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**Interim Changes to the Guidance on the use of Tactile Paving Surfaces**

**Department of Transport consultation**

**Response from Rehabilitation Workers Professional Network (RWPN)**

RWPN is the professional body for Rehabilitation Workers in the United Kingdom. It is a membership organisation and its membership is made up of sighted and visually impaired professionals. This response was put out to consultation to all of its members and is the agreed response of 170 Rehabilitation Workers.

This consultation required yes/no answers but we feel that the solutions are not always as clear-cut as the question puts it. The comments reflect this. We hope that the consultation leads on to further discussion and design, particularly with blind and partially sighted people.

**5. Relaxation of the requirement for the back edge of an area of blister paving to be perpendicular to the crossing with two options.**

RWPN’s view

No, we reject this proposal. RWPN rejects both of the proposed alternatives. Whilst we accept that these proposals may save space in confined spaces, we believe that the current guidance, stipulating the use of a long back straight edge, is the best design to allow blind and partially sighted people to align themselves correctly in the direction of crossing. This applies especially to individuals with very low vision or those using a long cane. We feel that the curved approach is not only more impractical to install and could lead to trip hazards if installed badly, but would make the blind or partially sighted person more likely to misalign and veer into traffic whilst crossing the road. The step approach is also confusing and lacks the simplicity that a clear straight line provides.

**6. 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.**

RWPN’s view.

Yes, we support this proposal. RWPN recognises that a consistent, nationally recognised colour scheme has its merits. However, we also recognise that a strong colour/tonal contrast (in both wet and dry conditions) is of more practical use to people with low vision than the presence of a specific colour. With the increasing adoption of paving materials such as Yorkstone, the use of the nationally recognised colour will become increasingly problematic.

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

RWPN’s view

RWPN feels that this proposal is not a simple yes or no. RWPN believes that the best way of delineating the carriageway and the pavement is through the use of a kerb, both for long cane users and people with guide dogs. We believe that this proposal will appear to give the green light to the wider use of flush surfaces, such as shared surface areas, and such surfaces pose a real risk of injury to blind and partially sighted pedestrians.

However, we also recognise that same-level surfaces are becoming more common, and that some form of delineation will be necessary in these situations and that the requirement should be universal. The proposal in this consultation uses blister paving to delineate the road from the pavement. We feel this needs further research. Blister paving is an accepted indicator of a safe(r) crossing point over a road, so the use of blister paving in this proposal seems to imply to blind and partially sighted pedestrians that it is safe to cross at any point along its length. In reality there may be no such safe place to cross along this carriageway and to imply so could be dangerous.

We therefore urge the Department to write to local authorities explaining the importance of the use of kerbs and the risks attached to removing them. But we also urge further research getting an agreed style of tactile paving where such paving is deemed essential.

Suggested improvements

**8. Push-button boxes at both sides of controlled crossings to have tactile rotating cones**

RWPN’s view

Yes we support this proposal. This seems very sensible and will increase the chances of all people who rely on rotating cones to use this feature.

**9. Control boxes to have tactile arrows indicating the direction of crossing**

RWPN’s view

Yes, we support this proposal, but we believe that the inclusion of a tactile arrow is of secondary importance to ensuring that the control box is correctly mounted so that the front face aligns with the direction the person will cross. This alignment, combined with a straight back edge at controlled crossings, is of most help in crossing at the correct angle. A directional arrow would be a helpful addition.

RWPN

1st November 2015