



Comments from Imtac on the consultation on Interim
Changes to the Guidance on the use of Tactile Paving
Surfaces

November 2015

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About Imtac

Imtac is a committee of disabled people and older people as well as including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Regional Development (DRD).

General Comments

Imtac welcomes the opportunity to comment on the the proposed interim changes to the guidance on the use of tactile paving. As a committee of disabled people Imtac recognises that whilst for some disabled people tactile surfaces are absolutely essential for other disabled people the surfaces can present significant challenges. The Committee welcomes any proposals which simplify guidance, minimising the use of tactile surfaces whilst ensuring they work better for people with a visual impairment.

Comments on the interim changes

“Relaxation of the requirement for the back edge of an area of blister paving to be perpendicular to the crossing direction with two options”

(1)Fixed depth, following the kerb line and (2) approximation of a fixed depth, with a stepped profile

Imtac notes that in many cases it is preferable to indent uncontrolled crossings a short distance from corners at junctions. However we do recognise that it has become common practice for such crossings to be located on the curve of junctions. This creates significant issues in the laying of tactile paving. As the consultation points out, on some occasions, significant amounts of additional tactile paving are laid to

meet the minimum depth requirements set out in existing guidance. It is much more common, in our experience, that at such crossings the required depth of tactile paving is only provided on one side meaning that the paving on the other side is of insufficient depth. Where this happens it is not inconceivable that someone could step over the tactile surface completely and go straight from the footway onto the carriageway.

Both suggested changes to the guidance are sensible ways of addressing this issue, reducing the need for additional tactile paving whilst making these crossings easier to use by people with a visual impairment. However Imtac does have some practical concerns about the first option. We believe local authorities will be reluctant to use this guidance as it involves cutting and shaping tactile pavers which will be more time consuming and inevitably lead to some wastage. From the users perspective Imtac has concerns about maintenance issues. All tactile surfaces are subject to some degradation over time and maintenance, in our experience, is generally a low priority. The Committee is concerned that the need to cut and shape tactile paving for specific crossings will make it more difficult to get local authorities to carry out required maintenance than is currently the case. For these reasons Imtac would prefer that option 2 is used, as the laying and maintenance of the tactile surface is more straightforward.

“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 the surrounding paving”

Imtac has undertaken substantial work around the accessibility of the pedestrian environment over the past decade. As part of this work the Committee has looked at the growing numbers of public realm improvement schemes that have taken place in our towns and cities. It has become clear to our members that due to use of different materials including natural stone in these schemes that the current requirement for specific colours for tactile paving at crossings is increasingly impractical as the tactile paving often does not contrast with the surrounding pavement. We support the proposal in the consultation to replace the requirement for paving to be red at controlled crossings to be red with a

requirement for at least a 50% contrast ratio with the surrounding paving with a number of additional caveats.

Firstly the consultation indicates that this change will apply to tactile paving at controlled crossings. It is also essential that tactile paving at uncontrolled crossings contrasts with surrounding paving. Imtac would therefore seek clarification as to whether the proposed change to guidance will also apply to uncontrolled crossings. Secondly, in our experience, too often designers use current exemptions allowed for conservation zones to provide tactile paving that provides no contrast with surrounding pavements. If the changes are brought in it is the recommendation of this committee that the new guidance also apply in conservation zones where current practice often does not provide sufficient or any contrast.

“Introduce a universal requirement for the boundary between carriageway and footway to be demarcated with tactile paving wherever they are at the same level”

Raised junctions, road humps and crossings are increasingly being used to reduce the impact of vehicular traffic on our streets. There are clear benefits to such schemes for pedestrians but raising the road surface to level of the footway without some tactile indication of the surface presents a potential hazard for people with a visual impairment. Through our work we have come across a number of examples in public realm improvement schemes where raised pedestrian crossings do not extend tactile paving the entire length of the crossing. Given this Imtac is broadly supportive of the proposed changes to the guidance with some caveats.

Firstly the nature of the tactile surface must reflect the nature of the surrounding environment. For example many raised road humps do allow crossing opportunities for pedestrians. In such circumstances standard blister paving should be provided along the whole length of the raised surface. Other raised humps may not provide access for pedestrians, for example if a raised hump extends across the carriageway from a footway but there is no footway on the far side it is not appropriate to blister tactile paving indicating a crossing opportunity.

In this case it is more appropriate to provide hazard warning tactile surfaces.

Secondly the consultation uses the examples of raised junctions. Figure 3.1 indicates that at such junctions blister tactile could be provided around all the level surfaces of the junction. For Imtac such an approach would create significant difficulties for someone with a visual impairment. Universal provision of blister paving at these junctions will make it impossible for people with a visual impairment to cross safely, people could easily find themselves disorientated in the middle of the carriageway. The Committee recommends that raised crossings include standard designed uncontrolled crossings with blister paving located where it is safe to cross from one footway to the other, in other areas of the raised crossings a tactile hazard surface should be included to warn people with a visual impairment that they may be stepping out on to the carriageway.

Suggestion for crossing improvements

(1) Push-button boxes at both sides of controlled crossings to have tactile rotating cones and (2) Push-button boxes at controlled crossings to carry tactile arrows indicating the direction of the crossings

Both proposals are sensible improvements that will make using controlled crossings easier for people with a visual impairment and Imtac supports the proposed changes to the existing guidance.

Other comments

Whilst Imtac welcomes the majority of the proposed changes to the current guidance, we believe significant work will be required to ensure that designers, transport professionals and contractors are made aware of the changes. More importantly it is very important that steps are taken to ensure that people who use tactile paving are made aware of changes to provision, preferably prior to their introduction.