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**Sight Scotland and Sight Scotland Veterans**

Call for views: Consultation on Guidance on Inclusive Design for Town Centres and Busy Streets

March 2024

**About Sight Scotland and Sight Scotland Veterans**

At Sight Scotland we’re tackling vision loss together. Our mission is to reach everyone in Scotland with sight loss – where and when they need us.

We are here for everyone affected by vision loss in Scotland. We offer support and advice, campaign for equal rights and fund medical research. We provide learning, care, accessible formats and support blind and partially sighted people in their communities.

Our sister charity Sight Scotland Veterans supports veterans with vision loss, assisting them and their families to adapt to the impact of visual impairment. We enable veterans to regain confidence, restore independence and make new connections.

We provide services that offer support to connect with information, services, and local support, guidance on how to be as independent and safe as possible at home and in the local community, advice on living well, understanding more about sight loss and how to deal with the emotional and practical difficulties which might be faced.

Together, our charities are determined that no one should face sight loss alone.

To get free support you can call Sight Scotland on 0800 024 8973, for Sight Scotland Veterans call 0800 035 6409. You can also get in touch by emailing us at [hello@sightscotland.org.uk](mailto:help@sightscotland.org.uk), or by visiting our website Sightscotland.org.uk.

**Sight Scotland and Sight Scotland Veterans response to consultation on Guidance on Inclusive Design for Town Centres and Busy Streets**

# **Question 1**

**Please give us any comments relating to Principle 1 and what it is trying to achieve (300 word limit).**

Engagement with people with visual impairment and other disabilities is essential to ensure inclusivity is embedded in the design of our town centres and streets. We acknowledge the aim of Principle 1 to ensure everyone is involved in the engagement process. At Sight Scotland and Sight Scotland Veterans, we believe inclusive design is essential to ensure people with visual impairment can navigate their town centres and streets independently, comfortably, and confidently. Including communities in the process from the beginning means that the design outcome will be more likely to meet the needs of the biggest number of people. From the perspective of street designers, it also means that designs are more likely to be reflective of users' needs in the first round of design and there is less chance of having to alter designs, which can incur extra costs and use of materials. Additionally, understanding examples of best practices and repeating these in different designs across Scotland means that consistency in street design is more likely to be seen – something that makes the lives of people with visual impairment much easier. The social model of disability says that people are disabled by barriers in society and not by their impairment or difference. This model is reflective of an approach that ensures street design is about enabling people, not disabling them. Ensuring street design suits the needs of people with visual impairment enables them and makes their lives easier.

# **Question 2**

**Please give us any comments relating to Principle 2 and what it is trying to achieve (300 word limit).**

As noted in the consultation paper, early and ongoing engagement is essential. We support the suggestion that engagement needs to be from the concept stage, continue through construction and completion, and go beyond a project evaluation. In-person site visits and the use of 3D tactile models are useful to ensure people with little or no vision can understand a space when they cannot see it. Consistent check-ins throughout the design and consultation process are important. The consultation paper highlights that exploring how people currently use a space and/or would like to use a space, is important. We agree with this and believe it would add to the experiences that people with accessibility requirements have if an area could be made more accessible.

# **Question 3**

**Please give us any comments relating to Principle 3 and what it is trying to achieve (300 word limit).**

We champion and advocate for accessible communications across our organisations. Therefore, we agree that all engagement materials and language used need to be accessible to the audience. The consultation paper highlights the use of tactile plans, and how these can aid blind and partially sighted people with their understanding of street design plans. We note that materials need to be made available in braille and large print too. In addition, venues for engagement meetings must be accessible; if videos are used, they must include audio descriptions. Furthermore, PowerPoint slides with designs should only be used when necessary, and used in conjunction with image descriptions, strong explanations, and tactile models.

# **Question 4**

**Please give us any comments relating to Principle 4 and what it is trying to achieve (300 word limit).**

We agree that the individuals, local communities, and groups who use a place know it best, and that even those who may experience a place for a brief period should be considered in street design engagement. We understand that principle 4 aims to make engagement as inclusive as possible and that this is very important. We would be pleased to help with this and to facilitate engagement with blind and partially sighted people across Scotland to ensure their experiences and needs are considered. We would welcome early notification of the ability to contribute so that we can facilitate this engagement as effectively as possible.

A note to add that the detailed exploration of engagement in the consultation paper is welcomed. However, to be effective, findings from this need to be put into practice, measured, and learned from so that best practices can be replicated across Scotland when consulting on the design of streets and town centres in the future.

# **Question 5**

**Please give us any comments relating to Principle 5 and what it is trying to achieve (300 word limit).**

We agree that for engagement to be successful for people with visual impairment and other disabilities, it needs to be located at convenient locations for all to attend. Flexible approaches e.g. virtual engagement sessions are a positive method of opening the consultation to members who otherwise may not be able to attend, but it must also be remembered that virtual sessions do not work for all and that some people with visual impairment need support to access online meetings. It is useful to consider – particularly for people with visual impairment – how hosting daytime sessions during Autumn or Winter when it becomes dark earlier is important, as well as hosting sessions at venues with good transport links for those who rely on it. Spaces inside for engagement sessions also need to have space for guide dogs, and it is useful when staff who are sighted-guide trained. We would also advise that it is worth approaching people before engagement sessions to enquire about their accessibility requirements and what they need to contribute effectively.

