professionals.

We feel that the tool offers opportunity to support disabled people's mobility and access needs, which contribute to their enjoyment of their human rights including their rights to full and active citizenship and participation, are given equal and well-thought-out consideration, whilst also recognising that the tool is not a technical document or able to focus specifically on disabled people's needs.

However, we make the following remarks and recommendations for change which we hope will refine the outcomes for disabled people further down the chain.

Firstly, we **recommend** that the tool highlights the need to involve disabled people in using the tool in their communities. To support this we also **recommend** that those administering it could benefit from, if not already undertaken or refreshed, disability awareness training including inclusive communication. For example, we note that the excel tool and assessment chart are not themselves accessible to many disabled people and it will be important for community engagement around this tool to provide access to it in alternative formats, on time and in the right ways.

We also **recommend** that consideration is given to adjusting the way in which disability is represented in the Talking Points sections. For example, only wheelchair users and visually impaired people are highlighted in the Moving Around section. This means that people are, perhaps inadvertently, encouraged to follow a well-worn path of only taking account of visible disabilities or those that they are most conscious of. A reference to 'disabled people with a range of mobility, sensory and cognitive impairments and those with long-term conditions' would help to ensure that users of the tool consider the issues for all disabled people in their discussions.

Elsewhere (Facilities and Amenities) the Talking Points section refers to 'Accessibility for people with different needs'. This generic term is reasonable and understandable as an inclusive term to cover a range of different groups in the community, but in terms of providing a robust analysis on which to build future priorities and actions a lot relies on the people using the tool to identify the needs including the diverse, multiple, interconnected and sometimes complex needs of disabled people. It is crucial that this complexity is recognised and is not brushed aside as 'something we know we don't know, or don't know we don't know'. It is also important that, somewhere in this chain, people with the appropriate professional specialist qualifications and expertise and those with lived experience of the barriers are actively involved. This spreadsheet may or may not be the place to do this, but it is an important point and we **recommend** that Scottish Government assess how to promote this need.

Accessibility is mentioned in the Public Transport section, but pertains to the location rather than the design and usability of bus stops etc. Specifically, the bus stops should ensure that the transport mode itself is accessible, otherwise the latter is invalidated as a travel option for some disabled people. We **recommend** that the link between the physical environment and the transport modes is made clearer.

There is, for many good reasons, a presumption that walking, cycling or using public transport should take priority. However, users of the tool need to ensure that they take account of the driving and parking requirements of disabled people for whom walking, cycling or public transport are not viable options. We **recommend** that the tool is adjusted to ensure that users of the tool take account of this.

We also **recommend** that Talking Points for Natural Spaces and Play and Recreation should highlight the need for barrier free approachability to and from these spaces and circulation within these spaces, for disabled people.

The inclusion of 'Impact of Vehicles' is welcomed. Heavy traffic coupled with insufficient and inappropriate parking provision and practise can have a hugely negative impact for many disabled people in terms of their freedom to move around. However, this section would benefit from highlighting the need for Blue Badge use and car-parking to meet the needs of the community – in its current form it promotes other forms of mobility which may simply not be possible for some disabled people. We **recommend** that this issues is introduced in the Talking Points section.

Finally, an alternative to changing the individual Talking Points lists may be to remove the references to specific groups and to including over-arching point (and more detailed, as it would only need to appear once) statement about considering the needs of all groups in the community. It could also provide an opportunity for signposting people to sources of information or national umbrella organisations who would put communities in touch with local groups representing specific groups in the community, such as disabled people.

Yours sincerely,

ANNE MACLEAN OBE
Convener