

Inquiry response

Wheels for Wellbeing

Wheels for Wellbeing is an award-winning charity that supports disabled people of all ages to enjoy the benefits of cycling. We do this by running drop-in cycling sessions across south London, with our fleet of cycles and team of dedicated instructors and volunteers. We also increasingly campaign for the recognition and removal of barriers to cycling for disabled people nationally. We organise and facilitate the Inclusive Cycling Forum (ICF), a steering group made up of disabled cyclists. The forum's aim is to discuss and develop new ideas that will lead to a more inclusive cycling culture in the UK; in turn, these are used to inform the direction of the charity's ongoing campaigns and policy work.

Inclusive cycling

Contrary to popular belief, disabled people can and do cycle. According to recent statistics published by Transport for London (TfL), as many as 15% of disabled people in London sometimes use a bike to get around (compared to 18% of non-disabled people).¹ However, many aspects of the built environment continue to prevent more disabled people from taking up cycling nationally. This is compounded by a lack of recognition for disabled cyclists: an audit of London transport plans that we conducted over this summer revealed just 2% of references made to disabled people referred to them as *cyclists*, as opposed to non-cyclists – the picture is likely to be similar across the rest of the UK.

Cycling is of benefit for disabled people in particular for the following reasons:

- **Health**: disabled people are half as likely as non-disabled people to be active,² with a higher likelihood of developing additional health conditions. Cycling offers a form of exercise and active travel that enables people to stay active in life for longer (particularly important given the UK's increasingly ageing population).
- **Social**: disabled people are more likely to be socially isolated.³ Cycling offers an enjoyable form of travel and recreation that can link up disabled people with others in their local community, such as through inclusive cycling clubs, family rides etc.
- **Environment**: many disabled people are reliant on taxis or private car hire for transport. Cycling offers an emissions-free form of transportation, whilst encouraging more people to cycle will reduce the number of cars and congestion on the road.

Moreover, designing roads, junctions and cycle-specific facilities to meet the needs of disabled cyclists also benefits non-disabled cyclists and would-be cyclists; in

¹ *Travel in London: understanding our diverse communities* (TfL, 2015), p. 223. See: <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities.pdf> (accessed 04/10/16).

² *Everybody Active, Every Day* (Public Health England, 2014), p. 11. See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/353384/Everybody_Active_Every_Day_evidence_based_approach_CONSULTATION_VERSION.pdf (accessed 04/10/16).

³ *Disability and domestic abuse* (PHE, 2015), p. 12. See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/480942/Disability_and_domestic_abuse_topic_overview_FINAL.pdf (accessed 04/10/16).

particular, parents who carry their children by cycle (often in trailers or cargo-bikes) but also children themselves, older cyclists and the rest of the general population.

Introduction

Unlike other areas (for example, buildings) the public realm is very poorly regulated for disabled people. Though there is frequent due regard for disabled pedestrians, there is often little recognition of the needs of disabled *cyclists*. For instance, we are currently unaware of any regulatory requirements surrounding the provision of dropped kerbs; adequate spacing between bollards; width of cycle paths; gradients; and surfaces – all of which are critical features for disabled cyclists, who are more likely to use non-standard and adapted cycles (such as tricycles, handcycles and recumbents). Similarly, whilst the British Standard BS 8300 and the Department for Transport's (DfT) *Inclusive Mobility* provide guidance on provision for disabled pedestrians and drivers, there is no equivalent guidance for disabled cyclists.

More positively, there are some forms of guidance, such as the London Cycling Design Standards (LCDS, 2014), that display a welcome acknowledgement of the needs of disabled cyclists. However, these are only guidelines, are not mandatory, and little observed outside of London. To make such guidance count and improve the situation for disabled cyclists everywhere, they should become enforceable standards that can be applied and adhered to nationally. Similarly, whilst we welcome the government's draft Cycling and Walking Investment Strategy (CWIS) it is important that the criteria for allocating funding linked to this programme includes a duty to meet the needs of disabled people as cyclists as well as pedestrians, in accordance with the requirements of the Public Sector Equality Duty (PSED).

