



## **Chartered Institution Highways & Transportation response to the Department for Transport's consultation on its Accessibility action plan.**

*Andrew Hugill, Director of Policy & Technical Affairs, Chartered Institution of Highways and Transportation (CIHT), Tel: +44 (0)20 7336 1578, Email: [andrew.hugill@ciht.org.uk](mailto:andrew.hugill@ciht.org.uk)*

CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and a number of international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Part of our vision is to demonstrate transport infrastructure's contribution to a prosperous economy and a healthy and inclusive society. Our values are to be Professional, Inclusive, Collaborative and Progressive.

### **1. Introduction**

**1.1.** CIHT welcomes the opportunity to respond to the Department for Transport's consultation on its Accessibility action plan. The breadth of the plan and the wide ranging nature of the actions set out mean that we do not have a particular and detailed response to all of the questions and actions proposed and therefore this response is set out in two parts;

- 1.1.1.** A set of general comments and proposals on the issues highlighted by the plan. We believe some of these are fundamental to the successful creation of a transport System that is open to everyone and would therefore hope that they are taken into account in the development of the plan.
- 1.1.2.** Detailed comments and responses to specific questions and actions. Where we do not specifically address a question or action we would ask that our general comments are taken into account in the department's consideration of its response to that particular issue.

### **2. General comments**

**2.1.** The wide ranging nature of the action plan is welcome but it's separation into many different areas with responsibilities resting with many differing organisations highlights a fundamental issue. Creating accessible places and services require a holistic approach, a fragmented response is unlikely to be successful.

**2.2.** There are two key strands to this holistic approach;

- Transport is not considered alongside the built environment in policy terms
- Transport is considered from the viewpoint of individual modes rather than consideration of the user making a journey.

**2.3.** With regards to the first of these strands CIHT made the following points in our evidence to the Women and Equalities Committee at the end of 2015<sup>1</sup> and these underpin our comments to this consultation

- 2.3.1.** Government should be clear that the consideration of built environment has to include highways and transport networks and the services they deliver as they are often viewed separately from buildings.
- 2.3.2.** There has to be better co-ordination across government in this regard or efforts to create places and services that are accessible to all will be diluted. It must be made clear that the built environment should be accessible for all.
- 2.3.3.** There should be a clear strategy, set nationally, for collaboration between different policy areas in making inclusive and accessible environments. The strategy must include the entire range of professional inputs so that separate commissioning bodies are clear who should be involved, how they will contribute and how accessible environments can be delivered.

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<sup>1</sup> [CIHT response to Women and Equalities committee 2016](#)

