CIHT

Chartered Institution of Highways and Transportation

CIHT Response to the Accessible Transport Policy Commission and the National Centre for Accessible Transport
Call for Evidence - Policy and regulation roadmap for accessible transport

October 2024

For any inquiries, please email technical@ciht.org.uk
The Chartered Institution of Highways and Transportation (CIHT) welcomes the opportunity to respond to the call for evidence by the Accessible Transport Policy Commission and the

National Centre for Accessible Transport (ncat), assisting with the production of a policy and regulation roadmap for accessible transport. CIHT are keen to share knowledge and best practice in this area.

In the CIHT manifesto, _A Transport Network Fit for All Our Futures_, we are clear that an effective highways and transportation network is one that makes transport more accessible for all. Transport solutions should improve social inclusion by putting equity at the heart of policy development.

CIHT's recent report, _Creating a Public Realm for All_ helps transport professionals recognise and respect people's differences. In the report we are clear that accessibility should be a key consideration from the outset of all projects. The people best placed to outline whether a space is accessible or not are the people for whom it currently or threatens to exclude.

Co-cultivation, defined in the report as meaningful engagement and representation from the outset and design through construction, operation, monitoring, and evaluation (rather than just consultation on an almost-completed scheme) serves as a useful approach when thinking about how and when to include people whose perspectives are too often ignored. For a visual explanation of co-cultivation, please see research by Professor Nick Tyler.[1]

Call for evidence questions:

Q3.3 How can national and devolved levels of government collaborate effectively to improve transport delivery for disabled people? What strategies could support this collaboration?

It is essential that all those responsible for transport delivery are aware of the importance of considering accessibility as early as possible within the design process. It is likewise key to understand that it is far more costly to retrospectively alter schemes that have excluded members of the community, if accessibility is treated as an afterthought or not considered at all. As such, CIHT recommends that national and devolved levels of government collaborate to fund disability equality awareness training for all local authority personnel who are designing and changing the public realm. Provision of funding should incentivise disability training by making some of the funding for transport schemes only available to local authorities that have trained staff. CIHT recognises the current pressures on government finances as indicated in the Budget (30 October). However, it is essential that those designing and changing the public realm receive appropriate training, so they are aware of issues faced, to avoid wasting public money on schemes that need to be altered later because they have excluded part of the community.

The regulation of utilities and maintenance works is key to ensuring that temporary disruptions do not render an otherwise accessible space inaccessible for a given period. Relevant street authorities should promote consistent designs regarding signage and wayfinding around temporary works and ensure good practice to ensure that accessibility is considered within maintenance projects.

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[1] Tyler, N. and Guide Dogs (2024) _Designing for Inclusion._ Available at: Technical Report 2024 (gd-prod.azureedge.net)

Q3.5 How can funding be used to improve transport accessibility?

As outlined in response to Q3.3, funding should be used to provide disability equality awareness training for all local authority personnel who are designing and changing the public realm. The provision of funding should be used to incentivise disability training by making some of the funding for transport schemes only available to local authorities that have trained staff.

Early and consistent engagement, in line with the principles of co-cultivation, can help to ensure that funding is utilised as efficiently as possible. For example, retrofitting schemes to remedy previously unidentified or ignored accessibility issues is far more costly than considering accessibility and engagement from the outset. The controversy surrounding the introduction of bus stop bypasses illustrates the issues that can arise if such meaningful engagement is missing.

Q3.8 How well do the transport inaccessibility complaints and compensation processes work? How can disabled people be better supported during these processes?

No comment.

Q3.10 How effective are regulators at enforcing transport accessibility? How could this enforcement be more successful? (By regulators, we mean organisations that oversee compliance of transport organisations to a variety of rules. These include Office of Rail and Road, Traffic Commissioners for Great Britain, Civil Aviation Authority).

No comment.

Q3.12 How well do regulators work with transport organisations and professionals? How can regulatory processes be improved? (By regulators, we mean organisations that oversee compliance of transport organisations to a variety of rules. These include Office of Rail and Road, Traffic Commissioners for Great Britain, Civil Aviation Authority. Some examples of transport organisations include Network Rail, Transport for London, Enterprise, Rent-A-Car, and Ryanair).

No comment.

Q3.15 What barriers to transport are overlooked in policy? How might these be addressed and mitigated?

In our report, _Creating a Public Realm for All,_ CIHT outlines the barriers to transport facing some groups, which can often be overlooked in policy. In particular, the report focuses on barriers facing disabled people looking to walk, wheel and cycle. Please see the table below for a summary of our findings:

Barriers	Proposed mitigations
Spaces face challenges in terms of resilience and usage e.g. weather, under-occupancy, overcrowding and emergency incidents.	Transport professionals must consider resilience and usage during the design process. For more information on navigating climate resilience and adaptation, please see CIHT's most recent publication, _Delivering a Resilient Transport Network._

