

Enterprise and Business Committee

Inquiry into Town Centre Regeneration

Evidence from Diverse Cymru (Formerly Cardiff and Vale Coalition of Disabled People (CVCDP) and Awetu)

Respondent's Details:

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Publication:

We are happy for this response to be published in full, or in parts and to be available to the public. This includes the above named person and contact details.

We would also be happy to appear before the committee or to provide any further evidence and/or information the Committee feel would be useful to them.

Background to the organisation:

Cardiff and Vale Coalition of Disabled People (CVCDP) campaign on a local and national level to make a positive difference to the daily lives of all disabled people. Awetu is the All-Wales BME Mental Health organisation.

We advise a range of statutory, private and voluntary sector organisations on disability, BME mental health and equality issues, encouraging them to adopt a Social Model approach to their work.

We operate an Advocacy Service, a Youth Service, a Service User Involvement Service and an Outreach Service. We also run an Independent Living Scheme, working with people who receive Direct Payments. This scheme provides information, support, and training to disabled people who wish to employ people to provide their personal support. Clients supported are referred from Mental Health Impairment, Older People, Older People Mental Health, Children's Services, and Learning Difficulties Social Work Teams.

CVCDP and Awetu offer advice and signposting to disabled and BME people experiencing mental distress in the Cardiff and Vale of Glamorgan area, and our campaign/work with service providers helps to ensure that they deliver the services they have a right to access. We currently have in excess of 350 members, all of whom have some form of impairment in addition to a BME Mental Health service user database.

In responding to this consultation CVCDP and Awetu have involved a number of members of staff and collated the experiences common to service users and members.

Our response to this consultation is specifically related to our role as a representative organisation of disabled people in Wales, and therefore focuses on disability-related aspects of regeneration.

Summary and Recommendations:

- Barriers to access for disabled people are often built into regeneration initiatives accidentally and are not well understood.
- Transportation and accessible transport is critical to disabled people, both to and within town centres.
- ShopMobility and similar schemes are essential to disabled people and need to be built into planning, including marketing, and sited in obvious places.
- Design of housing linked to commercial development should include best practice accessibility guidelines such as 'homes for life'.
- Private companies, such as transport providers, should be required to work with public sector organisations and disabled people to remove barriers to access.
- Planning Officers require more detailed guidance on true accessibility, not merely minimum legal requirements, and additional training.
- Involving disabled people with a range of impairments is the only way to ensure that regeneration projects can be impact assessed and inclusive from the development stage, rather than building accessibility in at a later stage.
- Signage should be clear, directional and provided in a range of formats.

Evidence and information:

The role of the Welsh Government and Local Authorities

1. Planning processes do not currently lend themselves to full consideration and integration of accessibility concerns. This results in barriers to access being accidentally built into projects.
2. Part of these considerations must include the need for individual space, not merely shared space and psychological impacts of the planning and design process on disabled people and their feelings of safety, security and belonging in communities and town centres.
3. The standards for accessibility, for example Part M (Approved Document M) of schedule 1 of the Building Regulations, which specifies minimum access standards, are assumed by many planners to specify best practice. There is a misconception that by complying with Part M building and planning processes and final builds will be fully accessible.
4. Contrary to this belief, in fact, these minimum standards are designed purely to ensure a minimum level of service and property accessibility, rather than meeting the needs of disabled citizens.
5. More comprehensive guidance, designed around best practice, inclusion, engagement and more in-depth coverage of accessibility is contained within TAN 12. However, our experience, primarily through the Cardiff Access Group, is that planning officers and others responsible for construction projects rarely understand TAN 12 and even more rarely apply these principles.
6. As a result there are many examples of projects in the public realm being commissioned, designed and only recognising access issues at a later point. This failure to build in engagement with disabled people and to consider truly accessible design from the start of the planning process results in delays to regeneration projects as well as increased costs.
7. An example of such a process is when a bridge over a railway was being planned and designed in Cardiff, planners included ramps for disabled access in the plans, feeling this would meet accessibility requirements. When the plans were published, shortly before the project was due to commence construction, disabled people and equality representatives pointed out that the ramps were designed at too steep a gradient to allow them to be realistically used by wheelchair users. The project had to be redesigned, involving disabled

people, Cardiff Access Group and the Council Access Officer. The time and redesign has resulted in a bridge which can be used by wheelchair users, with added benefits to parents with prams and pushchairs, as well as other groups, but the costs involved in having to redesign the bridge, rather than involving disabled people from the outset, have been significant.

8. **As a result of the above issues we strongly recommend that:**

- **Disabled people should be involved in planning processes from the outset**
- **The Welsh Government should issue guidance or standards clarifying best practice on accessible design**
- **TAN 12 should be properly adhered to by planners and integrated into accessible design at Local Authority level**
- **Planning Officers should be supported and encouraged, at the least, to receive comprehensive training on accessible design and Equality Assessments.**
- **All planning applications should undergo equality assessments in accordance with the Specific Duties for Wales under the Equality Act 2010.**
- **Private sector companies should be required to work with Local Authorities and disabled people when designing public work, for example train stations, or public access routes via private property.**

Community engagement

9. As indicated above disabled people are rarely involved in planning processes from the outset of a project, yet not doing so can result in significant costs and delays as well as inappropriate environments and schemes.

10. Given the range of impairments and the various impacts of disability on access, it is essential to ensure that the views and concerns of a wide range of disabled people are gathered at the start of a project, using methods appropriate for the groups and individuals concerned.

