

Mobility and Access Committee for Scotland (MACS)

Area 2D North, Victoria Quay, Edinburgh EH6 6QQ
T: 0131 244 0848
E: MACS@scotland.gsi.gov.uk



Andrew Kelly
Via email: Andrew.kelly@ch2m.com

Our ref:
2016/003

Date:
Oct 2016

Dear Mr Kelly,

CYCLING BY DESIGN

The Mobility and Access Committee for Scotland welcomes the opportunity to comment in respect of Transport Scotland's refresh of the above document. Our comments are enclosed herewith and we hope you find them helpful.

If you require any further information regarding our comments, please contact the Committee secretariat at the address above.

Yours sincerely,

ANNE MACLEAN OBE
Convener

CYCLING BY DESIGN REFRESH RESPONSE OF THE MOBILITY AND ACCESS COMMITTEE FOR SCOTLAND

Page 9 – Design Principles

We believe that added to the design principles should be: to create practical, Safe and Accessible environments for use by all cyclists and also pedestrians when the cycle-way is a shared surface.

Page 16 Part 2.3.4 Develop a Network Plan

Add – whether the proposed network, or part thereof, is solely for cyclists or is a shared area with pedestrians.

2.3.5 Appraise Individual Cycle Routes

If we are to add to the design principles and developing network plans then there must also be a methodology to appraise whether individual cycle routes are suitably accessible and that in the case of shared space between cyclists and pedestrians that there is no conflicts arising especially with regard to use by disabled persons and the accessibility of these individual routes. Where the risk of conflict is identified, we suggest that pedestrians are given explicit priority.

2.3.6 Prioritise Network Development

When identifying the priorities for future development it is imperative that the needs of disabled people are taken into consideration, especially when the cycleway is a shared surface with pedestrians or/and where any pedestrians have to cross the cycleway that appropriate measures are put in place to ensure that it is safe and accessible.

2.3.8.1 Targets

When setting input targets it is important to ensure that staff and volunteers have received suitable training in accessible environments to be able to identify the need of disabled people and any weaknesses within the cycle route that would be detrimental to identifying the need of disabled people when either using the route or having to cross the route to reach another destination.

2.3.8.2 Indicators

Data that identifies how many disabled people are using cycleways would be advantageous for future development. The indicators already highlighted could easily be used for this purpose.

We would also suggest that Network infrastructure indicator tools be added to to take into consideration that identification of use by disabled persons.

3.2 Visibility Parameters

We believe that this section on visibility should also mention identifying signage at a distance by cyclists, especially if it is a shared surface or when pedestrians are having to cross the cycleway, especially for disabled persons, having to cross the cycleway which is likely to necessitate the use of tactile paving.

Figures 4.1 and 4.2

These diagrams both show the use of bollards. It is, therefore, imperative that all bollards have a contrasting reflective strip near the top so that disabled people whose impairment(s) necessitate the need for such identification can easily identify them.

4.4.2

It is imperative that when designing any gated access point that these types of facilities allows easy access for disabled people as well as cyclists through this area.

4.4.3 Cattle Grids and Cycle Gates

It is not only the needs of cyclists that have to be considered but also the needs of any disabled people, after all the cyclist could be a disabled person perhaps on a tandem using a guide or in isolation using a hand-cranked cycle.

5.2.1 With-flow kerb-segregated cycle lane

We draw particular importance to the need for appropriate breaks in segregated kerbs to disabled people. This is necessary for wheelchair users (and those with buggies, wheeled luggage, wheelie bins etc) to cross the kerb. Ramped access to the footway is required at these breaks for the same reason.

5.4 Cycle Lanes at Bus Stops

This section does state that cycleways should be discontinued at any bus stop area. However, this is not always the case at any 'floating bus stops' where the cycle lane often continues through a floating bus stop. We urge caution in their use, pending a thorough assessment of the risk of conflict between pedestrians (especially those aligning from a bus) and cyclists. In cases where floating bus stops are being used appropriate design solutions, signage and the need for tactile paving should be considered to identify to cyclists that pedestrians are likely to be crossing the cycle lane and that pedestrians have right of way.

The diagrams shown should be added to and include the layout where a floating bus stop is being used.

6.1.2 When to Segregate Pedestrians and Cyclists

In paragraph 3 'Use by Disabled People' it is important that, the most recent research by Guide Dogs indicates that a delineation kerb of 60 mm high between cyclists and pedestrians is preferred.

Figure 6.4 Methods of Segregation. Also part 6.2.1.1

These diagrams show a maximum kerb height of 50 mm. However, given the most recent research by Guide Dogs, as above, this should now be changed to 60 mm.

6.2.1.2 Segregation by Central Delineator Strip

Given the most recent research by Guide Dogs it should be stated that the Central Delineator Strip is not the preferred method of segregation.

6.2.1.4 Use of Tactile Paving

Although this section is correct at present it must be kept in mind that the guidance on the use of Tactile Surfaces is due be revisited soon and this may necessitate some changes to this section depending on the outcome of the review of the use of Tactile Surfaces.

6.4.1 and 6.4.3 Design and Disabled People

All our comments above have been at making cycleways, especially if they are shared surfaces, safer for disabled people to use.

However, in addition, we feel that as recent experiences in Edinburgh have shown there are occasions when it is necessary for disabled people, and others, to cross a cycleway and/or shared surface with cyclists and disabled pedestrians. There needs to be some signage developed that will clearly give pedestrians the 'right of way' when crossing a cycleway, especially when it is a shared surface. This could be by way of both design features (eg raised surface) and signage (eg stop signs, give way signs or priority signs showing clearly that the cyclist has to give priority to the pedestrian, whether the pedestrian is disabled or not).

