**ACCESSING INVERNESS – PUBLIC CONSULTATION**

**PUTTING INVERNESS STREETS AHEAD**

**Response to questionnaire at** [**https://highland-consult.objective.co.uk/portal/dp/accessinginverness/accessinginverness**](https://highland-consult.objective.co.uk/portal/dp/accessinginverness/accessinginverness)

**Question 1 - Academy Street changes**

**To what extent do you agree or disagree that the proposed changes in Academy Street will make this area more attractive to visit, walk and cycle?**

**Response:**

This submission to Highland Council's consultation on 'Accessing Inverness' is made under the name of 'Putting Inverness Streets Ahead'. Co-ordinated by the Royal National Institute of Blind People (RNIB) Scotland, it gives the views of the following organisations:

* Access for All - Inverness Access Panel
* Autism Rights Group Highland
* Deaf Services & Hearing Support Team, NHS Highland
* Guide Dogs Scotland
* Highland Cycle Campaign
* Highland Senior Citizens Network
* Highland Visually Impaired Working Age Group
* Living Streets Inverness
* Ross-shire Access Panel
* Royal National Institute of Blind People (RNIB) Scotland
* Sight Action

We, as a group of concerned organisations want to make our streets more open to everyone, including those with disabilities.

We have been campaigning to persuade Highland Council to adopt a Street Charter based on the [Street Charter Toolkit](https://www.rnib.org.uk/scotland/reports-and-publications-rnib-scotland) published by the Royal National Institute of Blind People (RNIB) Scotland. In 2018 we published [Putting Inverness Streets Ahead](https://www.rnib.org.uk/scotland/reports-and-publications-rnib-scotland) to highlight existing problems of local street clutter including too many bollards, ‘shared spaces’ where roads and pavements are levelled and vehicles and pedestrians use the same space making people feel unsafe, A-boards, unfenced café furniture migrating onto the pavement blocking people’s paths, random street clutter and pavement parking. [See both publications at <https://www.rnib.org.uk/scotland/reports-and-publications-rnib-scotland>.]

We welcome the opportunity to respond as a group to the consultation but must note the inaccessibility of the Highland Council consultation response portal for those who do not have online access and to those visually impaired people who use screen readers. We have submitted a response via the portal as 'Putting Inverness Streets Ahead' to ensure its inclusion among other submissions but have also created a word version of the submission.

Regarding Academy Street, there are potential positive aspects to the proposal such as widening pavements, narrowing crossings, a low speed limit and increased greenery (trees) and we are pleased to see that the design indicates that cyclists will use the carriageway rather than the pavement. However, overall, we do not agree that the proposed changes will make this area more attractive to visit, walk and cycle.

The consultation brochure states:

'Academy Street is one of the most important streets in the city centre. It has potential to become a more attractive street by balancing the needs of pedestrians, cyclists and motor vehicles.'

The project design assumes that a radical revamp of traffic controls and a speed limit of 15/20 mph will create an area that motor vehicle traffic will be reluctant to use giving priority to pedestrians and cyclists. However, Academy Street is an important route within Inverness not least for bus and delivery traffic and access to other areas and we think that the council under-estimates the volume of vehicle traffic likely to continue to use the street. In this context, the absence of controlled crossings may have an undesirable impact on all road users from vehicle traffic and cyclists to pedestrians.

The options suggested for crossings are discussed more fully in our reply to question 2 but the proposed crossing options will cause problems for many people including autistic people, those with reduced mobility and for blind and partially sighted people. There is also no provision for blue badge spaces along the length of Academy Street.

The consultation document 'Accessing Inverness' says that the scheme would 'allow and encourage businesses to engage with the street, creating interest, activity and economic vitality'.

However, it is necessary to consider the space available on the street. According to the plans, Academy Street is mostly 15.5 metres wide with an existing carriageway of 9.5 metres. The plans allocate 6.5 metres to a two-lane carriageway to be used by all vehicle traffic and cycles with a 'flexible space for loading bays, taxis, additional footpath and sustainable urban drainage features'.

On the loading arrangements, Figure 3 refers to ‘flexible space for loading bays, taxis and additional footpath’. This space cannot be safe for pedestrians and for vehicles. Someone with sight loss could be using the space as a pavement and not realise that vehicles may park in the bays. We urge the council not to replicate the problems experienced in Huntly Street on Academy Street.

The plans suggest café life spilling onto the pavements. Pavement activity must take minimum width allowances into account. The Highland Council, [Roads and Transport Guidelines for New Developments](http://www.highland.gov.uk/download/.../id/.../road_guidelines_for_new_developments.pdf) (2013) [<https://www.highland.gov.uk/info/20005/roads_and_pavements/99/roads_information/2>, pp104-5] - states at '5.15.5.1 - Table 5.8 specifies the required minimum widths of footways'. This gives 4.0 metres for local shops and 5.0 metres for major shops.