# **Question 6**

**Please give us any comments relating to Principle 6 and what it is trying to achieve (300 word limit).**

We support the suggestion within Principle 6 of the consultation paper that there needs to be a “place and person-led approach”. This principle deals with effective separation between different user zones, which is a recurring issue we discuss as experienced by blind and partially sighted street users. Effective separation is essential. As highlighted in the paper, kerbs that are at least 60mm in height are very important, particularly when there are continuous footways. Kerbs are essential for guide dog owners and long cane users to be able to differentiate between a footway and a road. As highlighted in the consultation paper, “level surface” streets with only tactile paving and without kerbs are particularly dangerous for people with visual impairment. The paper notes that “level surface” streets should only be used following consultation with local communities, including visually impaired people, and in areas of low traffic speeds and volumes. We find these designs dangerous and concerning regardless of the volume of speed and traffic due to their inability to highlight where roads begin for visually impaired people. We welcome that the consultation paper acknowledges this and notes that additional accessibility measures would be required. We would suggest avoiding such designs as much as possible.

# **Question 7**

**Please give us any comments relating to Principle 7 and what it is trying to achieve (300 word limit).**

As a sight loss charity committed to championing accessibility and the rights of visually impaired people, clear unobstructed streets are essential to ensure safe passage for pedestrians. People with visual impairment are more likely to be injured from encountering street clutter, street furniture, and pavement parking, making this even more important. We support the suggestion that busy crossing points need wider pedestrian corridors, but they also need other features such as tactile paving, audible signals where possible, and rotating cones in crossing boxes. Simplifying signage is an important point for us, as noted in the consultation paper. From a visual impairment perspective, contrasting colours and clear large print are helpful on signage. Tactile paving, as noted, is very useful, but this needs to be consistent and implemented properly to be effective. The consultation paper refers to outdoor furniture needing continuous consistent screening or a low tapping rail to aid long cane users. Outdoor seating areas from cafes, restaurants, and bars are another barrier that blind and partially sighted people face and should be avoided where possible. If this is not feasible, continuous screening and low-tapping rails should be used to make the pavement easier to navigate.

# **Question 8**

**Please give us any comments relating to Principle 8 and what it is trying to achieve (300 word limit).**

Signal-controlled crossings are our preference, as uncontrolled crossings have no way of indicating to people with visual impairment when it is safe to cross. We welcome that the consultation paper notes the need for accessibility features to be used correctly. We also welcome that the guidance acknowledges the importance of engaging with local communities. However, to be effective, feedback from such engagement must be put into practice and implemented into plans from the beginning of the process. We understand that all crossings will have to meet the requirements of legislation and guidance, including the Traffic Signs Regulations and General Directions 2016 (TSRGD), and that this includes the correct use of accessibility features. This is also welcomed, but we question how this will be enforced. Implementation is essential here, as well as building on positive examples of best practice that can be mirrored in other street designs. Finally, we support the suggestion of listening to developments in technology – developments such as Navi Lens have been revolutionary for blind and partially sighted people. However, technology must be used in conjunction with other accessible features such as braille signage and tactile markings.

# **Question 9**

**Please give us any comments relating to Principle 9 and what it is trying to achieve (300 word limit).**

Colour contrast is a really important feature in town centre and street design that makes a huge difference to visually impaired people with different levels of visual acuity. As noted in the consultation paper, exploring materials in various weather conditions is a key point to ensure tiles and street paving are as accessible as possible for blind and partially sighted people.

We understand that the paper highlights regular maintenance and planned maintenance to improve accessibility. It’s important to have regular maintenance, especially for broken slabs and weather-related damage such as fallen trees and leaves that could lead to unsafe streets. However, in terms of planned maintenance to improve accessibility, it is best practice to ensure the appropriate colour and tonal contrast in pavements and street features are considered from the beginning.

Due consideration must be made to ensure accessible features such as colour contrast will be put into practice, and how this will be monitored.

# **Question 10**

**Please give us any comments relating to Principle 10 and what it is trying to achieve (300 word limit).**

Consistency in street design is important for providing blind and partially sighted pedestrians with confidence when outside in town centres and busy street areas. Members of Sight Scotland’s and Sight Scotland Veterans’ Policy Groups - made up of people with lived experience of visual impairment - report how different cities and towns having different approaches to street design can be incredibly confusing. Consistency and standardised approaches built on best practice models would be useful to help tackle this. We welcome the consultation paper's suggestion that consistent monitoring and evaluation are important and help with future design processes. Within the finished audits that the consultation describes for evaluation after the completion of projects, is it important to assess whether engagement findings have been put into practice. This would help with future planning and design.

A note to add that the consultation speaks of requirements for accessibility – we would add that the accessibility adjustments made from engagement sessions should go beyond minimum requirements and should meet the full needs of people with visual impairment and other disabilities where possible.

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