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# Pedestrian Safety Policy

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Developed in consultation with Blind Citizens Australia’s ‘National Policy Council’

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Table of Contents

[About Blind Citizens Australia 3](#_Toc113543595)

[About Australians who are blind, or vision impaired 3](#_Toc113543596)

[1. Purpose of this policy 4](#_Toc113543597)

[1.1 What the policy is about 4](#_Toc113543598)

[1.2 How the policy was developed 5](#_Toc113543599)

[1.3 How the Policy should be used 5](#_Toc113543600)

[2. Statement of principles 6](#_Toc113543601)

[2.1 Hazards in the Community 6](#_Toc113543602)

[2.1.1 Lighting 6](#_Toc113543603)

[2.1.2 Signs 7](#_Toc113543604)

[2.1.3 Structural Works 8](#_Toc113543605)

[2.1.4 Bollards 8](#_Toc113543606)

[2.1.5 Outdoor Dining 9](#_Toc113543607)

[2.2 Traffic 9](#_Toc113543608)

[2.2.1 Silent Vehicles 9](#_Toc113543609)

[2.2.2 Personal Mobility Devices (e-riders) 10](#_Toc113543610)

[2.2.3 Small-wheeled devices (bicycles, skateboards, etc.) 11](#_Toc113543611)

[2.2.4 Delivery and Construction Vehicles 12](#_Toc113543612)

[2.3 Surfaces 12](#_Toc113543613)

[2.3.1 Footpaths and Pedestrian Clearways 12](#_Toc113543614)

[2.3.2 Steps and Tactile Indicators 13](#_Toc113543615)

[2.4 Interaction with Roads 14](#_Toc113543616)

[2.4.1 Ramps and Crossings 14](#_Toc113543617)

[2.4.2 Roundabouts 15](#_Toc113543618)

[2.4.3 Shared Paths 15](#_Toc113543619)

[2.4.4 Shared Zones 16](#_Toc113543620)

[2.5 Other Hazards 17](#_Toc113543621)

[2.5.1 Unrestrained Dogs 17](#_Toc113543622)

[2.5.2 Private Use of Public Areas 17](#_Toc113543623)

[3. Underpinning Policy Frameworks 18](#_Toc113543624)

[4. Glossary of key terms 18](#_Toc113543625)

## About Blind Citizens Australia

Blind Citizens Australia (BCA) is the peak national representative organisation of and for the over 500,000 people in Australia who are blind or vision impaired. For nearly 50 years, BCA has built a strong reputation for empowering Australians who are blind or vision impaired to lead full and active lives and to make meaningful contributions to our communities.

BCA provides peer support and individual advocacy to people who are blind or vision impaired across Australia. Through our campaign work, we address systemic barriers by promoting the full and equal participation in society of people who are blind or vision impaired. Through our policy work, we provide advice to community and governments on issues of importance to people who are blind or vision impaired. As a disability-led organisation, our work is directly informed by lived experience.

All directors are full members of BCA and the majority of our volunteers and staff are blind or vision impaired. They are of diverse backgrounds and identities.

## About Australians who are blind, or vision impaired

There are currently more than 500,000 people who are blind or vision impaired in Australia with estimates that this will rise to 564,000 by 2030. According to Vision Initiative, around 80% of vision loss in Australia is caused by conditions that become more common as people age[[1]](#footnote-1).

Australians who are blind or vision impaired can live rich and active lives and make meaningful contributions to their communities: working, volunteering, raising families and engaging in sports and other recreational activities. The extent to which people can actively and independently participate in community life does, however, rely on facilities, services and systems that are available to the public being designed in a way that makes them inclusive of the needs of all citizens – including those who are blind or vision impaired.

## 1. Purpose of this policy

### 1.1 What the policy is about

This policy explores the concerns of our members that the environment through which we walk is becoming increasingly cluttered and less easy to negotiate safely. This is the first major update of BCA’s Pedestrian Safety Policy since 2009. In the intervening years, the pedestrian environment has changed dramatically. New technology has enabled the rapid rise of Personal Mobility Devices (including e-scooters, segways, hoverboards etc). The ongoing threat of terror attacks making use of vehicles has led to the installation of heavy concrete bollards across major pedestrian thoroughfares. Even the Covid-19 Pandemic has had an impact on pedestrian safety. In many states, cafes and restaurants have been given additional rights to use footpaths for outdoor dining, which has disproportionately impacted pedestrians who are blind or vision impaired by reducing the space available to walk and increasing the concentration of hazards.