1. Government policy on and current provision of accessible properties (including homes and commercial premises)

Hundreds of thousands of new homes are being built across the UK, but whilst there are regulations governing the provision of car parking for new homes (which require 10% of all new homes to have wheelchair accessible parking), there are no equivalent standards for accessible cycle parking – this is despite the fact that such parking takes up significantly less space, promotes active travel and provides healthy, safe and non-polluting travel options for a growing section of disabled people. For example, an accessible car parking bay requires an area of 3.6m x 6.0m, with a 6.0m roadway width to approach it. By contrast, an equivalent accessible *cycling* bay is 1.2m wide, 2.8m long and requires a 1.5m approach path. The argument here in favour of more accessible cycle parking is not just an issue about saving space; it is, just as importantly, about providing equity and choice for disabled people who cycle.

New offices, leisure and commercial spaces are similarly being built with little or no consideration for disabled cyclists, whether this be inclusive routes, inclusive cycle parking with step-free and easy access, or accessible showering facilities. To give a common example, there are many sports facilities (gyms, swimming pools etc.) that provide facilities for disabled people, but no parking provision for non-standard or adapted cycles. Such policies fail to see the linkages in between. On the one hand,

they recognise the need to provide good sports facilities for disabled people (and understand that disabled people can be physically active), and yet on the other fail to provide a means by which disabled people are able to reach the facility by cycle due to a lack of appropriate cycle parking. This gap in provision has arisen because Part M Vol.2 for non-dwellings (even though recently re-published) refers only to disabled drivers and accessible parking, but does not recognise disabled cyclists.

It is clear that more joined-up thinking is required. Additionally, further consultation needs to be conducted with local disability groups well in advance of planning and designing a new building or facility.

2. The effectiveness of UK legislation, policies and standards on accessibility in the built environment

The Building Regulations Part M have a section on car parking and requirements for accessible car parking and requirements for accessible car parking in all new developments, including routes from car parking to entrances. However, there is no equivalent requirement for accessible cycle parking. It is almost always assumed that a disabled person will be a driver or car passenger, or that they will be travelling by public transport /walking/pushing a wheelchair. Little or no thought is given to the idea that a disabled person might also be a cyclist.

Without proper regulations and enforcement, it is inevitable that developers will be reluctant to provide facilities for disabled cyclists. Evidence of this can be seen in cycle parking facilities that have incorporated 'double-stacker racks': not only are these difficult to use for people with poor manual strength, dexterity or standing balance, but are also totally unsuitable for non-standard cycles.

We suggest that research be carried out to develop a set of standards that will accommodate the needs of disabled cyclists better. This could include the piloting of a 'blue badge' parking scheme for disabled cyclists as a way of ensuring that cycle parking facilities are inclusive: issues surrounding practicalities, such as entitlement to and enforcement of such a scheme, could be examined, with lessons and examples drawn from the existing blue badge scheme for drivers. We would be happy to be involved in any such trial.

'Reasonable adjustments' in delivering accessibility mainly apply to existing buildings, but for new buildings provision for disabled people needs to be built in from the very start: this would prevent a situation from arising where a disabled person has to seek adaptations later on, which is not only demeaning, distressing and time-consuming for a disabled person, but is also costly to the developer. Consideration for the needs of disabled cyclists should form a key part of any process evaluating the accessibility of a new building, premises or facility.