Any such signage would likely be in conjunction with the appropriate tactile surfaces being put in place.

6.5.2 Bollards and Barriers

Why we agree with the sentiments expressed in this section of the document we also feel that it is important that the need to have reflective strips of tonal contrast at the top of the bollards is just as important for disabled people as it is for cyclists and that this should be expressed in this section.

7.2 At Graded Junctions and Crossings

We would point out that this section states: that guidance can be got at Disability Discrimination Act: Good Practice Guide for Roads (Transport Scotland (2009)) for details of the design of flush kerbs and blister tactile paving for disabled people. This needs to be updated and should read: Disability Discrimination Act: Good Practice Guide for Roads (Transport Scotland (2013)) for details of the design of flush kerbs and blister tactile paving for disabled people.

This section will also need to be revised when the revision of Tactile Surfaces is undertaken and completed by the Department of Transport, as will the Good Practice Guide.

7.2.1.2 Figure 7.2

Although this section talks principally about safety for cyclists at a central refuge crossing this diagram, nevertheless, shows it to be a segregated cycleway. Surely then the safety of pedestrians, especially disabled pedestrians, is just as important as the safety of cyclists, but pedestrian safety has not been alluded to.

7.2.2.2

While the photograph in this section clearly shows a shared surface between cyclists and pedestrians it, nevertheless, shows no delineation to segregate cyclists and pedestrians that would be detrimental to the safe use of this for disabled pedestrians.

Figure 7.12

This diagram shows tactile paving to be in red. This has been superseded in 2015 by the Interim Review of Tactile Surfaces by the need for red blister paving at controlled crossings should now be shown as directional blister paving that has more than 50% tonal contrast as opposed to being red.

Figure 7.13

As above please see 'Interim Changes to Tactile Surfaces 2015 changes from colour to 50% plus tonal contrast for controlled crossings.

7.3.2.1

As with other parts of this document, given the recent research by Guide Dogs, any segregation between pedestrians and cyclists should be by means of 60 mm high kerb.

7.3.2.2

This section states that segregation should be by means of a raised white line. As previously mentioned this should now be changed to 60 mm high kerb.

8.1.1 Basic Cycle Parking

This section states that cycle parking should be Convenient, visible, accessible, convenient and easy to use. The photograph shows silver, or stainless steel, bicycle parking frames against a light grey background. This is not suitable because it is in essence light grey against light grey and has no contrast. Any bicycle parking should contrast between the ground and the parking frames and the background and the parking frames so as to be visible for those with a sight impairment or other disability that requires such contrast to enable the cycle parking frames to stand out and not become a hazard that can potentially cause injury if walked into.

8.2

This section states that cycle stands should be sympathetic to the wider environment to enhance their appearance. However, the cycle stands and any other area over the stands should also contrast with the background and the ground so to be visible for disabled people as on-pavement cycle parking can represent an (unpredictable) hazard to visually impaired pedestrians in particular.

Street design and parking provision should discourage the chaining of bikes to signage poles, guardrails etc, as they can be a hazard to pedestrians (especially if they slip down).

8.3.3.1 and 8.3.3.2 Cycle Stands and Lockers

Section gives suggestions for the design of cycle stands and lockers. However, given that many disabled people are likely to use either a tricycle or a hand cranked cycle would it not be prudent to make some allowance to accommodate such vehicles that would inevitably encourage disabled people to cycle as well as those who are not disabled. Similar to the principle of disabled parking bays.

9.1.2 New Developments

Would it not be prudent for developers to also consider facilities that would accommodate disabled cyclists, albeit that it may be by use of adapted cycle equipment, even though it would

take a little more thought. Surely disabled cyclists deserve the same opportunities as non-disabled cyclists.

8.4 Public Cycle Hire

If there are areas where public cycle hire is going to be introduced, including the higher of smart cycles, surely the opportunity for disabled people to hire adapted cycles/tricycles should also be available.

10.2 and 10.2.1

Any areas of ironwork should not clash with the visibility contrasting for disabled people.

10.6.3.5 Sweeping

The regular sweeping of a cycleway, especially if it is a shared surface, would also be beneficial to disabled people, especially wheelchair users who are also liable to get punctures.

11 Cycle Audit System

Any inspector carrying out a cycle audit should receive the appropriate training to enable them to identify accessibility issues during the audit process. This could be of considerable benefit to disabled people especially when a considerable number of cycleways are shared surfaces with pedestrians.

11.4.2 Cycle Audit System

As well as including Data on cycle and traffic flows, accident statistics, current and future trip generators and attractors; it could also prove useful to know how many disabled cyclists are using the facilities. This would be especially useful when upgrading cycleways and/or designing future developments.

A1 Legal Issues

Reference to the Disability Discrimination Acts 1995 and 2005 should be removed and replaced with The Equalities Act 2010.

The mentioned Duties in the Disability Discrimination Acts were incorporated into The Equalities Act in 2010.

The Public Sector Equality Duties under the 2010 Act will require an Equality Impact Assessment for major schemes or policies and the involvement of disability groups in their planning and design.

B Sign and Marking

Reference should also be made to the 2011 Policy Paper by the DfT 'Signing the Way'.

The TSRGD was also revised in 2014 and came into effect in 2016.

It is also possible that some changes may have to be made after the Pavement Parking Bill becomes legislation in Scotland.

Roads and Active Travel Workstream
October 2016