Pedestrian safety hazards are found throughout the community and come in a variety of types, shapes, and sizes. Hazards can be stationary, including items such as overhanging shop signs; awnings and displays of goods for sale; or tables, chairs, benches potted plants and trees. They can be mobile, such as delivery and construction vehicles; unrestrained dogs; or street artists (including painters or buskers) and vendors selling merchandise or food. Some hazards are temporary in nature like advertising ‘A Frame’ boards, construction barricades, objects dropped or left on the footpath, or protruding items, equipment and supplies hanging off cars. Others create long term barriers for members of the community – such as overhanging branches, broken footpaths and merged kerbs, or poles and bollards (especially when grouped together). Hazards can be the result of an object impeding a pedestrian who is blind or vision impaired, such as a trolley or a bicycle left on the footpath, or a tree root growing through it making the surface uneven; or by the lack of appropriate pedestrian infrastructure – such as streetlights, tactile ground surface indicators (TGSIs), or paths suddenly end with no clear continuing way of access.

In short, for many people who are blind or vision impaired, the very act of leaving their house to access their community is made challenging by the hazards in their local areas and beyond. These challenges are even greater for people with vision impairment or blindness with other disabilities – especially hearing loss – which can further challenge their interpretation of the environment.

### 1.2 How the policy was developed

The policy has been developed in conjunction with BCA's National Policy Council, and informed by extensive consultation with BCA members. Consultations were framed around hazards in commercial spaces, around residential areas, and those relating to road infrastructure, as well as a dedicated session on the increasing use of e-scooters and other personal mobility devices (PMDs).

BCA has also been involved with individual and systemic advocacy relating to pedestrian safety hazards for numerous years.

### 1.3 How the Policy should be used

In recent years, governments across Australia have taken steps to improve the lives and experiences of the over 4.4 million Australians (roughly 1 in every 5 Australians) who have some form of disability[[2]](#endnote-1). As a signatory to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), governments in Australia have an obligation to continue to monitor and eliminate pedestrian safety hazards to ensure the wellbeing of people with disability. In particular, ‘Article 9 – Accessibility’ requires State Parties to take appropriate measures to ensure that people with disability have equal access to the physical environment in both urban and rural areas, and requires the “identification and elimination of obstacles and barriers to accessibility”[[3]](#endnote-2).

The new Australian Disability Strategy 2021 – 2031 rightly acknowledges the importance of having a community that is accessible and inclusive and notes that areas that are not, “exclude people with disability from participation in work, education, and social and cultural life” [[4]](#endnote-3). In both New South Wales and South Australia previous outdated disability legislation have been replaced with Disability Inclusion Acts, and in Victoria the updated Disability Act and related Disability Plan is likely to have a strong focus on the importance of Universal Design. In addition, most State and Territory Governments now have requirements for Local Councils to develop Disability Action and Inclusion Plans (DAIPs).

However, while many of these action plans have strong commitments in terms of improving accessibility in the community, it is clear that much more practical work needs to be done to make these commitments a reality. In order to support the work being done by all levels of government to ensure that “the built and natural environment is accessible” (Policy Priority 4 of the Australian Disability Strategy 2021 - 2031), this policy identifies some of the major hazards and barriers to safety encountered by people who are blind or vision impaired when in the course of their day to day lives and makes recommendations that we believe will make significant improvements to their safety.

Through the release of this Policy Statement, we seek to work with Local, State/Territory and the Commonwealth Government, as well as peak bodies, relevant statutory agencies and any other relevant organisation to implement solutions to the problems caused by our obstacle-ridden environment through community education, new regulations and improved administration of existing laws. The policy can be used to support advocacy by BCA staff and members by providing information about best practice in designing safe and accessible public spaces.

This policy will be made available on the BCA website and distributed to relevant organisations including state road traffic authorities and all local councils around Australia.

## 2. Statement of principles

### 2.1 Hazards in the Community

#### 2.1.1 Lighting

Ensuring adequate street lighting is a simple but effective way to improve accessibility. In consultation with members, we heard that the most common issues related to lighting are to do with glare, with low light, and with the consistency of light provided. Members explained that “[there are] days where my vision is good in the morning, [but] bad at night”, meaning that without appropriate illumination, footpaths and other walking areas that may be accessible during the day become dangerous at night.

