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Submission

Roads Act 1993

Submitted by

Guide Dogs NSW/ACT

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About us

At Guide Dogs NSW/ACT, our vision is to create a world that is inclusive and accessible for everyone with low vision or blindness. We believe that advocacy and education are essential to breaking down barriers and creating a welcoming society. For more than 65 years, we have supported people with low vision or blindness to navigate their communities safely and independently. We are proud to be the leading provider of Guide Dogs and Orientation and Mobility services in NSW and the ACT.

Summary

We commend the initiative to review the Roads Act 1993 and appreciate the opportunity to provide feedback. Our submission emphasises key areas requiring attention to ensure safe, accessible, and inclusive road and street designs for people who are blind or have low vision. Recent research highlights significant concerns related to urban design challenges, including road crossings, which, when combined with increased cognitive load, create substantial barriers for people who are blind or have low vision in navigating their communities.

Research

Guide Dogs Australia conducted research through EY Sweeney in 2023 to better understand the needs of people around Australia with low vision or blindness which included footpath and urban design challenges.

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Results indicated an extraordinarily strong narrative that people with low vision or blindness face numerous challenges in public places, which impacts their confidence and ability to access and participate in their community.

Respondents stated that if urban design was improved and if awareness of their challenges were enhanced through community education, many of their issues would be mitigated.

A focus group, commissioned by the City of Sydney, comprising participants who are blind or have low vision, was conducted at the end of last year. All participants reported that the current design of raised crossings and continuous footpaths highlighted the following concerns:

- Difficulty distinguishing between footpath and road
- Elevated risk of veering
- Difficulty walking in a straight line
- Disorientation
- Anxiety and uncertainty
- Cognitive fatigue
- Significant safety concerns

The above research challenges the notion that a "connected, liveable, and responsive environment" can be achieved without enhanced design that prioritises the safety of people who are blind or have low vision, while also addressing their community needs.

The Issues

Footpaths

- **Current and emerging issues:** The 2023 Guide Dogs Australia survey revealed that 96% respondents had experienced footpath issues in the last two years. Respondents reported that micro mobility (e-scooters, e-bikes),

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shared paths, shared roads and crowd protection barriers were the new emerging hazardous footpath issues.

- **Clear path of travel:** Footpaths are being used for more than just space for walking. We strongly advocate for a clear path of travel along the building line as well as supporting the need for sufficient space for people to be able to walk comfortably and safely. Footpaths should also be free from obstructions like outdoor dining, street furniture, and goods displays. Consistent tactile cues should be provided to aid navigation.
- **Safety is paramount:** Safety of the pedestrian on a footpath should always be front and centre, especially for people who are blind or have low vision, to promote independent dignified travel, safety, confidence and inclusion.
- **Our footpaths are becoming more complex and dynamic:** Pedestrians are becoming more distracted due to the use of devices. Competition for the footpath is increasing with not only outdoor dining but also the rapid uptake of micro-mobility.
- **Micro-mobility devices:** Hazards posed by micro-mobility devices (e-scooters, e-bikes) and shared paths by implementing dedicated lanes and clear, tactile, and visual markings need to be prioritised.
- **Shared zones:** Urban design is increasingly trending towards shared zones, where footpaths and carriageways are blending into a seamless, continuous zone.

Road crossings

- **At-grade/raised intersections:** These types of crossings, including continuous footpaths were reported as being extremely hazardous for people who are blind or have low vision due to the lack of safe navigational clues and landmarks.
- **Flush finish intersections:** Focus group participants reported that flush finish intersections reduce their confidence and safety, while conversely increasing their anxiety and stress. Intersections such as George Street, Sydney CBD and Church Street, Parramatta are extremely hazardous for people who are blind or have low vision. Participants expressed avoidance behaviours, stating that they no longer feel confident or safe navigating these

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areas independently. This design is negatively impacting their ability to participate in the community.

- **Distinct tactile and visual cues:** Both research and focus group participants highlighted that new urban design crossings lacking adequate tactile cues have been reported as highly hazardous. Distinct tactile and visual cues (not TGSIs alone) should be implemented at intersections to prevent disorientation and ensure safety.

Shared roads, zones, and spaces

- **Reconsider shared zones:** Shared zones, where pedestrians and vehicles share the same space without clear segregation, pose significant safety risks for people with low vision or blindness. We suggest these should be reconsidered and alternative designs that provide clear segregation between pedestrian and vehicular areas are implemented to address feedback from the focus group about the dangers of mixed-use spaces.
- **Clear markings:** Any shared spaces should have clear, tactile, and visual markings to guide safe navigation. We strongly advocate for the use of multiple overlapping cues (tactile, visual, and auditory) to enhance safety.

Cycle ways

- **Separate cycle ways:** Cycle ways should be separate from footpaths to prevent conflicts between cyclists and pedestrians, particularly those with low vision or blindness. Physical barriers or distinct tactile features should be used to separate cycle ways from pedestrian paths.
- **Public transport stops:** Avoid designs where pedestrians must cross cycle paths to access public transport stops, as these are unsafe for individuals with low vision or blindness.

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Use of Tactile Ground Surface Indicators (TGSIs)

- Recent research clearly indicates that relying solely on TGSIs is insufficient to provide meaningful cues in areas of significant danger. Even when installed, TGSIs are not always followed or detected by people who are blind or have low vision. TGSIs should be considered as the last clue, never the **ONLY** clue.

Revision of Australian Standards

- We strongly advocate for the revision of current standards (AS 1428.4.1) to better address the needs of people with low vision or blindness in modern urban environments. Co-designed research should be conducted to update these standards.

Conclusion

“Transport infrastructure not only supports the efficient movement of people and goods but also fosters vibrant, accessible public spaces that enhance quality of life.”

Our research indicates otherwise. To truly achieve this, it is essential that these public spaces are truly accessible for people who are blind or have low vision.

The increased cognitive load and fatigue experienced by individuals with low vision or blindness when navigating poorly designed crossings and urban infrastructure, along with the psychological impacts such as anxiety and avoidance behaviours, underscore the urgent need for inclusive design.

We urge the review committee to consider these recommendations to create a safer and more inclusive environment for all road users, particularly those with low vision or blindness. We are committed to further collaboration to ensure that urban designs and technical specifications meet the needs of all pedestrians.

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