



Department for Transport Consultation on Changes to the Guidance on Tactile Paving – November 2015

Living Streets is the UK charity for everyday walking.

We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illnesses and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone.

Our ambition is to get people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking.

Thank you for the opportunity to provide a response to the proposals.

Living Streets welcomes the Department for Transport continued interest to provide guidance on the use of tactile paving, intended to aid people who are blind or partially sighted to locate crossing points in the road, whether at formal crossings or at informal crossings (generally where there is a dropped kerb). It is noted that the original advice is very old (1998 and based on research conducted in the 1980's) and the aim is to ensure tactile paving is used in a consistent way across different areas and in a way that it can be adequately maintained.

At one level the proposed changes are fairly technical and may not have a significant impact on our aims by encouraging more people to walk or making streets better places for walking, but they do have implications for people who have more difficulty in making everyday use of footways.

Living Streets Response

Question 1

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

- Do you agree with this amendment to the tactile paving guidance?
- If you do not agree what are your objections?

No. While it is acknowledged that the current guidance can result in less than perfect situations with some angled crossings, it does provide a consistency that stepped or shaped back edges will not provide. The shaped profiles will be very dependent on

the skill level of installers and quality of finish of the installation to produce features that are aesthetically acceptable, and easily maintained.

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 the surrounding paving:

- Do you agree with this amendment to the tactile paving guidance?
- If you do not agree what are your objections?

No. The status quo seems to be acceptable. The standardization on the colour red for tactile pavement at controlled crossings provides consistency across crossings in various places, especially as there are many crossings where this feature is already in place. It is noted that the guidance does not relate to tactile paving in conservation areas or in the vicinity of listed buildings and this provides the flexibility that may be needed for alternatives to blend with design considerations in such circumstances.

Question 3

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

- Do you agree with this amendment to the tactile paving guidance?
- If you do not agree what are your objections?

No.

We do consider that part of the proposal is an improvement – and particularly the de-cluttering related part, removal of *'the remaining raised carriageway either side of the tactile surface should maintain a level difference with the footway of at least 25mm high or have a continuous physical barrier, for example, planters, railings'* and *'it is essential that visually impaired pedestrians are kept away from the radius by the use of continuous physical barriers, for example, guard railings'*.

However, Living Streets is concerned that this proposal moves to guidance on an element of shared space without a full consideration of the issues and potential design solutions that could be applied to each context where shared space is found or proposed. The purpose of Shared Surfaces as defined in the Department for Transport Note 1/11 Shared Space (October 2011) is, *"A street or place designed to improve pedestrian movement and comfort by reducing the dominance of motor vehicles and enabling all users to share the space rather than follow the clearly defined rules implied by more conventional designs."* There are a range of places with degrees of shared space and balances of priority. Where there is delineation of a carriageway and a footway it is Living Streets' contention that driver behavior is to

assume that they have right of way over people walking. Living Streets is concerned about a blanket guidance that all areas of level surface will require a tactile strip to distinguish footways and carriageways. This could lead to considerable lengths of such delineation with impacts on appearance, confusion of function, and maintenance costs.

Question 4

Suggestions for crossing improvements:

- Do you agree that where signal controlled crossings have two push button boxes they should both have tactile rotating cones?
- Do you agree that push button boxes at signal-controlled crossings should have tactile arrows indicating the crossing direction?
- If you do not agree with either of the above what are your objections?

Yes, agreed.

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