We also heard that advertising signage with LED lighting, especially those that produce flashing ‘strobe’ effects – such as those found outside petrol stations, fish and chip shops, other fast food restaurants – can be disorienting for people who are blind or vision impaired.

To fix this, the lighting of streets and pedestrian open spaces must be sufficient to ensure that the surrounding environment, traffic and other obstacles are clearly visible to people who are vision impaired. This will also have a flow on benefit to the general community by increasing public safety.

It is crucial that when installing streetlights, consideration is given to the type of light that will be cast – many streetlights are too dull to be of help, while a strong and focused source of light can be unhelpful, even disorienting. Strong, focused light can also exacerbate glare sensitivity for people who are vision impaired with eye conditions causing photophobia. An even spread of light is crucial to ensure people who are vision impaired get the full benefit.

It is also important that local governments and road authorities tasked with the installation and maintenance of street lighting ensure all lights are kept in good working order, and that nearby trees are regularly trimmed back to ensure they do not impede the light cast.

#### 2.1.2 Signs

It is time for state and territory based regulations to be updated to provide that street, parking, traffic, bus stop, taxi and building signs are as clear, and as safe as possible. In order to ensure pedestrian safety, signs must have clear lettering which is as large as possible, have a colour contrasting background, be made of non-reflecting materials, and be clearly illuminated by direct lighting. Further, to improve pedestrian safety, signs must not have rough or sharp edges and should be constructed of materials which will minimise the possibility of injury.

Signs should be positioned to enable a person who is vision impaired to get close enough to them to read the information, while also high enough that a person who is blind will not be at risk of a collision. In a consultation with members, it was agreed that where a sign is attached to a wall or fence it should be placed at eye level to ensure people who are vision impaired can access it; but signs that are free standing or attached to narrow poles must be positioned higher up (approximately 2m) above the walking surface. Moving or rotating signs should not be permitted in the clear logical path of travel of pedestrians.

Creating truly accessible public spaces also requires braille and tactile markings to be included wherever a street sign is placed. It is crucial that the braille or tactile markings are not obscured by any doors or other objects, and that they are placed at a height level appropriate for someone standing in front to be able to reach and read it. Examples of local governments that have been leading the way in this area include the City of Sydney and the Brisbane City Council. In Sydney there are tactile and braille signs placed next to push buttons “at every signalised pedestrian crossing” in the area[[5]](#endnote-4); while Brisbane has established the ‘braille trail’ along with more than 520 tactile street signs across the CBD and beyond[[6]](#endnote-5).

#### 2.1.3 Structural Works

Construction sites and other structural works frequently result in significant pedestrian safety hazards. It is clear from feedback from members that regulations that govern such work must be updated to ensure the highest level of safety. These regulations should require that open access holes and trenches, dug as part of street work, be guarded by firmly fenced and properly maintained barricades, extending from ground level to a height of at least 1.5 metres and that these barricades be suitably coloured to contrast with their surroundings and be adequately lit at night. These barricades should be constructed in such a way that a white cane will not normally pass underneath.

All construction and structural works be clearly and appropriately marked with signs indicating ‘work ahead’ or ‘hazard’. These signs must be positioned clear of the footpath by enough margin that pedestrians will not risk walking into them. It is crucial that if areas are roped off, appropriate thick, brightly coloured (ideally orange) tape is used. Members agreed that the thin white tape that is often used is difficult to perceive. If an alternative route of travel is required for pedestrians it must be clearly marked out, and must comply with these same principles. This is especially important if it leads pedestrians onto the road, e.g. if a construction truck is parked across the full width of a footpath and verge, or significant work is being done to the footpath itself.

We also believe it is vital that laws prohibiting the dumping of loads of soil, sand, bricks and construction rubble on footpaths be strictly enforced.

#### 2.1.4 Bollards

In the aftermath of the mass casualty attack in Bourke Street, Melbourne in January 2017, the City of Melbourne began installation of metal and concrete bollards around major pedestrian thoroughfares. After a series of terror attacks across the UK and Europe that also involved cars or vans being deliberately crashed into pedestrian areas, this measure was rapidly expanded and other capital cities around Australia quickly introduced similar style bollards.

While we strongly welcome the commitment to pedestrian safety these bollards represent, in feedback from members it is clear that more could be done to improve their design that would reduce the risk of them creating a further hazard to pedestrians who are blind or vision impaired.

