

Enterprise and Business Committee Inquiry into Town Centre Regeneration

Evidence from the Guide Dogs for the Blind Association (Guide Dogs)

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Introduction

The Guide Dogs for the Blind Association (Guide Dogs) welcomes the opportunity to respond to this consultation, and would be pleased to give oral evidence to the Committee.

Guide Dogs' vision is for a society in which blind and partially sighted people enjoy the same freedom of movement as everyone else. Our purpose is to deliver the guide dog service and other mobility services, as well as breaking down barriers - both physical and legal - to enable blind and partially sighted people to get around on their own terms.

Terms of Reference

The terms of reference for the inquiry are:

- What approaches have been followed to successfully deliver and finance the regeneration of town centres in Wales? Are there lessons to be learned from elsewhere?
- How does the Welsh Government use the levers at its disposal to assist in the regeneration of town centres in Wales?

- How are the interests and activities of communities, businesses, local authorities and Welsh Ministers identified and coordinated when developing and implementing town centre regeneration projects?

This response will concern itself with the aspects of the enquiry, which are most relevant to blind and partially sighted people.

1. The roles the Welsh Government and local authorities play in the regeneration of town centres.

In this regard, we would draw the Committee's attention to the Heads of the Valleys Regeneration Strategy, "Turning Heads". This is an example of an over-arching strategy which should inform regeneration projects and so it is interesting to note what the Equality Impact Assessment (EIA) has to say about how this should happen.

"Turning Heads: A Strategy for the Heads of the Valleys 2020' outlines the vision for the Heads of the Valleys regeneration work, in the context of the Wales Spatial Plan. It defines Equal Opportunities as a core element of the work and makes a firm commitment to dealing '...proactively with barriers to participation and success' and to not discriminate against any individual or group."

The EIA goes on to say,

"All activities involve partnerships with different organisations. For example, town centre funding is directed through local authorities. Regeneration activity also takes place in partnership with the third sector and through consultants. Ultimately the stakeholders are the residents, potential residents and visitors to the area."

Unfortunately, we have examples of where consultation and engagement, within the Heads of the Valleys area, is not taking place. A public consultation on plans to regenerate the centre of Aberdare was undertaken by Rhondda Cynon Taff Council in June 2011. A month before, a meeting was held with a group of blind and partially sighted people where specific issues of concern were identified and minuted. The consultants engaged by the Council, Capita Symonds, were represented, and the minutes record heated debate about proposed shared surface areas for pedestrians and vehicles and unsegregated pedestrian and cycling routes through the town.

The proposal to reduce some kerbs to 25mm upstands met with strong opposition from the group. Blind and partially sighted people rely on kerbs to tell them where the footway ends and the road begins, so when kerbs are reduced to this extent, or taken away completely, as in shared surface streets, blind and partially sighted pedestrians can wander into the path of vehicles without being aware of the danger. The Capita Symonds consultant did agree to report back, but when the public exhibition was held the 25mm kerbs were still there on the plans.

To date, no specific feedback has been given to the group, and the engagement process, such as it was, is clearly flawed: The meeting referred to here was held far too late in the planning process; the plans presented were all in print with no accessible alternative versions even discussed; the public exhibition, which a local Guide Dog Owner went to on behalf of the group, was entirely inaccessible and based on complex plans displayed on boards attached to the wall of the church where the exhibition was held. This made explaining the proposed new development even harder: The detailed explanation required to describe the plans was hampered by the physical inaccessibility of the diagrams and pictures set up, as they were, for maximum visual impact.

We would therefore have no hesitation in stating that the consultation process was tokenistic and fruitless, and that engagement, as required under the Council's equality duties, failed. It is significant that no EIA had been considered, so it is hard to see what influence the "Turning Heads" strategy had on the process.

Sadly, there is a similar situation taking place in Abertillery, where changes to the town centre mean that local blind and partially sighted people are afraid to walk their usual routes unaccompanied.

"It's a regular walk for me and my dog, and since they started working there the contractors have been very helpful, taking me around all the obstructions and lorries. Now they've moved to another spot, I can't manage it on my own, and I have to get my wife to come with me. That's ridiculous, I've got a dog to be independent, and I didn't know they were turning it into a no-go area for me!"

Mr N, Guide Dog Owner, Abertillery.

We close this point with another extract from the "Turning Heads" EIA:

Consultation with Equalities Groups

“It is our responsibility to ensure that the views of men and women, disabled people, people from different ethnic backgrounds, with different religious beliefs (including non-belief) and different sexual orientation are taken on board and responded and used to influence our decision making. We recognise that there is a need to identify gaps in our activity where consultation or involvement with equalities groups is not currently taking place.

Those gaps may be filled by undertaking our own consultation activity or by involving disabled people as part of our work directly. However they may also be filled by working with Local Authorities or other partners to ensure that they are able to provide us with information about how they have sought the views of different equalities groups and responded to the different needs identified.

The evidence suggests that input from consultation activity with excluded groups should inform the development of, Master Plans, Equality Statements (see SP1) and HARPS.

In addition to this all documentation including for example grant offer letters, project proposal forms should be reviewed for inclusion of productive equality and diversity actions. This would ensure not only that the issue of consultation and involvement is addressed but that the process is used to develop productive outcomes and that commitment to doing so becomes contractual.”

2. The extent to which businesses and communities are engaged with the public sector led town centre regeneration projects or initiatives, and vice versa.

With regard to the engagement of the community in the regeneration process.

We would refer the Committee to our response to point 1. In addition, we are encouraged to note the introduction of new specific duties for Wales. Of particular relevance in this context are the duties around engagement, and assessing impact. Below is an extract from “Assessing impact: A guide for listed public authorities in Wales” (Equality and Human Rights Commission, 2011).

WHAT THE DUTY REQUIRES ON ASSESSING FOR IMPACT

A listed body in Wales must:

- Assess the likely impact of proposed policies and practices on its ability to comply with the general duty
 - Assess the impact of any policy which is being reviewed and of any proposed revision
 - Publish reports of the assessments where they show a substantial impact (or likely impact) on an authority's ability to meet the general duty
 - Monitor the impact of policies and practices on its ability to meet that duty.
Reports on assessments must set out in particular:
 - The purpose of the policy or practice (or revision) that has been assessed
 - A summary of the steps the authority has taken to carry out the assessment (including relevant engagement)
 - A summary of the information the authority has taken into account in the assessment
 - The results of the assessment
 - Any decisions taken in relation to those results.
- In addition, when assessing for impact on protected groups, listed authorities must:
- Comply with the engagement provisions
 - Have due regard to the relevant information the authority holds.

Sadly, it is our experience that the EIA process is often entirely overlooked when regeneration schemes are proposed. The most glaring example is in Carmarthen where the town square was turned into a shared surface where pedestrians and vehicles mingle with cyclists, children on skateboards and taxis picking up and dropping off passengers.

Shared surface streets are where the road and pavement are built at the same level, removing the kerb, and with cars, buses, cyclists and pedestrians sharing the same surface; sometimes controlled crossings (such as pelican crossings) are also removed. The scheme is said to work through reliance on eye contact to negotiate priority.

Guide Dogs believes shared surface streets create issues for many groups of people including -

- Guide dog owners and long cane users, who use the kerb as navigation clue to know where they are in a street, and who are unable to make eye contact with drivers of vehicles or cyclists.
- Disabled and elderly people, who have to share the same space with noisy and intimidating vehicles and bicycles.
- Young children who no longer know where they can safely cross the road. i.e. without a kerb, how do they know where to stop?

In the case of Caernarfon, the local Access Group tried to make the Council aware of their concerns at an early stage but their views were not taken into account. Subsequent meetings to discuss how the space could be improved and made more user friendly to disabled people resulted in some retrospective measures being introduced. These have increased the overall spend on the regeneration, which could have been avoided if an EIA identifying differential impact had been undertaken.

3. The Impact of Out-of-Town Retail Sites on nearby Town Centres.

Blind and partially sighted people depend on local shops for their every day needs. We are aware of many instances where lifts in the cars of friends and family provide the only means of reaching out of town developments, as public transport is often too infrequent or inaccessible.

By this we mean that buses to out of town developments drop passengers nearby, and a blind or partially sighted person has no means of navigating the shops which are not linked by conventionally laid out streets (with clearly delineated pavements). In these developments, shops are typically orientated around car parks so that buses, if there are any, drop passengers away from their shopping destination. Without sighted assistance, a blind or partially sighted pedestrian would find it very hard or impossible to find their way, probably through car parks and across roads rarely equipped with controlled crossings. The very nature of out of town developments excludes blind and partially sighted people because they are so very difficult to reach, and then potentially dangerous to access.

4. The Importance of Sustainable and Integrated Transport in Town Centres including Traffic Management, Parking and Access.

With regard to integrated transport, and the regeneration of town centres, the challenge for blind and partially sighted people echoes the concerns of older people: There are 115,000 people with sight problems in Wales ranging from those with refractive error (and whose vision could be improved by eye care professionals) to those with a permanent sight loss which is so severe that they are eligible to register as blind or partially sighted. In Wales, 47% of them live alone and there will be nearly 650,000 people of retirement age or over by 2021.

As there is a direct correlation between age and sight loss (90% of the visually impaired population are over 65) it is obvious that the need for an accessible, effective and integrated transport system is becoming even more critical. Without access to a car, they rely on public transport for almost every journey, and are directly affected by decisions made at a strategic level as well as the implementation of local authority policies and other factors beyond their control.

Typically, a blind or partially sighted traveller will walk to their nearest bus stop or train station to make a journey. If the route for pedestrians is dangerous they will be less likely to do so, and the factors that decide this are often connected with the amount of traffic, the quality of the pavements, and simply whether they feel safe. Traditionally kerbed footways clearly delineate between pedestrian and trafficked areas, indicate a safe place to walk, denote the positioning of bus stops and shelters and offer reassurance. Integration of transport modes needs to take these issues into account as walking to and from bus or train stations is a crucial element within the journey.

Accessible and safe pedestrian links between local transport modes and railway stations are vital for blind and partially sighted people, and other vulnerable pedestrians. In Cardiff, for example, several bus lanes run parallel to the frontage of Cardiff Central station, and a blind or partially sighted traveller has to negotiate their way across these either when they alight from a bus or when they leave the station or need to continue their journey by bus. Although kerbs are dropped at crossing points, there is no blister tactile paving and unless the individual is very familiar indeed with the environment, there is considerable risk of walking inadvertently into the road. It is difficult to see how this rail station, possibly the busiest in Wales, could fulfil the expectations of the National Transport Plan, which emphasises the need to integrate transport modes. It is to be hoped that The Regional Transport consortia, working with local authorities, will ensure that dropped kerbs, appropriate tactile paving and controlled crossings make the approach to stations as safe and as accessible as possible for vulnerable pedestrians.

5. The Potential Impact of Marketing and Image on the Regeneration of Town Centres; such as Tourism, Signage, Public Art, Street Furniture, Lighting and Safety Concerns.

Signage, lighting and street furniture can have a very significant impact, for good or ill, on blind and partially sighted people negotiating a street environment. When an EIA is conducted on a town regeneration scheme, and consultation results in appropriate engagement of people with protected characteristics, including those who are blind and partially sighted, these elements of the proposals need to be clearly explained and discussed. There are several good examples within the overall development of an improved public realm in Cardiff. The Council's Access Officer convenes meetings of Cardiff Access Focus Group (CAFG), which represents people with a variety of protected characteristics and presentations are given by the relevant Officers. The way in which schemes are explained needs to be accessible to blind and partially sighted participants, and this is best achieved by site visits and/or the use of tactile models.

This innovative approach to engagement has resulted in a productive relationship between the CAFG and the Council, with accountability on both sides for the improvements to the city centre. Street furniture, in particular, can be hazardous and many regeneration schemes seem to include measures to actively de-clutter the street environment. We have however come across examples of de-cluttering measures, which use bins, seats, planters and bollards to act as a dividing line between the footway and the road where the conventional kerb is removed. This still puts blind and partially sighted people, and other vulnerable pedestrians, at risk of inadvertently stepping into the road in the gaps between the obstructions.

In Aberdare, (referred to in our response to point 1), the regeneration scheme included 300mm high granite blocks, which were immediately identified as a tripping hazard by the group of blind and partially sighted people who met the design consultant. Aesthetic affectations of this nature need to be avoided, as does signage, which is too small or stands too high off the ground, and lighting designed more for its appearance than its effectiveness.

Tactile cues used appropriately are essential for blind and partially sighted people and must be an integral part of the scheme. Colour/tonal contrast of street furniture is important for people with some residual vision, and good quality lighting is also important. These and other design issues are covered in Guide Dogs publication 'Inclusive Streets: Design

Principles for Blind and Partially Sighted People'. The regeneration of town centres, and guidance related to this, should take this into account.

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