The [Sustrans Design Manual - Handbook for cycle-friendly design](https://www.sustrans.org.uk/sites/default/files/file_content_type/sustrans_handbook_for_cycle-friendly_design_11_04_14.pdf) (2014) provides typical minimum widths required by pedestrians and wheelchair users. These range from 0.75 metres for a sole pedestrian; 0.9m for a wheelchair user; 1.2 metres for an adult walking hand in hand with a child; and 1.5 metres for either an adult alongside a wheelchair user or an adult alongside a person pushing a pram. [https://www.sustrans.org.uk/sites/default/files/file\_content\_type/sustrans\_handbook\_for\_cycle-friendly\_design\_11\_04\_14.pdf]

[Inclusive Mobility](https://www.idgo.ac.uk/design_guidance/factsheets/width_footways_footpaths.htm) (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably. Where this width is not possible, a clear width of 1500mm should be provided, with an absolute clear minimum width of 1000mm in exceptional cases. The phrase 'clear' refers to the effective width considering permanent obstacles on the footway such as street lamp standards, trees, telegraph poles, bus shelters for example.

[https://www.idgo.ac.uk/design\_guidance/factsheets/width\_footways\_footpaths.htm]

All café, bar, restaurant seating areas should be at the edge of the carriageway as well as any trees, stalls etc. to allow a good clear line of travel for all pedestrians. Any street café furniture should be set out in a consistent pattern, cordoned off and not create obstructions on the footway. Street café furniture can pose problems with long cane users, if canes get trapped under tables or chairs. Street café furniture should have good contrasting features and at the same time not cause glare as can be the case with stainless steel.

**Question 2 - Academy Street crossings**

**Please tell us which crossing option you prefer, and why.**

**Response:**

We strongly prefer controlled signalised crossings to the options proposed under the scheme.

There is extensive research on the relative safety of crossings. The Chartered Institution of Highways and Transportation [Manual for Streets 2](https://cambridge.blob.core.windows.net/public/ldf/coredocs/RD-T/RD-T-040/CD-B-9-12%20PART%202.pdf) (2010) stated: 'Older people and people with a visual impairment may express a preference for signalised crossings as they provide greater certainty when crossing.' [https://www.gov.uk/government/publications/manual-for-streets-2]

In [Roads for all - Good Practice for Roads](https://www.transport.gov.scot/publication/roads-for-all-good-practice-guide-for-roads/) (2013) Transport Scotland stated that it could 'no longer support the use of zebra crossings because they are unsuitable for visually impaired pedestrians'.

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[https://www.transport.gov.scot/publication/roads-for-all-good-practice-guide-for-roads/]](https://www.transport.gov.scot/publication/roads-for-all-good-practice-guide-for-roads/%5D) The Highland Council, [Roads and Transport Guidelines for New Developments](http://www.highland.gov.uk/download/.../id/.../road_guidelines_for_new_developments.pdf) (2013) notes that:

'Signal controlled pedestrian crossings are the safest places for vulnerable pedestrians to cross the road, especially for visually impaired people.' [<https://www.highland.gov.uk/info/20005/roads_and_pavements/99/roads_information/2>extracted from 5.15.3.11].

Guide Dogs’ research [The importance of Controlled Crossings](https://www.guidedogs.org.uk/media/4486/importance-of-controlled-crossings.pdf) (2017)

showed that controlled crossings are found to be the most reliable and least stressful crossings:

'Not only do pedestrian crossings make life easier for people who are blind or partially sighted, but they benefit older people, children and in fact anyone who needs to get from one side of the road to the other. The provision of pedestrian crossings installed in the optimum location with well-laid tactile paving is a key component of a truly inclusive environment and will contribute to the independence, health and wellbeing of all citizens.'

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[https://www.guidedogs.org.uk/media/4486/importance-of-controlled-crossings.pdf]](https://www.guidedogs.org.uk/media/4486/importance-of-controlled-crossings.pdf%5D)

The Autism Rights Group Highland stresses that 'controlled crossings and clearly demarcated pavements and roads are very important to autistic people. Anything that’s not obvious or has ambiguity is a problem … the requirements of visually impaired people and autistic people can be quite similar even though the reasons for those needs may vary'.