Safety bollards must be easily identifiable and distinguishable against from the background environment. In line with international standards, they should incorporate a band that contrasts in colour and luminance with the remainder of the bollard[[7]](#endnote-6). The band should be a minimum depth of 150mm, placed with the lower edge of the band between 1400mm and 1600mm above ground level. Further, whilst incorporating colour contrasted bands will help improve the visibility of bollards to some extent, the choice of colour for the overall post or bollard also has an impact. We heard from members that concrete blocks and metal grey poles are particularly problematic as they tend to blend into a paved background. Instead, bollards and posts should be painted a bright orange, which members agreed would be the most likely to be visible against the background of a street.

#### 2.1.5 Outdoor Dining

The Covid-19 pandemic has also left its mark on pedestrian safety, with many restaurants and cafes being supported through government funding to increase their use of outdoor dining.

While this is an understandable response to help minimise the risk of exposure to the virus, the encroachment of tables and chairs – along with large items such as pot plants and heaters – into the public space has created additional risks to the safety of people who are blind or vision impaired.

During our consultations, BCA members highlighted the importance of a clear line of travel next to walls and shopfronts. This is covered further below in ‘Section 2.3.1 – Footpaths and Pedestrian Clearways’.

### 2.2 Traffic

#### 2.2.1 Silent Vehicles

In recent years, silent or near-silent vehicles such as hybrid electric cars and motorbikes have become more commonplace. Their popularity has grown along with increased public concern regarding climate change and fuel scarcity. It is expected that usage of silent vehicles will continue to flourish.

This trend is of great concern to people who are blind or vision impaired around the world because it increases the safety hazards already present in pedestrian travel. For those who may also have hearing loss, this risk becomes even greater. As noted by Robert Wall Emerson, from the Western Michigan University:

“Historically, one of the main sources of useful information for a person relying on sound for navigation in an urban setting was the flow of traffic. Traffic flow can tell a person whether a street is one way or two way, how wide a street is, how close a person is to an intersection, and how close a person is to the street. All of these bits of information, combined with knowledge of how a city is laid out, allows a person to determine approximately where they are and perhaps even what direction they are walking.”[[8]](#endnote-7)

This information has been used by people who are blind or vision impaired for decades, with specific skills and knowledge developed and taught by orientation and mobility specialists to help take advantage of that traffic flow information. But as electric and hybrid vehicles grow in popularity, and a greater proportion of traffic consists of silent vehicles, much of this vital navigational information will be lost, while the risks of serious injury (or worse) for people who are blind or vision impaired will continue to rise.

The long term solution is for federal and state governments to take a strict approach to the regulation of minimum noise emissions from hybrid and electric vehicles to maximise the safety of pedestrians who are blind, deafblind or vision impaired. This would involve Australia becoming a signatory to UN regulation 183-01 relating to silent vehicles; and would include mandating the installation of an Acoustic Vehicle Alerting System (AVAS) in all electric and hybrid vehicles registered in Australia and working with offshore car manufacturers for the Australian market to ensure that AVAS is installed without an off-switch (as per UN regulation 138-01).

The immediate solution is for a public education campaign for drivers of silent vehicles to ensure their awareness of the dangers of their vehicles to pedestrians and of the need to keep a particular look out for pedestrians.

#### 2.2.2 Personal Mobility Devices (e-riders)

There has been a significant uptake of e-scooters and other personal mobility devices (PMDs), also known as ‘e-ridables’ by the public in recent years, with legislation and regulation struggling to keep up. PMDs refers to a wide range of electric powered devices including e-scooters, electric unicycles, electric skateboards, electric roller skates, one-wheel electric scooters and hoverboards.

Blind Citizens Australia (BCA) recognises the ongoing role e-scooters are likely to play as a way of providing a practical, ecological and economical alternative to city traffic, and as “last-mile” vehicles to help bridge connections with public transport. However, these devices pose significant risks to people who are blind or vision impaired – running almost silently and capable of speeds of at least 25km/h. We are gravely concerned by reports of some e-scooters available on the market that can reach speeds of up to 90 km/h.

It is crucial that governments across Australia introduce consistent rules regulating their use to promote the safety of both users and pedestrians. The uptake of e-scooters and e-bikes has been dictated by the legal position in the various States and Territories (see ‘Environmental Scan of e-scooters and other Personal Mobility Devices in Australia’). Some state and territory governments – such as Tasmania and the ACT – have given open support to private ownership of these devices, while other jurisdictions – such as Victoria and South Australia – have encouraged companies to establish schemes where e-scooters and e-bikes can be hired as a way for tourists and locals to get around (‘hire and ride schemes’).

When used inappropriately, PMDs create a significant safety hazard for pedestrians who are blind or vision impaired. Foremost of those concerns is the difficulty detecting e-scooters approaching from behind due to the quiet approach while at high speeds (up to 25 km/hr). In addition, ‘hire and ride’ devices are often deposited across pedestrian areas after being used, creating a tripping or collision hazard for people who are blind or vision impaired. Similarly, these devices may be left in areas that block tactile guidance systems, traffic lights, or walls that are essential for the independent mobility of people who are blind or vision impaired.

We note that the National Transport Commission, the statutory body for developing road regulations, released a 73-page Final Report in August 2020 after spending 18 months considering the barriers to the safe use of PMDs. The report recommended e-scooters be allowed for use at speeds of 10km/h on footpaths and shared zones, and 25km/h on bicycle paths and residential streets (roads with speed limits of 50km/h or less). BCA broadly supports the recommendations of this report; however, we go further and urge all jurisdictions to ban PMDs (as well as bicycles and other small wheeled devices – see Section 2.2.3) from use on footpaths.

#### 2.2.3 Small-wheeled devices (bicycles, skateboards, etc.)

It is clear that Australia’s road traffic laws need to be updated to provide consistency between states and territories. One glaring example of inconsistency in these laws is around the way cyclists are allowed to interact with footpaths. We believe it is clear that bicycles and other ‘small-wheeled devices’ (skateboards, roller-skates/blades, non-powered scooters) pose an unacceptable risk to pedestrians on regular footpaths, and should be prohibited for anyone over the age of 12 years except for in designated Shared Paths (see Section 2.4.3).

This is currently the case in NSW and Victoria, but all other states and territories allow bikes to be ridden on footpaths. In order to provide consistency, clarity and safety, the other states and territories should update their laws so that cyclists are required to ride on the road, in the lane nearest the kerb, or in designated bicycle lanes or shared paths.

Local councils should do more to provide bicycle racks in order to reduce the incidence of bicycles being chained to signs or poles, and the subsequent risk they will jut out into the path creating a hazard for pedestrians. These racks should be painted in contrasting colours to help their visibility and should be located on the kerbside.

Laws regulating users of bikes, skate boards and roller blades should be strictly enforced, particularly in pedestrian clearways and areas of heavy pedestrian use.

#### 2.2.4 Delivery and Construction Vehicles

Access and manoeuvring for service, construction and delivery vehicles should be separated from pedestrian access ways wherever possible. Where this is not possible, clear signage and warning TGSIs are crucial to inform pedestrians who are blind or vision impaired of the potential hazard.

Clear visibility is required where-ever possible for vehicles coming in and out of loading bays and construction sites. If clear visibility cannot be achieved, there should be signs warning drivers to watch out for pedestrians, as well as appropriate and accessible warnings for pedestrians in the area.

During the consultation for this policy, we heard from members that even where delivery or construction vehicles were parked off the footpath in an appropriate bay, hazards also arise from vehicles with overhanging loads (such as beams or planks etc). All levels of government must ensure that when engaging tradespeople for construction it is appropriately communicated that overhanging loads must not impede the pedestrian clearway, and local authorities must enforce this.

### 2.3 Surfaces

#### 2.3.1 Footpaths and Pedestrian Clearways

To the maximum extent possible, walking surfaces should be a determined, consistent and predictable level. For people who use shorelining as a mobility strategy, a clear and logical path of travel is best achieved by providing clear space next to a wall or shopfronts. Where they are not already in place, regulations should be introduced to provide for a "pedestrian clearway" on footpaths and in public open space, with a minimum of two metres width of clear logical path of travel reserved for pedestrians which is obstacle free. As part of this, Road Traffic Rules should prohibit the driving and parking of motor vehicles and motorcycles on footpaths and the parking of motor vehicles and motorcycles within nine metres of a pedestrian crossing. Adequate, and clearly signed street parking should be provided for motorcycles.

In addition, pram ramps (or kerb ramps as they are now known) must line up with the path in a logical manner, this is covered further below in ‘Section 2.4.1 – Ramps and Crossings’.