- 2.3.4. The guidance required to support this range of inputs should be refreshed or developed and used in the development and training of the people delivering services across the built environment.
- 2.3.5. There must be a better understanding of Diversity and Inclusion, both in terms of the needs of all when using the built environment and by those that are delivering services to the built environment. Government should commission detailed research into the differing needs of people with physical and mental impairments, including how the needs of different groups should be balanced.
- 2.4. With regards to the second strand, the plan tends to focus on actions to improve the use of individual transport modes without recognition of three key points that, if given due consideration, are likely to lead to a more effective improvement in the creation of inclusive environments.
- 2.4.1. The first is that highways and transport networks have two key functions; that of providing for the **movement** of people and goods and a contribution to the **place** in which they sit. Movement has been the focus of government and the sector but place is of great importance when considering accessibility.
- 2.4.2. The second is the scale of that latter contribution. Highway and Transport Networks account for a significant proportion of the public realm and have a range of vital functions alongside their movement function, enabling access to all services and businesses.
- 2.4.3. The door to door journey is of particular importance when considering accessibility and people's needs in undertaking a journey should be the focus of the plan
- 2.5. CIHT has consistently called for the creation of a transport strategy that considers all modes and sets a clear strategy for how different modes work together<sup>2</sup> Such a strategy would be able to set out clearly how transport enables accessibility allowing those responsible for different modes to be clear in their approach.
- 2.6. CIHT has also called for a much closer integration of planning and transport<sup>3</sup> as these policy areas are intertwined and the work on creating accessible buildings needs to link clearly to creating accessible transport services. It is worth re-iterating that a significant proportion of the public realm is streets, which provide access to all properties and therefore need to be a fundamental part of the approach to creating accessible environments. The way in which policies on transport and planning are integrated to provide accessible properties should be made clearer.
- 2.7. Government policy has increasingly been influenced by the localism agenda. CIHT supported the simplification of planning policy and government's push for more local decision making. However, leadership is required at a national level, where ultimately the policy framework, through the National Planning Policy Framework (NPPF), is set. Changes to the planning system, including the reduction of associated planning practice guidance, has not delivered the level of built environment that is required to provide for people with disabilities. Subsequently this has failed to improve accessibility for all sections of society.
- 2.7.1. The NPPF itself refers to disability only twice.
- Paragraph 35 "Consider the needs of people with disabilities by all modes of transport".
  - Paragraph 50 "Plan for a mix of housing based on current and future demographic trends, market trend and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes".
- 2.7.2. This is a good example of how the strategy for achieving inclusive built environments is weak in that there is no clarity for how an overall approach will be delivered in a complex mix of different organisations with different roles and purposes. There is a minimal level of policy co-ordination around inclusive environments, for example the effective delivery of any housing policy and delivery requires an effective sustainable transport policy. These areas

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<sup>2</sup> [CIHT response to the governments Transport investment strategy](#)

<sup>3</sup> [CIHT response to consultation on NPPF](#)

are managed by separate parts of organisations at a local, sub-national and national level. Policy making must be integrated, cross-departmental and consistent nationwide.

**2.7.3.** The following diagram, shows how such a strategy might sit alongside other key requirements in creating inclusive transport & environments as required by the Section 149 of the Equality Act 2010 (s149 EA2010). That requirement should be the fundamental driver for action by authorities who commission and lead work in the transport and built environment