Neither of the proposed options for Academy Street include controlled signalised crossings. Option 1 of the scheme (courtesy crossings) states that this option will create a space where vehicles and pedestrians are very aware of each other’s movements. However, this depends on visual interaction between drivers and pedestrians. If someone has sight loss, they will not be able to see whether a vehicle is about to stop. In addition, they may not hear the approach of cyclists or electric cars at a point when traffic is increasingly quiet, also an issue for those with hearing loss. The consultation document describes the zebra crossings (Option 2) as a 'formalised signal crossing, which has paint lines, and amber globe lights … This design can feel safer for those with mobility impairments.' The dependence on visual interactions stands and we refer to the above statements on the preference for controlled signalised crossings.

Both options (courtesy crossings and zebra crossings) appear to have a raised table in the areas approaching the crossings, and the plans and photos imply that the road would be level with the pavement here (that is, shared surfaces). This means that up to two-thirds of the area would not have a kerb. Without a kerb to delineate, people with sight loss could walk onto this raised road section from the pavement without realising that they were on the road.

There seems to be tactile paving at the proposed crossing points, and we would encourage the council to follow the tactile paving guidance to ensure this is consistent.

The area of the road which is not ramped seems to have a kerb, later noted as 60mm which would allow detection by a guide dog or a long cane. Research commissioned by Guide Dogs concluded that 'kerb heights of 60mm and above were detectable when stepping up and stepping down and induced the greatest confidence in what they were and what they signified'. ([Effective Kerb Heights for Blind and Partially Sighted People](https://pureportal.strath.ac.uk/files-asset/67611542/Childs_etal_guidedogs2009_effective_kerb_heights_blind_partially_sighted.pdf%29). Research Commissioned by The Guide Dogs for the Blind Association (2009)) - [[https://www.guidedogs.org.uk/media/.../1253\_ucl\_gd\_kerb\_heights\_report\_oct\_09.pdf]](https://www.guidedogs.org.uk/media/1976/1253_ucl_gd_kerb_heights_report_oct_09.pdf)

Those with sight loss or autism rely on controlled crossings and clear delineation between the road and the footway to feel safe and confident navigating alone. By removing these vital elements, shared surfaces make all road users, but especially the visually impaired and autistic people, feel anxious and vulnerable when attempting to use the space. Guide Dogs research in 2017 on shared surfaces, [Scared surfaces](file:///D%3A%5CBurness%5CRNIB%5CBurness%20RNIB%5CRNIB%20Street%20charter%5CUK%20Street%20Charters%5CScotland%5CHighland%5CAccessing%20Inverness%5CScared%20surfaces), revealed that significant levels of anxiety and discomfort were created by visiting a shared surface area among a large proportion of road users, but especially among people with disabilities. One in three respondents with a disability said that they would go out of their way to avoid visiting a shared surface street. [

[https://www.guidedogs.org.uk/how-you-can-help/campaigning/shared-surfaces/]](https://www.guidedogs.org.uk/how-you-can-help/campaigning/shared-surfaces/%5D)

In October 2018, Michael Matheson MSP, Cabinet Secretary for Transport, Infrastructure and Connectivity, and Kevin Stewart MSP, Minister for Local Government, Housing and Planning, wrote to all Scottish local authorities, advising that, following the recent launch of the Accessible Travel Strategy by the UK Government, a letter was issued to local authorities in England requesting a pause on all shared space schemes until further research is undertaken. UK Government Local Transport Note 1/11 Shared Space was also withdrawn.

The Scottish ministerial letter highlights the importance of taking account of stakeholder views when considering or designing shared space schemes and the guidance places particular emphasis on the need to adopt an inclusive design approach. Scottish Ministers say that they are committed to developing new guidance on inclusive design for all. It reminded local authorities about their duties under the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 (as amended), and those, in turn (at Regulation 5) set out an obligation on public authorities to assess the impact of any policy or practice on people who share one or more protected characteristics, and that the assessment should include taking evidence from those affected.

The organisations supporting this submission urge Highland Council to pause the development of any new shared surface schemes in Inverness until new guidance is issued and to use controlled crossings within the Academy Street scheme. These should incorporate Audible and Tactile (RTC - Rotating Tactile Cone) facilities to assist visually impaired people to use the crossings confidently and safely and provide

appropriate tactile surface paving with the 'Tail' of the standard 'L' paving layout extended over the full width of any pavement back to the building line. The design should take the opportunity of providing a new much needed controlled crossing on Union Street, at the junction with Academy Street.

**Question 3 - Farraline Park changes**

**The proposals for the Farraline Park area have been designed to make this a safer, more attractive environment to walk and cycle. Has this been achieved?**

**Response:**

We do not think a safer and more attractive environment has been achieved.

The consultation illustrations give rise to some concerns. Picture 2 shows a cyclist on what appears to be the pavement and two riding on the wrong side of the road. Picture 4 indicates that Blue Badge holders are permitted but this is not in the list of proposals.