It is also important that all local governments and responsible authorities must have a footpath maintenance program. In consultation with members, we heard that frequently encountered hazards relating to footpaths includes drop offs into gutters or storm drains, which can constitute a significant fall hazard; as well as footpaths that come to an abrupt end, seemingly directing pedestrians onto grassy areas or worse – a road.

We also encourage stronger enforcement of laws prohibiting the obstruction of footpaths by overhanging trees and branches, and regular inspections should be undertaken in areas known for broken footpaths caused by tree roots.

#### 2.3.2 Steps and Tactile Indicators

Where steps are necessary, the edge of each step should be marked with colour contrasting strips (yellow or white), that enables people who are vision impaired to identify there are stairs present even when they may have limited or no depth perception. Similarly, colour contrasted handrails should be features of all flights of stairs, and these should be well lit. In addition, tactile ground surface indicators (TGSIs) in suitably contrasting colours must be placed at the tops and bottoms of flights of stairs to provide people who are blind or vision impaired with appropriate warning of an upcoming hazard.

It is important to note that there are two types of tactile indicators: hazard or warning indicators, which are truncated domes having a sloped side to allow for a tactile indication of a hazard that is immediately adjacent to the direction of travel; and directional indicators which act as a guide to indicate that there is a safe route parallel to the direction of travel. The warning indicators can be installed as individual units, or in a tile with multiple ‘bumps’. While the appropriate use of TGSIs is mandated in the Building Code of Australia and the Australian Disability Discrimination Act, during our consultation with members, we heard feedback that the indicators are sometimes used interchangeably by councils and authorities who do not understand their intended purpose. Members also clearly indicated their preference for warning indicators to be bright yellow to provide a better contrast and greater visibility for people who are vision impaired, rather than the metallic silver indicators that are often chosen for their aesthetic but are harder to see against a concrete floor.

We have also been encouraged by the project that has been funded by Victoria’s Transport Accident Commission (TAC) to incorporate LED safety lights into the TGSIs at the intersection of Swanston Street and Little Collins Street in central Melbourne. The footpath pavement lights change colour with the traffic lights, giving pedestrians a clear visual signal about whether they should stop or go[[9]](#endnote-8).

### 2.4 Interaction with Roads

#### 2.4.1 Ramps and Crossings

Kerb ramps (previously known as pram ramps) at corners and pedestrian crossings can present a hazard to pedestrians who are blind or vision impaired, if they are not designed and installed correctly. All kerb ramps must have a sufficient slope to be detectable under foot and should not merge into the road, and wide enough to allow the passage of a pram or wheelchair. Kerb ramps must be positioned appropriately, with a kerb edge beside each ramp to enable a person who is blind to line up with a gutter before crossing a road; under no circumstances should a pram ramp, due to its angle, direct pedestrians into the path of oncoming traffic.

It is also crucial that all traffic crossings be marked with audible/tactile traffic signals

During our consultation sessions, members agreed that zebra crossings should not be considered safe or accessible for people who are blind or vision impaired. We heard that drivers can not be relied upon to stop at zebra crossings the same way they would at a red light, and that with the increasing number of quiet or silent vehicles on the road, people who are blind or vision impaired sometimes find it challenging to know when it is safe too cross. Wherever possible the installation of audible traffic signals should be considered over zebra crossings, and where zebra crossings do exist, it is vital they are installed with clear line markings and using appropriate colour contrasting and TGSIs should be used to mark the edges of crossings.

Local councils and roads authorities must also ensure that the adequate and appropriate working of all audible/tactile traffic signals in their area, and that repairs are conducted quickly and with the highest priority. It is also important that the processes to report faults or issues for repairs are clear and transparent, as some members shared that it was only after they were shown by an Orientation and Mobility Instructor that they knew they could make such a report. This must also be the case for all pedestrian crossing buttons. We have also heard reports of the volume of audible/tactile crossing signals being ‘turned down’ at certain times of the day or night. Given the impact this can have on the ability of pedestrians who are blind, vision impaired and/or hard of hearing, this practice should be prohibited in national road safety laws.

#### 2.4.2 Roundabouts

Roundabouts are an urban design paradox. As a pure traffic engineering intersection solution, roundabouts generally reduce hazards for motor vehicles and have less delay than traffic lights or priority intersections. But the traditional roundabout design offers little for cyclists or pedestrians.