11. Access is not merely about getting into buildings or mobility impairments. There are clear impacts of building design on visually impaired people, in terms of signage, lighting and layout of both buildings and town centres; on hearing impaired people in terms of integration of hearing loops and noise reduction; on people with learning disabilities in terms of signage and ease of getting around, amongst other groups of people.

12. Access groups are a good avenue to involving disabled people and the **Welsh Government should encourage or require planners and those involved in town centre regeneration and/or construction projects to involve disabled people and access groups in all projects affecting the public realm.**

The importance of sustainable and integrated transport

13. Transportation is the most important concern consistently highlighted by members of the Access Group. This concern falls into the following main categories: Transportation to the town centre; transportation within the town centre; and unique modes of transport including ShopMobility.

14. Regarding transportation to the town centre there are considerable concerns regarding both cars and ensuring that driving into town centres is quick and congestion is relieved and in terms of public transport.

15. Many disabled people rely on their own cars to be able to get around, yet **poorly planned access to town centres can result in long queues and significant congestion, making the journey unbearably difficult for some disabled people.** Once in the town centre clearly signposted accessible parking, close to other facilities that enable access within the town

centre is critical to enabling disabled people to use their town centres effectively.

16. There are also many disabled people who rely on public transport to access town centres and cannot drive. For such people it is essential that **central bus and train stations are easily identified, close to the town centre, link with other facilities to enable easy access around the town centre and that signposting allows for quick and easy access to the town centre.**
17. For example where the bus and train station are in different parts of the town (e.g. in Swansea) cheap, integrated transport between the two locations, which is clearly advertised and identifiable is critical to enabling onward travel. Where the train and bus station are not visible from the town centre (e.g. Cardiff) it is essential that signage and other methods are utilised to identify quick access to the town centre.
18. Another aspect of getting into town centres for disabled people who rely on public transport relates to ensuring that **busses stop close to all areas of the city centre and that bus routes clearly state where the bus stops in the centre**, in order to avoid confusion and complications in continuing travel around the town centre.
19. In some cases there are concerns regarding transportation within town centres, over and above those noted above regarding initially accessing the town centre. For example there are concerns where a town centre is large or dispersed, where initiatives such as accessible cycling and golf buggies can assist disabled people to get around the centre.
20. ShopMobility is essential to many disabled people, to allow them to continue their journey within the town centre, yet **in many towns the ShopMobility centre is isolated, not clearly signposted and there is no integration between parking and ShopMobility.** In such cases disabled people may not be able to find and access the centre, making it extremely difficult or impossible for them to shop in town centres.

Impacts of out of town retail sites

21. For many disabled people transportation into and around town centres is making it extremely difficult, if not impossible, to go shopping or visit town centres. Therefore many are currently relying on out of town retail sites, but having to visit multiple sites in order to complete their shopping. This is at considerable cost and difficulty to themselves.
22. Additionally disabled parking spaces are often situated close to the most popular shops, but due to the nature of out of town retail sites, often containing large stores, this may be a significant distance from other shops. **It is important to ensure that disabled parking spaces are distributed throughout out of town retail sites and are situated close to all stores and facilities.**
23. In other situations disabled people are unable to drive and public transport to out of town retail sites is often infrequent. Once at the retail site these are often not designed with pedestrians in mind, resulting in significant danger when crossing main roads from one part of the retail park to another.
24. **When planning out of town retail sites it is essential to ensure that pedestrian and public transport access is built into their design**, in addition to sufficient disabled parking.

Signage, lighting and safety concerns.

25. For some disabled people, especially those with learning disabilities and difficulties, the amount of signage in town centres can lead to an inability to distinguish and identify directions

to places they want to get to.

26. In such cases techniques such as larger signs for the most important landmarks, ensuring signs are in accessible colours and use a range of colours, without using too many and further complicating signage, and using a mix of tactile, graphic and written signage can be extremely useful. This is also beneficial to other groups of people, such as people whose first language is not English or Welsh.
27. Sufficient lighting is also a serious concern for visually impaired and other disabled people, both in terms of being able to identify hazards and navigate a town centre and in terms of feeling safe within a town centre.
28. **Signage and appropriate lighting design should involve disabled people. Guidelines should be disseminated and Local Authorities and other planners should be required to integrate the needs of disabled people in terms of signage and lighting.**

Housing

29. Many planning processes, especially those for commercial outlets and shops, include an element of housing. This is welcome as one method of addressing housing shortages.
30. However there are a few concerns highlighted by disabled people in this regard. Often such housing is not designed for longevity and therefore results in homes that need frequent renovation or become inappropriate for disabled people within a relatively short time-scale. Sustainable housing design should be integrated into planning processes for housing associated with other regeneration developments.
31. Consideration should also be given to people's need to separate social and home life. Whilst town centre housing is important, it is also important to ensure people who may need a quiet environment or do not feel safe living in the town centre do not feel pressurised into living in the town centre. Regeneration and housing development in town centres should be matched by other developments elsewhere in the town.
32. Additionally many of these housing developments are above retail premises and do not take account of accessibility concerns. As the population demographics are changing and we have an ageing population in Wales, **we feel it is imperative to ensure that standards around 'homes for life' are incorporated into housing planning.** This ensures that as people age and require adaptations to their homes, these are built into the property from the start, enabling people to stay in their own home, rather than having to move to a specialist adapted property.

In summary, transportation to and within town centres, by both private and public transport, is the most important concern for disabled people. Disabled people's involvement in planning processes, educating planning officers and reinforcing best practice accessibility standards would greatly improve town centre regeneration projects for disabled people.