Different users travel at different speeds e.g. pedestrians, particularly older and disabled people, travel more slowly than those travelling via vehicles or cycles.	In line with good safety practice, if users cannot be suitably separated, speeds must be brought into line with the slowest users.
For many disabled people, there are no accessible alternatives to car use.	Transport professionals should ensure that accessible parking, drop-off and pick-up areas are key considerations in all projects. Our latest policy brief, *Ensuring a Just Transition to Net Zero* shines a spotlight on transport inequalities.
Footways can exclude people e.g. through uneven ground, being too narrow, closed unexpectedly, shared with cyclists.	Footways should be wide, as level as possible allowing for drainage (whether the route is flat, uphill, or downhill), firm, slip resistant, reasonably smooth, uncluttered, well maintained, and predictable. Transport professionals should calculate effective width when calculating available footway width and should subtract the space taken up by street furniture, street traders, queues at bus stops and outside shops and people waiting to cross the road.
Drainage solutions can be dangerous for people who use wheelchairs, canes and crutches.	Recessed chamber covers should be used where possible.
Crossings do not provide disabled people with enough time to cross the road, can be located in places that aren't perceived as safe by disabled people and can lack dropped kerbs.	Crossings must have dropped kerbs and feature visually contrasting tactile paving. Fully controlled crossings give the greatest priority to people walking and wheeling. There should be enough time allocated for everyone to be able to cross safely.
Street furniture can be an aid to some people but pose an obstacle to others.	Consistency should be maintained when designing street furniture and transport professionals should think about how it could be used.
Lighting is needed to illuminate spaces, but lighting can create glare, confusing reflections, pools of bright light and strong shadows.	The Institution of Lighting Professionals provides guidance on lighting public spaces.[2]
Trees and planters can obstruct footways, with leaf fall making the ground slippery.	Transport professionals should plant the right tree in the right place.
A lack of accessible comfort facilities such as benches, green spaces, drinking fountains, shelter and shade, and toilets can exclude people from public spaces, especially disabled people.	Comfort facilities should be provided in appropriate locations to avoid facilitating anti-social behaviour. Toilets should be signposted, regularly maintained, and available at all times. Where possible, Changing Places toilets should be provided.[3]
Signage can be inaccessible to some people, e.g. some people with a learning difficulty.	Signs should be discussed and co-designed with relevant user groups. Signs should be

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[2] Resources | Institution of Lighting Professionals (theilp.org.uk)

[3] CIHT (2024) *Creating a Public Realm for All.* Available at: Creating a public realm for all (ciht.org.uk)

	clear, consistent, concise, and placed at regular intervals along routes
An otherwise accessible space can be rendered inaccessible for periods of time e.g. because of roadworks and maintenance.	Accessibility should be considered as a key priority when planning roadworks and maintenance, with an accessible alternative route provided and clearly signposted.

Q3.17 What is one key issue about transport accessibility you would like to address to policymakers?

Facilitating behaviour change amongst transport professionals so that more people recognise that accessibility is an essential aspect of their work is key to addressing transport accessibility issues. As such, CIHT recommends that policymakers use funding to promote this behaviour change, funding disability equality awareness training for all local authority personnel who design and change the public realm in any way. Policymakers should incentivise the take up of disability training by making some of the funding for transport schemes only available to local authorities that have trained staff.

Q3.20 What are the best methods to ensure that changes affecting disabled people involve their direct input? Can you provide real-life examples of successful and unsuccessful approaches?

To ensure that disabled people have direct input into changes that affect their lives, CIHT recommends that transport professionals observe the principles of co-cultivation, namely early engagement with all those with an interest in a proposed project or upgrade, sustained throughout the duration of the project. *Creating a Public Realm for All* outlines how designs should be created by a diverse design team, including as many people with protected characteristics as defined by the Equality Act 2010 as possible.

Transport professionals should be wary of relying on existing data when considering use of a space as this data will not capture potential use by currently excluded groups. When gathering new data, transport professionals should remember that surveys can exclude some people, so engagement activities should feature a range of methods, including direct interviews. Designers should be mindful of the times, places, and formats that are used for engagement to avoid excluding any user group. Most importantly, engagement should be considered throughout the duration of the project, to ensure that everyone who has an interest in the work can share their views and work towards solutions collaboratively, as such an approach proves far more fruitful than having to remedy previously unidentified accessibility concerns at the end of the project.

Action Disability Kensington and Chelsea's (ADKC) Access Group has a positive collaboration and experience with the local council, the Royal Borough of Kensington and Chelsea (RBKC). ADKC Access Group's members have been working closely with RBKC's Network Management team since 2021, helping them to try to understand more about some of the challenges disabled people encounter when trying to negotiate work sites while going about their daily business.[4]

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[4] CIHT (2024) *Creating a Public Realm for All*. Available at: Creating a public realm for all (ciht.org.uk)

Q3.22 Finally, what other strategies could be implemented to ensure disabled people are central to decision-making?

As outlined throughout this response, CIHT believes that co-cultivation is the most important strategy to be considered to ensure that disabled people are central to decision making. Co-cultivation ensures that all those who have an interest in and are impacted by proposed changes are involved throughout the entirety of the project lifespan, including post-implementation monitoring. This approach means that feedback can be incorporated in a timely way, avoiding wasted effort and delays. Co-cultivation also promotes a sense of shared understanding, which is key given the way that perspectives from users and designers can differ at times.