There is a good deal of speculation over whether the bus station may move to another site in the future. Given this, it might be asked whether the remodelling of Farraline Park represents value for money. For now, the bus station remains in situ in Farraline Park and we find that the plans are worrying from a safety point of view.

'Farraline Park is an accident waiting to happen as pedestrians mill around on areas where buses manoeuvre to get in to stances. The plans make things worse.'

Issues of concern include:

* Buses/coaches struggle with the existing exit layout due to the narrowness of the exit which often leads to vehicle overhang onto the pavement area or so-called 'protected pavement'. A bus driver might assume that pedestrians will see the bus coming and move out of the way. However, a visually impaired person standing on part of this pavement may think they are safe because they are on the pavement and not realise that overhanging parts of a bus could hit them. The narrow exit from Margaret Street on to a narrowed-down Academy Street would exacerbate this and might encroach on to the pavements especially at the exit.
* Given bus overhang, it would be necessary to consider street furniture, street café and any planting placement close to the bus station exits and entrances.
* The lack of a barrier in front of the library to prevent pedestrians/cyclists going onto the operational floor of the bus station.
* The lip on the route between the rail and bus stations is a real barrier to wheelchair users and a tripping hazard for others.
* The need for non-slip pavement materials.
* Positioning of electric charging point for buses at the bus station. The consultation illustrations don't show these. Are more charging points to be installed in pavements when the Low Carbon and Active Travel Hub is established?
* Having a drop off/pick up point at the bus station.

**Question 4 - Railway Terrace**

**To what extent do you agree or disagree with the proposals to develop a cycle route on Railway Terrace to link with the new active travel hub, National Cycle Network Route 1, and Inverness Railway Station?**

**Response:**

We question the basis for this proposal as this area is due for redevelopment when the Post Office move out of Strother's Lane later this year and this might include making changes to the roadway and bus station.

**Question 5 - Falcon Square changes**

**The proposed changes for Falcon Square are intended to create a safer space for walking, cycling and activities that make best use of public open space. Has this been achieved?**

**Response:**

We don't agree that a safer space has been created.

We note that Falcon Square is private property and that the only area of the square touched on by this proposal is at the south end of Academy Street.

This area looks levelled out in the proposals and controlled crossings are removed. Please see earlier comments under crossings.

We note that the plans don't show cycle parking provision.

**Question 6 - Materials and Rain Gardens**

**To what extent do you agree or disagree with the proposal to use higher quality materials and rain gardens in this part of the city centre?**

**Response:**

We agree with the use of higher quality materials and are sceptical about the use of rain gardens.

**Materials**

We welcome the council has responded to earlier feedback about some surfaces being slippery when wet.

We recommend that the pavement colour contrasts against the rest of its surroundings including street furniture, crossings and other features. We would like it to be slip resistant, non-reflective and - most importantly - to retain its colour regardless of the different weather conditions e.g. when wet. We would also like it to maintain its contrasting features at night under different lighting conditions.

In figure 11, the third illustration caption states 'conservation kerbs with contrast in colour tone and texture, along with a 60mm kerb face'. We are pleased that the kerbs are 60mm. However, the kerb and loading bay are both grey in colour, and not contrasting at all. The proposed contrast between the continuous footway and the loading bay is not strong enough and may lead to people with sight loss assuming that this is a safe space to walk in.

**Rain gardens**

Trees could be an attractive addition provided they are in the right place, and species, size, quality, planting and maintenance are appropriate. For instance, wet leaves could become a serious slipping hazard if left to build up as well as being very untidy.

However, whilst there may be an initial aesthetic appeal, we are concerned about the long-term viability and maintenance of the proposed rain gardens. They may prove magnets for cigarette ends and other rubbish and be difficult to keep clean, weeded and healthy whilst not necessarily offering an effective drainage solution. Good maintenance is vital to the inclusion of rain gardens/trees in the scheme.

Currently in Inverness, there are limited grassy areas in the city centre. Grass is often the surface which dogs (including assistance dogs) would relieve themselves on. Guide dog owners have said they have to go to great lengths to find grass, which is not always easily safe to get to, to allow the dog to go to the toilet.

It would be beneficial to have some dog waste bins near the greenery to allow assistance dog users to relieve their dogs here. Alternatively, a designated, central, area for toileting the dogs would be welcomed.

**Conclusion**

In conclusion, we are concerned that the council has under-estimated how busy Academy Street is likely to remain; we do not support the removal of controlled crossings and are concerned by the expanse of levelled shared surfaces; there is a need to ensure that minimum pavement widths are respected within the scheme; that commercial use of the streets is responsibly managed; and that the scheme does not encourage the proliferation of street clutter such as A-boards.