Unlike most intersections, where pedestrians generally have right of way (whether or not this is observed), vehicles have right of way over pedestrians at roundabouts. This can make it very difficult, if not dangerous, for pedestrians to cross. Many pedestrians who are blind or vision impaired find it safer to cross intersections that are controlled by audible/tactile traffic signals, and road authorities and councils should ensure that there is a clear, safe alternative route of travel for pedestrians in areas with roundabouts, located a reasonable distance from the main crossing; or provide audible and tactile traffic signals as part of the roundabout infrastructure.

#### 2.4.3 Shared Paths

As noted in Section 2.2.3, many states and territories currently allow bikes, skateboards and other small-wheeled devices on the footpath, and more recently that has extended to e-rideables as well; however, in NSW and Victoria this is forbidden except in areas specifically marked as a Shared Path (not to be confused with a Shared Zone – see 2.4.4). These shared paths are by a sign on a post at the beginning of the area with an image of a stick figure person and a bicycle underneath. The path itself resembles a single lane, two-way road, with white dotted lines painted in the centre to mark out the left and right hand side.

During the consultation for this policy, it was clear that members did not oppose the concept of a designated shared path – in fact some members noted that it may help reinforce the idea that if a footpath is not specifically signed as shared, then the default position is that bikes are not permitted. Members did agree that clear standards of behaviour for use on these paths must be regulated, communicated, and enforced.

For shared paths to be safe, bicycles, skateboarders, roller-bladers, e-bike and e-scooter riders must be required to give way to all pedestrians, and to signal their intentions to pass pedestrians either verbally (with a clear statement such as “passing on your right”) or with an easily audible bell. While this is already a requirement in most jurisdictions, members agreed it is one that is rarely observed. More community education on shared path use would be useful to help communicate why this communication is crucial for the safety of pedestrians who are blind or vision impaired.

The start of a shared path must also be clearly marked. The sign indicating the start of the shared path must be paired with an appropriately placed braille or tactile indicator, in line with this policy’s position on signs (see Section 2.1.2).

#### 2.4.4 Shared Zones

Unlike shared paths, shared zones (also known as shared spaces or merged kerbs) are areas where the road surface is at the same level as the footpath level (with no grade separation). Shared zones are sometimes used in tourist or shopping areas, and are particularly common in the Australian Capital Territory (ACT) such as in Bunda Street in the Civic Centre, close to the Canberra Blind Society.

Shared zones were born from an urban design theory that by taking away common elements of road design – such as kerbs, road surface markings, traffic signs and traffic lights – and creating a greater sense of uncertainty, drivers are likely to reduce their speed and be guided by “natural human interactions” such as eye contact, rather than artificial regulations. However, it is clear that this theory is fundamentally flawed and shows a distinct lack of awareness of the needs of pedestrians who are blind or vision impaired. Shared zones are dangerous to pedestrians who are blind or vision impaired, as they are unable to see and respond to the non-verbal communication between drivers, riders and pedestrians that is central to the shared zone context. Some pedestrians may not even be aware when a footpath becomes part of the road surface.

It is important to note that in the United Kingdom (UK) the Department for Transport issued national guidance in 2011 encouraging the use of shared zones, but in 2018 reversed its position and has instructed local authorities to halt all new shared zone constructions. Explaining the change of policy, the UK Transport Minister stated that shared zones “just don’t work” for people who are blind or vision impaired[[10]](#endnote-9).

Australia should now follow this step. If states and territory governments are serious about their commitments under the Australian Disability Strategy to adopting universal design, action should be taken immediately to begin the phasing out of all shared zones. In locations where this is likely to take significant time and resources, we encourage local councils and road authorities to install TGSIs at all entrance points to shared zones, to ensure pedestrians who are blind or vision impaired are aware they are entering such an area.

### 2.5 Other Hazards

#### 2.5.1 Unrestrained Dogs

Unrestrained dogs can present dangers to all pedestrians, but especially to pedestrians who are blind or vision impaired; and this risk is increased even further for people who use dog guides. Unrestrained dogs are a threat not only to the individual person, but can also be both a distraction to and a danger to the dog guide which is used for mobility guidance. Every year in Australia a significant number of dog guides are attacked by other dogs, and those who are injured or traumatised may be prevented from working with their handler while they heal.

Blind Citizens Australia calls on all levels of government to more actively enforce existing laws applying to unrestrained dogs. Governments should also become much more active in prosecuting owners of unrestrained dogs that attack and injure dog guides. We note that under the NDIS Price Guide, the inclusion of a dog guide is worth approximately $50,000; while we recognise this may be unrealistic to set as a penalty, we believe it provides a reasonable indication of the financial impact caused by an unruly and unrestrained dog.

#### 2.5.2 Private Use of Public Areas

Familiarity and consistency in the physical environment is important for people who are blind or vision impaired to be able to independently navigate their local areas. During member consultations, we heard feedback about the uncertainty and confusion that can occur when public areas are used for private purposes. This includes the use of a public park for weddings or other similar celebrations, but also extends to the transformation of public areas during major events such as parades and festivals.

It is important that advance notice is provided when public areas are being used for private purposes so that people who may normally use these areas have forewarning and can plan accordingly. It is also crucial that during such events, pathways are kept clear, with local council officers on site to enforce this.

## 3. Underpinning Policy Frameworks

The key legal and regulatory frameworks that underpin the Pedestrian Safety Policy include:

1. Disability Discrimination Act 1992
2. United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). Particularly Article 9 – Accessibility; and Article 20 – Personal Mobility
3. Australia’s Disability Strategy 2021 – 2031
4. Disability Standards in Accessible Public Transport (DSAPT)
5. State/Territory Government Disability Acts and Plans

## 4. Glossary of key terms

**Assistive technology -** any device, program, software, app, or mobility aid which assists a person with a disability to be able to undertake a function that they cannot do without the technology.

**Braille -** a language system, which is tactile, consisting of formations using 6 tactile dots which are used to spell letters or contractions. There are also braille codes which enable braille readers to use mathematical and scientific symbols and read and write music notation. Braille can be accessed via embossed documents, or refreshable braille displays.

**Codesign -** a method of designing which includes a diverse group of people, e.g., including people with disabilities alongside the organisation or company that is developing a new project or product, or as a significant consultant in a new or revised policy.

**Orientation and mobility (O&M) -** location or position of a person in a physical space (orientation) and that person's movement within that physical space (mobility).

**Personal Mobility Devices (PMDs) -** a wide range of electric powered devices including e-scooters, electric unicycles, electric skateboards, electric roller skates, one-wheel electric scooters and hoverboards.

**Shorelining -** following a wall, kerb, hedge or other contrasting surface to the one a person is walking on in order to maintain a specific orientation while travelling. Shorelining allows a person to arc their cane either by constant contact or two-point touch technique to cross an open space or travel towards a known point.

**Tactile Ground Surface Indicators (TGSIs) -** tactile markers, usually solid circles or rectangles on the ground which indicate direction, or an upcoming hazard, such as stairs, for a person who is blind, or vision impaired. Standard AS1428.4 outlines standards for ground surface indicators for the orientation of people who are blind and should be adhered to wherever this Policy Statement recommends tactile surfaces

**Website Content Accessibility Guidelines (WCAG) 2.1 (or the latest version) -** the guide which sets out the standard for compliance with accessibility for all website content on websites on the internet.

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2. Australian Network on Disability. Disability statistics. <https://www.and.org.au/pages/disability-statistics.html> [↑](#endnote-ref-1)
3. United Nations. Convention on the Rights of Persons with Disabilities – Article 9. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html> [↑](#endnote-ref-2)
4. Australia’s Disability Strategy 2021-2031. Inclusive Homes and Communities. <https://www.disabilitygateway.gov.au/sites/default/files/documents/2021-11/1786-australias-disability.pdf> [↑](#endnote-ref-3)
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6. Brisbane City Council. Accessible Streets and Footpaths. <https://www.brisbane.qld.gov.au/community-and-safety/community-support/disability-access-and-inclusion/streets-footpaths> [↑](#endnote-ref-5)
7. Gov.UK. Inclusive Mobility. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3695/inclusive-mobility.pdf> [↑](#endnote-ref-6)
8. Robert Wall Emerson. Outdoor Wayfinding and Navigation for People Who Are Blind: Accessing the Built Environment. <https://www.researchgate.net/publication/317235871_Outdoor_Wayfinding_and_Navigation_for_People_Who_Are_Blind_Accessing_the_Built_Environment> [↑](#endnote-ref-7)
9. Vivacity LED Tactiles installed on Swanston Street in Melbourne. <https://smarterlite.com/led-tactiles/> [↑](#endnote-ref-8)
10. BBC News. ‘Shared’ road schemes paused over dangers to blind people. <https://www.bbc.com/news/uk-england-44971392> [↑](#endnote-ref-9)