3. Design and management of the public realm

The needs of disabled cyclists are frequently neglected in the design and management of streets, highways, parks and publicly accessible open spaces. Cycling infrastructure must be designed consistently in a way that accommodates the dimensions and requirements of non-standard cycles, such as the provision of step-free routes; sufficiently wide cycle lanes; appropriate speed reduction measures (e.g. sinusoidal, as opposed to cushioned, speed bumps – the latter can cause difficulties for cycles such as tricycles, which might be knocked off balance); and appropriate filtered permeability (e.g. ensuring ample width between bollards to allow a wider cycle to pass). Other physical barriers such as kissing gates/stiles, along with measures designed to restrict motorbike access, should also be adapted or removed when they restrict access to longer, wider or heavier cycles. Similarly, consideration should be given to the design of other speed reduction treatments, such as rumble strips, which may cause pain or discomfort for cyclists who are low to the ground (e.g. in a recumbent or on a handcycle) or unable to minimise the effects of vibrations by standing out of their saddle.

Cycles also need to be recognised as mobility aids. Many disabled people use cycling as a means of transport and active travel, but may be unable to walk or find cycling easier than walking: therefore, using a cycle as a mobility aid is a necessity for many disabled cyclists (just like many rely on the use of a wheelchair or mobility scooter for the same reason). However, under existing legislation, cycles are not recognised as such. We have received complaints from disabled cyclists who have been asked to dismount their cycle in public spaces – such as shopping precincts and train concourses – and areas marked ‘cyclists dismount’, despite explaining to staff and police officers that they are using their cycle as a mobility aid, and that without it they might be unable to balance properly, stand, or walk. Such enforcement is not only discriminatory, but actively discourages disabled people from leading more active and healthy lifestyles. Therefore, we recommend that the current ‘class 3 invalid carriage’ definition be extended to include cycles, when used by a disabled person for that purpose (as outlined in Section 2, the introduction of a blue badge scheme for disabled cyclists might provide one possible tool for ensuring appropriate recognition, identification and enforcement of such a measure).

With regard to shared spaces, we recognise that there is a potential conflict of interest between cyclists and pedestrians at bus stop bypasses/floating bus stops and bus borders. However, we maintain that such infrastructure plays an important and necessary part of ensuring the safety and security of all cyclists and that, if designed properly, such infrastructure needn’t cause an issue between pedestrians (including people with sight-loss) and cyclists. Clear markings, colouring and delineation are needed, as are appropriate surfaces. Nevertheless, we would like to see transport bodies make greater efforts to bring together disability and cycling organisations during the initial planning stages, in order to ensure that the needs of both sets of groups are met in a way that is mutually acceptable and achievable. It is

important, for example, that DfT ensures the lessons from TfL's trials of bus stop bypasses and other shared space schemes are widely disseminated and written into future design standards. Equally, it is crucial that shared solutions always be achieved where possible.

4. The role of designers, architects and built environment specialists in ensuring accessibility and inclusivity

It is imperative that Deaf and Disabled People's Organisations (DDPOs) and local disability groups are consulted during the preliminary stages of any new building development. Organising face-to-face meetings, working groups, webinars, workshops, focus groups, or online surveys and questionnaires must play an important part in this process – steps that will ensure the views and opinions of disabled residents are captured, including those of disabled cyclists.

It goes without saying that disability and equalities training should be extended/strengthened for local authority transport and cycling officers (and anyone else involved in the design and delivery of new cycling infrastructure and facilities). Proper inclusive cycling training can ensure councils have a good understanding of the needs of disabled people as cyclists, as well as an awareness of their obligation to disabled cyclists as part of the PSED and Equality Act 2010.

5. Local involvement in decision-making

As outlined above, the involvement of local DDPOs should form an integral part of any decision-making process. Ensuring that local disabled residents are aware of, and able to feed into, consultations and decisions on new building facilities is paramount.

With regard to inclusive cycling, it is critical that in the future all local authorities be obliged to specify requirements for accessible cycle parking and facilities in their area. It should become common practice for local authority cycling strategies to have dedicated sections/chapters relating to inclusive cycling, referencing how the council intends to meet the needs of disabled cyclists in their area.

This submission has the endorsement of:

