

JCMBPS response to the Clean
Neighbourhood and Environment Act 2005
A Consultation Document and the
Code Of Practice



**Joint Committee On The Mobility Of Blind And
Partially Sighted People (JCMBPS)**

Hillfields

READING

Berkshire RG7 3YG

email: jcmbps@guidedogs.org.uk

Tel: 01189 838359 Fax: 0118 983

5433/01189838206

To

DEFRA

Nobel House

17 Smith Square

London

SW1 3JR

Telephone: 0207 238 6000

Draft Guidance On The Clean Neighbourhoods And Environments Act 2005.

Response of the Joint Committee on Mobility of Blind and Partially Sighted People

Introduction

- 1.1 The Joint Committee on Mobility of Blind and Partially Sighted People (JCMBPS) welcomes the opportunity to comment.
- 1.2 The Joint Committee is an independent body consisting of representatives of the principle organisations of and for blind, deafblind and partially sighted people with a specific interest in access and mobility.
- 1.3 Figures from the 1999 DSS Research report No.94 'Disability in Great Britain' indicates there are now an estimated 1.97 million people with a significant sight loss.
- 1.4 The JCMBPS believes that blind, deafblind and partially sighted people should be able to move around safely and independently. This is currently often not the case and barriers may be physical, operational or attitudinal.
- 1.5 RNIB's research "Lost Vision – Older Visually Impaired People in the UK" found that 59% of respondents in the study never go out alone due to difficulties with moving about the pedestrian environment and in accessing public transport, and frequently consider themselves to be isolated and excluded as a consequence.
- 1.7 The RNIB has recently produced 'Travellers' Tales', (2002). Research involved qualitative surveys of the experiences of visually impaired people and showed that the poor condition of the pedestrian environment is a major factor limiting the mobility and independence of visually impaired people.
- 1.8 DPTAC, the government's advisory committee on access in transport and the built environment, recently commissioned a MORI survey into the attitudes of disabled people to public transport. The research findings show that the poor condition of the pedestrian environment was a major cause of concern to disabled people. Half (48%) of disabled people said that they would go out more if the conditions for walking were better.

- 1.9 The Joint Committee on Mobility of Blind and Partially Sighted People works with Central and Local Government, and the transport and built environment sectors, to ensure that the requirements of blind, deafblind and partially sighted people and other disabled people are understood and integrated. Policy Statements produced by JCMBPSP include the topics of walking strategies, local transport plans, concessionary fares, and taxis and private hire vehicles.

2.0 Response

We commend the Government's commitment to:

- Cleaner streets, free of litter, graffiti, and fly posting, where people feel safe and children can play without fear.
- Safer neighbourhoods free from the suffering caused by noisy neighbours and anti-social behaviour.
- Greener communities with parks that are attractive and inviting, and open spaces that are not blighted by dumped rubbish and abandoned vehicles.

- 2.1 The Joint Committee on Mobility of Blind and Partially Sighted People promotes an Inclusive Built Environment including the internal and external environment. The Joint Committee believes that the built environment must become fully and inclusively accessible in order to ensure the full and equal participation of visually impaired people and other disabled people in society.

3.0 Part 3 Nuisance Parking Offences

- 3.1 Why are changes introduced?
Some garages and businesses place cars for sale, for an extended period on the street. These cause obstructions/ potential hazards especially for blind and partially sighted people when they are parked on the pavement or corners/crossing points of streets. If the vehicle has broken down these should be recovered immediately.

4.0 Part 4 Abandoned Vehicles

- 4.1 Highlighting the importance of removing abandoned vehicles.
Welcome any action for removing vehicles parked along part of the highways especially footways and crossing along carriage ways.
- 4.2 Weighing the cost against instant removal
Cost should not be a deciding factor when it comes to removing abandoned vehicles, safety of member of the public especially people with disabilities

5.0 Part 5 Litter and Refuse

5.1 Making the complaints process available to members of the public
Local authorities and duty bodies should ensure that the information informing the public of the complaints procedure is available in alternative format

6.0 Part 6 Graffiti and other Defacements**6.1 Highlighting the effect of Graffiti in the surroundings**

Graffiti and fly posting make orientation and navigation difficult for people with a visual impairment as they diminish way finding tools within their surroundings. JCMBPS welcomes any action taken to remove and discourage it.

6.2 Qu 13 The Home Office graffiti guidance recommends that partnerships are developed between local authorities and the property owners as the preferred method for dealing with graffiti removal.

- Do you have these arrangements in place already?
 If not, are you planning to develop them

JCMBPS welcomes and agrees with the general principles of local authorities working together with others to remedy and promote good management practice. It is a well known fact that litter on the street pose as potential trip and slip hazards for people, more especially if the person has a visual or mobility impairment. JCMBPS would like to emphasise that apart from issuing control notices enforcement should be strict to prevent reoccurrences.

6.3 Qu 18 How would you describe your working relationship with owners of street furniture/educational institutions/statutory undertakers who may be affected by these powers?

- Good
 Bad
 Not sure/no contact

The dealings people with visual impairments have had in the past when local authorities or owners of premises have been contacted has been fruitless.

6.4 Qu 19 To what extent is flyposting already being dealt with alongside graffiti removal; for example, are fly-posters and graffiti routinely removed at the same time, and are anti-flyposting coatings being applied along with antigraffiti coatings?

No, it seems that graffiti takes longer to be removed.

6.5 Qu 21 Is the current guidance on graffiti useful? Are there any omissions, if so, what else needs to be included?

Yes, it is useful but enforcement should be stricter.

7.0 Part 13 Artificial lighting

- 7.1 Highlighting the importance of managing it.
Management and maintenance of uniform lighting to prevent light and dark pools along circulation routes is essential for people with a visual impairment as well as security for all.

Code of practice on Litter and Refuse

1.0 Part 1

- 1.1 Section 4
Yes we agree with the definitions and clarity for duty bodies and the public

- 1.2 Section 5 & 6

The grades and definition do provide enough clarity for duty bodies and members of the public to be able to define and interpret standards of local environmental quality.

- 1.3 Section 8

Stating that cleaning of litter is only during the day.
Duty hours should not only be during the daytime as litter is an obstruction for blind and partially sighted people who would need to be able to go out safely and hazard free in the evenings.

2.0 Part 2

- 2.1 Section 13
Standards for graffiti and fly-posting
The recommended standards for graffiti and fly-posting are useful additions to the code. When looking at it from a safe point of view, A boards are seen as potential hazards and street litter as they block footways and make the scene look very untidy. Would like A boards to be included not excluded.

- 2.2 Section 14
Making a complaint about litter and refuse – Litter Abatement Orders.
Should be available in alternative format