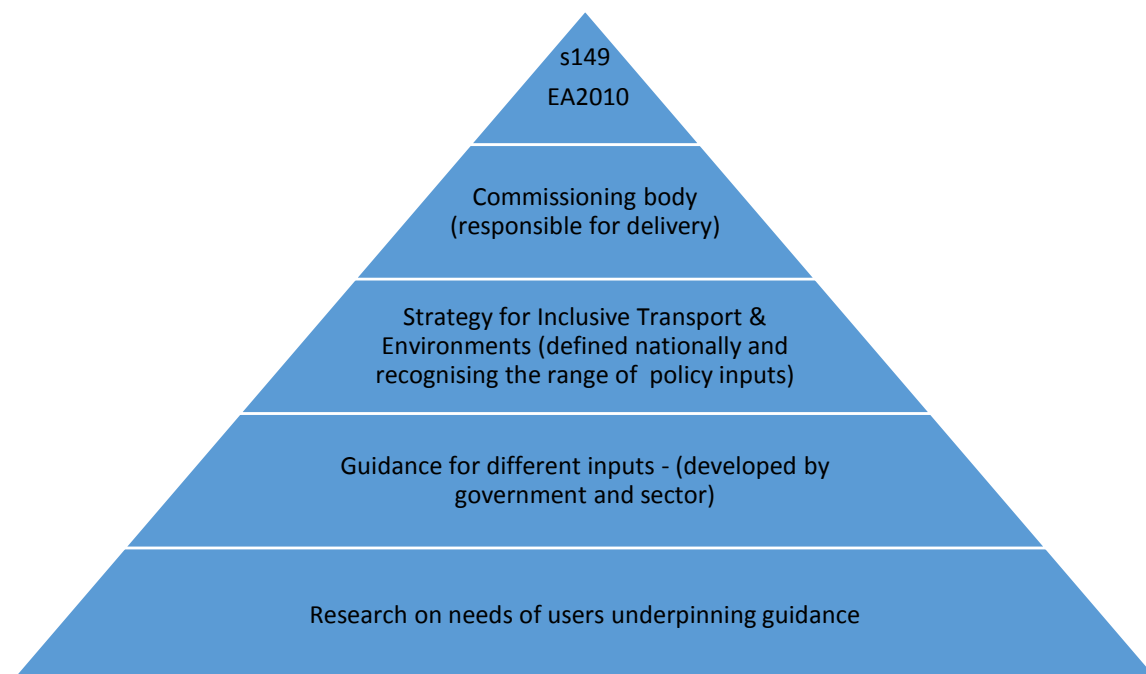


Fig 1. The conditions needed to meet the requirement for inclusive environments

**3. Our response is built on CIHT’s experience in developing guidance for the Highways and Transport sector.**

**3.1.** CIHT has been instrumental in promoting the consideration of accessibility, diversity and inclusion, working collaboratively alongside the Department for Transport and others to develop guidance in the Highways and Transportation sector. This is summarised in the table below.

CIHT led	Working collaboratively with others
<a href="#">Reducing Mobility handicaps towards a barrier free environment 1991</a>	<a href="#">Manual for Streets 1 - 1997 DfT &amp; DCLG</a>
<a href="#">Manual for Streets 2 2010</a>	
<a href="#">A Transport Journey to a Healthier Life - 2016</a>	<a href="#">Inclusive Mobility - 2005 - DfT</a>
<a href="#">Routes to Diversity and Inclusion toolkit 2016</a>	<a href="#">Design Council - Inclusion by Design</a>
<a href="#">Planning for cycling 2014</a>	<a href="#">Built Environment Professional Education Project</a>
<a href="#">Planning for walking 2015</a>	<a href="#">DfT TAL 5/11 Quality Audit</a>
<a href="#">Designing for Walking 2015</a>	<a href="#">Design Council - Inclusive Environments</a>

<a href="#">Involving the public and other stakeholders 2015</a>	

- 3.2. CIHT endeavoured to ensure that the importance of place is recognised in the way that our highways and transportation networks are planned and designed and how they integrate with the built environment. CIHT have worked with the Department for Transport on Manual for Streets 1 & 2 and is aware the department is considering the refresh of these documents. These documents outline the importance of our networks to communities and seek to guide professionals in ensuring all the needs of our communities are met, whilst promoting inclusive design solutions. Inclusive design has been fundamental to the development of this approach. CIHT were pleased that the Lords Select committee for the Built Environment recognised the value of the Manual for Streets approach by including a recommendation in its February 2016 report<sup>4</sup> that the document should be mandated to all local authorities.
- 3.3. CIHT recognise that the department is commissioning a research project to understand what is required for an update of Inclusive mobility. This is a key document which should provide the clarity of approach and strategy to creating inclusive environments and therefore hope that the department takes into account the issues outlined above when considering its approach.
- 3.4. CIHT has developed an approach to widening the understanding of the link behind transport and health and wellbeing in its document [A Transport Journey to a Healthier Life](#)<sup>5</sup> which suggested further work was needed in key areas. The key findings from the report were:
  - 3.4.1. There are opportunities to improve links between transport, health and wellbeing, but progress is being hampered by a lack of strategic integration nationally and joint working locally.
  - 3.4.2. The health and wellbeing benefits of transport investment need to be measured in terms of cost and non-monetary values to better influence funding decisions.
  - 3.4.3. The local planning system should take more account of health and wellbeing in decision-making.
  - 3.4.4. The influence of transport choices on people’s mental health and wellbeing should be emphasised more in policy and practice.
  - 3.4.5. The transport sector is failing to take full account of the health and wellbeing benefits of walking.
- 3.5. In developing guidance to improve the work of our members and listening to the views of practitioners in the sector we are clear that there has been insufficient research both into the needs of different groups across all types of disability and impairment (particularly mental health issues) and how these different needs should be brought together. Whilst there are some good examples of approaches, these are not consistent. This consistency is key and should underpin any approach to improving the way different sectors create inclusive design. It is not effective to expect a wide range of different professional disciplines and commissioning organisations to start from first principles and interact with a huge number of representative groups and expect consistency of approach.
- 3.6. CIHT is starting to address the issues of Diversity and Inclusion within our sectors supply chain through its [Routes to Diversity and Inclusion toolkit 2016](#).<sup>6</sup> The Highways and Transportation sector is generally not sufficiently diverse and CIHT will continue to encourage the sector to better reflect the society it delivers services to. CIHT has established a diversity and inclusion charter for industry partners to sign-up to and show their commitment to positive change.

**4. Design and management of the public realm**

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<sup>4</sup> <https://www.publications.parliament.uk/pa/ld201516/ldselect/ldbuilt/100/100.pdf>  
<sup>5</sup> <http://www.ciht.org.uk/en/knowledge/transport-mobility-and-wellbeing/index.cfm>  
<sup>6</sup> <http://www.ciht.org.uk/en/document-summary/index.cfm/docid/C83B8131-5FB7-49CE-BE0BBDAAE8889550>

**4.1** As our response has highlighted above CIHT has championed the proper consideration of the needs of all when considering the design of streets. It is clear however that there is still a long way to go in certain parts of the highways and built environment to balance the needs of people who are not driving vehicles but using other transport modes, or are cycling or walking, or who have particular needs because of physical or mental impairments.

**4.2** The balancing of the movement and place functions of our highway and transport networks is a key area for consideration and is increasingly complex. There are clearly parts of the network where the movement function is the most important and the needs of transport users take priority. For example the motorway network is primarily about the movement of people and goods. For large parts of the highway network the balance is less clear and there are parts where the movement function, particularly by vehicles, has dominated the place function to the detriment of a wide group of users, both in movement and place terms. This detriment includes non-use of streets by particular users and corresponding impacts across the health and well-being spectrum. It is this balance that the Manual for Streets approach has attempted to alter by better design and a consideration of a wider set of user needs.

**4.3** The use of shared space as a solution to that lack of balance has attracted a great deal of attention with some clear criticisms that it does not consider the needs of certain groups.

**4.4** CIHT is looking at a range of existing street projects including shared space and as part of the shared space review we will be producing a set of recommendations. The review and the recommendations will aim to provide clarity about how street projects should be considered, designed and implemented.

**4.5** The work we are doing is being shaped by, and tested with, a steering group, with representatives from a range of external organisations, including the Disabled Persons Transport Advisory Committee and also Lord Holmes who has a particular interest in how blind and visually impaired people use and navigate shared space schemes.

**4.6** Whilst the review is still underway some broad themes are becoming apparent.

**4.6.1** The term shared space is being used to describe a wide range of different situations that have different factors that may require different approaches in design.

**4.6.2** The reasons why schemes are implemented and the objectives of them vary but creating an inclusive environment is rare as an objective and therefore monitoring of the benefits/impacts of the schemes in this respect are less clear than other stated objectives. A clear overarching requirement to create inclusive environments as suggested in our hierarchy above (fig. 1) and objectives around inclusivity would bring a much clearer perspective on the appropriate solution.

**4.6.3** The needs of all users is a complex mix of factors and schemes have taken different approaches leading to inconsistency. Further research into these needs as stated above is fundamental to achieve a consistency of approach. A key consideration is around the crossing of areas which vehicles use.

**4.6.4** There may be a requirement to consider how we balance the needs of people driving vehicles and other people in certain areas of our built up areas, in particular where those needs interact. There are a number of ways that this may be achieved, including changes to the Highway Code, to secondary legislation or to primary legislation.

**4.7** The development of technology is a key area for continuing consideration. This includes both technology linked to vehicles and technology used by people with different needs to navigate around the built environment. The development of autonomous vehicles and the way they interact with other users will create a series of important questions that may contribute to the issues of inclusive environments.

**4.8** The availability of highway space in urban environments to meet the needs of all its users will continue to be a key issue in the long term as those needs become more understood. CIHT has

carried out a piece of work with its members called [CIHT Futures](#)<sup>7</sup> which has raised some key issues for how we should be planning for transport in the future.

## **5. The role of designers, architects and built environment specialists in ensuring accessibility and inclusivity**

- 5.1** As outlined above CIHT believe that organisations representing professionals engaged in the built environment, have a key role in assisting government to address the challenges in ensuring accessibility and inclusivity.
- 5.2** Professionals have a role in developing guidance alongside government and CIHT will continue to do so, but this also has to be done across the whole of government not just based on a departmental approach to a particular function.
- 5.3** The understanding of the importance of accessibility and inclusive design has to be ingrained into education and professional development at all levels of those involved in the built environment. Much of our infrastructure requires an engineering input but there are a range of other inputs that are required to create inclusive environments. The strategy for bringing these different inputs together should be developed. CIHT has already been involved with a range of other built environment organisations and would be willing to help develop that strategy with government. Without a base understanding of the needs we are seeking to meet and a strategy for putting them into place, we will not achieve a consistency around accessibility and inclusiveness.
- 5.4** CIHT is a supporter of the Built Environment Professional Education project and also of the Design Council's Inclusive Environments project.

## **6. Local involvement in decision making**

- 6.1** When developing changes to the built environment it is important that the public, including those with specific needs are properly involved. CIHT has produced guidance in this [area](#)<sup>8</sup>.
- 6.2** Local authorities have a clear role in addressing many of the issues outlined in our response, including co-ordinating a range of different inputs that are needed to create accessible places. As outlined above CIHT believes that they need the assistance of a nationally developed strategy that shows how these inputs should be co-ordinated.

## **7. Specific Comments on Actions**

- 7.1.** Action 1 –as outlined above we fully support this move as being a fundamental part of delivering a strategy for accessibility in the built environment and will support in whatever way we can.
- 7.2.** Action 2 – Clearly we value the emphasis that the Department has put on our work on shared space and look forward to working constructively with them and others to deliver the recommendations we will be making and that we broadly outline in Section 4.6 above.
- 7.3.** Action 3 - We support this as part of a wider consideration of guidance in the built environment.
- 7.4.** Action 11 – Where research is carried out that reflects on people's needs this needs to be shared across transport modes including with Highways England and others so it can be used as part of the wider research we call for in our response.
- 7.5.** Action 17 – When commissioning research this should be across modes and the outcomes bought together to facilitate the improvement of all transport modes, not done on an individual mode basis.
- 7.6.** Action 24 – The role of monitoring equality and awareness training needs to be considered on a sector wide basis.

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<sup>7</sup> <http://www.ciht.org.uk/en/knowledge/futures/index.cfm>

<sup>8</sup> <http://www.ciht.org.uk/en/knowledge/streets-and-transport-in-the-urban-environment/index.cfm>

- 7.7.** Actions 26 and 27 – the release of this research information that has already been commissioned needs to identify those areas where research is still required and be published in a form that assists the improvement across all transport modes.
- 7.8.** Action 39 – The terms of this survey need to be wide enough to allow the right parking solution to be reached in an area, rather than too narrow a focus that causes wider issues.
- 7.9.** Action 40 and 41 – As above these items of research should be made available as part of a holistic piece of research to help enable the creation of inclusive environments.
- 7.10.** Action 42-44 CIHT was pleased that DfT supported an award for Inclusive transportation in 2017 and hopes that they continue to support it so that exemplars of good practice can be disseminated.
- 7.11.** Action 45-47 We welcome these actions and would ask that they are made available to assist others working across the sector to improve understanding of the issues