



A briefing for Belfast City Council - Consultation November 2023
Pavement licences: impact on people with sight loss
Guide Dogs Northern Ireland

Guide Dogs provides services that support the independence of people with sight loss in the UK. Alongside our services, we campaign to remove barriers that prevent blind and partially sighted people living their lives as they choose. Guide Dogs provides advice to public bodies including the UK Government, devolved governments and local authorities on how to create an inclusive and accessible built environment.

83% of people with sight loss said that reducing obstacles on pavements and street clutter was important to improving their quality of life¹.

Street clutter is a broad term used to classify different features on streets that become obstacles and hazards which in turn make it difficult for pedestrians with sight loss to use pavements safely and independently.

There are a number of features that are classed as street clutter: parked cars on pavements, street works, overhanging branches, wheelie bins, advertising boards (including A-boards), e-scooters, dockless bicycles, café furniture or shop displays, uneven pavement, planters, electric car charging points, unnecessary road markings, redundant traffic signs and lamp posts.

Summary of main concerns about permanent pavement café licence scheme implementation

- The move to a permanent scheme may potentially enable the rapid expansion of licences for pavement furniture, which can be difficult to navigate for disabled pedestrians, including blind and partially sighted people

¹ Insight Angels and Guide Dogs 'Challenges in the Built Environment for Vision Impaired People' (2021)



- We are concerned that high streets will become inaccessible if large areas of pavement are occupied by new furniture
- A rapid approval of new pavement licences could mean that people with sight loss are shut out of the consultation process
- Additional safeguards to reflect the impact on pedestrians with disabilities may be required in the post consultation process.

We would ask the Council to support reasonable adjustments that require the consultation process and resulting decisions about a permanent licence scheme to be accessible, require accessible layouts and strengthen powers of appeal.

Impact on people with sight loss

Obstacles on the pavement make navigating more difficult for people with sight loss. Changes to infrastructure as a result of social distancing have previously hit blind and partially sighted people disproportionately hard, with two-thirds of respondents to an RNIB survey reporting that they have felt less independent since social distancing was introduced. A considerable increase in street furniture throughout the Belfast City Council area could force blind and partially sighted people to walk in the road, change their route, avoid travelling independently, or even stay at home altogether.

Temporary street furniture creates additional challenges because it is not designed to be easily detected by people with sight loss - colour contrast may be poor, or furniture may allow a long cane to get trapped underneath it, causing a trip hazard. Wherever possible, street furniture should be marked off with an accessible barrier.²

We welcome recognition in draft guidance³ developed in Great Britain that local authorities should maintain minimum widths of pavement space to allow people with disabilities to navigate safely. It is

² For more detail, please see the sight loss sector's [Covid-19 street design guidance for local authorities](#)

³ <https://www.gov.uk/government/publications/pavement-licences-draft-guidance/draft-guidance-pavement-licences-outdoor-seating-proposal>



important to note that the widths specified⁴ there predate Covid-19 and therefore do not consider the potential need for additional space required for social distancing. Although this does not feature with the same priority in 2023/24 than in previous years - a permanent scheme should be robust enough to incorporate the need for social distancing again in the future, particularly for the wellbeing and safety of people with disabilities.

Recommendations for Belfast City Council regarding a permanent pavement café licence scheme

- Requirement for all businesses to use a barrier to separate furniture from the pavement and furniture placed sufficiently away from the pavement to allow for the safe passing of pedestrians.
- Ensuring the minimum pavement width required to allow two pedestrians to pass each other while socially distancing.
- Ensuring the needs of disabled people and the recommended distances required for access by disabled people have been taken into account e.g. long cane users, guide dog owners, people who need a sighted guide and wheelchair users.

A note on automatic approval

We recognise the need to grant pavement licences rapidly to enable economic activity. However, this needs to be balanced against the duty to consider the needs of disabled people.

We believe the volume of applications to Council could overwhelm the local authority and result in automatic approval for a significant proportion of licences. Combined with the absence of an opportunity to appeal, the automatic approval process risks allowing hazardous street furniture being permitted in inappropriate locations. If automatic approval is to be implemented, we recommend that the initial period of that approval be reduced to three months, in order to

⁴ Department for Transport, [Inclusive Mobility](#), section 3.1 recommends a minimum of 2m width



give local authorities the opportunity to revisit and review licences that may have been approved simply due to a lack of resources.

Recommendations:

- A requirement for Council to establish a right to appeal the approval of an application on the grounds of safety or inaccessibility for disabled people.
- A requirement to investigate concerns around accessibility when pavement licenses are granted and revoke the licence if the pavement is not sufficiently accessible.

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