

Mobility and Access Committee for  
Scotland (MACS)  
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Edinburgh Active Travel Action Plan  
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**Edinburgh Active Travel Action Plan – comments from Mobility and Access Committee for Scotland (MACS).**

The Mobility and Access Committee for Scotland is pleased to have the opportunity to comment on the draft Edinburgh Active Travel Action Plan, and offers the following comments:

**General:**

There is much to commend in the draft action plan which has the potential to be of considerable benefit to many disabled pedestrians and cyclists. We note and agree the references to removing clutter on footways; to well maintained, wide footpaths; to the provision of good quality lighting, shelter and resting places which are particularly important for disabled users. However, there is also much that could be better expressed or which needs further development.

There are few specific references to disability in the document – a reference to the Public Sector Equality Duty of DDA 2005 and one to Footway parking and the impact on disabled persons and references to “DDA compliant” bus stops and crossings. It is not clear how any bus stop or crossing can be said to be “compliant” with the Disability Discrimination Act.

It is also disappointing that while there is reference to the involvement of external parties such as the NHS, SPOKES and the Cyclists Touring Club, there is no indication of the involvement of local groups representing disabled people or any indication of how they will identify and prioritise making

infrastructure more user friendly for disabled people (and other users). This is in fact an essential element of meeting the Disability Equality Duty to which the document refers on Page 10.

The Headline Actions on page 6 include “producing ...design guidance” and the start of “training programmes” and “setting up a working mechanism for identifying missing and sub-standard links” These activities all need input from disabled people and training in dealing with the needs of disabled people.

We recommend particular reference to 1) the inclusion of people with disability in the Objectives section 2) and their specific needs. Many disabled persons can, with appropriate support engage in active travel. Consideration could be given to the needs in active travel of people with for e.g. hearing or visual impairment.

Consideration could also be given to the need for disabled parking spaces near parks and other areas where active travel can take place e.g. entrances to parks.

There is evidence regarding the benefits of exercise people with health conditions, and in particular mental health conditions. Consideration could be given to schemes which provide walking and cycling opportunities for specific groups and also to the provision of adapted bikes for people with mobility problems.

Finally at the recent ATAP consultation event, there was discussion about the behaviours of different stakeholders. Some consideration should be given to influencing behaviour towards mutual acceptance as road/path users.

### **Specific comments:**

Page 4, para 3: Design Guidance should include reference to the needs of disabled persons and existing guidance relating to specific and their walking and cycling needs. Disabled people also need to be involved in developing the guidance in the same way as cycling organisations are expected to contribute.

Page 4, para 4: Similarly with training, disabled people need to be involved in developing this.

Page 5: There should be reference to the needs of disabled persons in the School Travel Plan

Substandard walking and cycling links can be even more problematic for disabled people. It is essential that local groups representing them are involved in assessing and determining priorities.

Page 6: Personalised Travel Plans could offer a great opportunity to disabled people to plan walking and cycling and be included in overall arrangements.

Page 7: Could the Craigmillar Active Travel Study Guide contain reference on the map to cycling and walking routes, to routes which are suitable for people with mobility problems?

Page 8: We note and agree the importance of meeting the public sector equality duty.

Pages 9 and 10: With reference to signage, there should be acknowledgment that different groups have different signage needs. This relates to the typeface, the x-height of lettering, the use of colour and the positioning. Even the content is important. (This applies not only to visually impaired people but also to people who can't read or those who have learning difficulties. Edinburgh is also a key visitor attraction and consideration needs to be given to those people for whom English is not their first language).

Page 10: Good acknowledge of the problem of street clutter. However the provision of seating can be vitally important for promoting mobility for the many disabled people who can only walk so far without resting.

Page 12: Who determines whether a route to a bus stop or a pedestrian crossing is "DDA compliant" and indeed, how is it defined? We are not aware of formal guidance from Government that defines what is and is not "DDA compliant"! Presumably what is meant is that the routes are wide enough, provided with dropped kerbs/flush crossings where appropriate, provided with the correct form of tactile paving where appropriate (ie laid in accordance with formal government advice and in consultation with local groups representing disabled people (this is in the guidance), adequately signed and lit, etc. In other words, there is no way of defining what is and what is not "DDA compliant" - but you can make provision in accordance with advice on best practice which is critically dependent on consultation with and the involvement of local groups representing disabled people.

Regarding tackling footway parking, we are aware that the London Boroughs have the powers to stop footway parking - indeed footway parking is illegal anywhere in London except where signs indicate it is permitted. Westminster Government has so far resisted extending these powers to local authorities outside London.

Page 21: Cycle Parking - Some employers (and many train companies) offer cycle parking which involves suspending bikes from a hook. These are not suitable for people who do not have good upper body strength. It is noticeable that the section on providing for cyclists is almost twice as long as the section on walking and yet walking is by far the dominant mode of transport and all cycling journeys begin or end on foot! Similar comments apply to monitoring targets

Appendix A: Joint Actions Details. Here we would expect to see reference to local groups representing disabled people as partners in the development of

design, auditing and training, in determining priorities, in monitoring the effectiveness of actions and in advising on tackling footway obstructions.

**Mobility and Access Committee for Scotland (MACS)  
Climate Change Working Group  
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