

# Gateshead **Access Panel**

Disability Equality in Gateshead and the Region

## **Urban Core AAP Review January 2012**

### **Response on behalf of Gateshead's Disability Service User Involvement Forum to the Public Consultation**

LDF Feedback Report No 2  
for  
Development and Enterprise  
Gateshead Council  
Local Development Framework  
NewcastleGateshead One Core Strategy

January 2012

**Subject:** NewcastleGateshead One Core Strategy

**Document:** Urban Core Area Action Plan, Draft Sept 2011

**Reviews:** 06 December 2011- 04 January 2012

**Reference:** GAPCon-DESUIF-UCAAP-SH040112

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✉ ⇒ Unit K38, The Avenues, 11<sup>th</sup> Ave. North, Team Valley, Gateshead NE11 0NJ  
Tel: (0191) 433 0058 Fax: (0191) 487 7298

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### **Additional Feedback to Consultation**

**Note:** Reference should also be made to the following feedback reports prepared by GAP in response to the current public consultation:

**LDF Feedback Reports**

**No 1: One Core Strategy Review January 2012**

**No 3: Urban Design SPD Review January 2012**

**No 4: Housing Alterations + Extensions SPD Review January 2012**

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## Newcastle Gateshead Urban Core Area Action Plan Review January 2012

### Plan Wide Policies

#### Policies for Economy

5.5 states: "...Major growth will occur in the Urban Core due to its high accessibility and the availability of supporting facilities and services..." however such accessibility is not a given for everyone, particularly for those elderly and disabled persons who have restricted and limited choices for access and transport; and therefore limited access to such facilities and services.

#### Policies for Place: Urban Design

Policy 5 :Urban Design states:

"Development shall:

- deliver the high level of design quality befitting the Urban Core of a regional capital, in both its architecture and public realm, which is inclusive and accessible to all;"

as well as:

- "- ensure that it utilises current best practice methods particularly in terms of sustainable construction."

The former statement appears to be positive in respect of encouraging development of inclusive environments, however the latter statement appears to fail to match this by not reinforcing the perception of "sustainable construction" based on principles of 'inclusive design'.

"Sustainability and sustainable provision are discussed throughout the various sections of the document as an identified requirement of all policies and interventions. However, for true sustainability the policies, processes, schemes, and developments must be based on inclusive provision and inclusive design concepts, otherwise inequalities will result; which will require additional interventions and funding to redress. The need to be "inclusive" requires spelling out and reiteration wherever the term "sustainability" is used, to encourage the awareness of all those involved in the policies, processes and delivery, otherwise we will never be able to move close enough to a state of "Sustainability"."

GAP Review: Draft "One Core Strategy 2030", November 2011

The UK Sustainable Development Strategy "Securing the Future" (March 2005) describes a common purpose for Sustainable Development:

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“The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations.”

**Planning Policy Statement 1** (PPS1, 2005) states:

**National planning policies - Key principles**

Planning should facilitate and promote **sustainable and inclusive** patterns of urban and rural development by:

- making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;
- contributing to sustainable economic development;
- protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- ensuring high quality development through good and **inclusive design**, and the efficient use of resources; and,
- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted (see paragraphs 33-39 below).

Development plans should also contain clear, comprehensive and inclusive access policies - in terms of both location<sup>5</sup> and external physical access<sup>6</sup>. Such policies should consider people's diverse needs and aim to break down unnecessary barriers and exclusions in a manner that benefits the entire community.

**Planning for sustainable development - Social cohesion and inclusion**

Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should:

- ensure that the impact of development on the social fabric of communities is considered and taken into account;
- seek to reduce social inequalities;
- address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops,

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leisure and community facilities;

- take into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income<sup>7</sup>;
- deliver safe, healthy and attractive places to live; and,
- support the promotion of health and well being by making provision for physical activity.

**Delivering sustainable development – General approach**

In preparing development plans, planning authorities should seek to: Promote communities which are inclusive, healthy, safe and crime free, whilst respecting the diverse needs of communities and the special needs of particular sectors of the community.

**Design**

Planning authorities should plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.

High quality and inclusive design should be the aim of all those involved in the development process. High quality and inclusive design should create well-mixed and integrated developments which avoid segregation and have well-planned public spaces that bring people together and provide opportunities for physical activity and recreation. It means ensuring a place will function well and add to the overall character and quality of the area, not just for the short term but over the lifetime of the development. This requires carefully planned, high quality buildings and spaces that support the efficient use of resources. Although visual appearance and the architecture of individual buildings are clearly factors in achieving these objectives, securing high quality and inclusive design goes far beyond aesthetic considerations.

Latest national guidance ‘Draft Planning Policy Framework, July 2011’ states:

**“Deliver high quality design**

115. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.”

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5.45 states: “To ensure high quality design standards are achieved, residential development will apply the Building for Life model of residential design excellence, produced by CABE and the Home Builders Federation. At least a ‘silver standard’ will be expected.” Of the 20 criteria for assessment against the standard, the only recognisable criteria that appears to lend itself most closely to relevant aspects of residential development for disabled people is:

“15: Do internal spaces and layout allow for adaptation, conversion or extension?”

The application of this standard and its 20 criteria for assessment appears to do little to ensure residential development is appropriate for disabled people, especially in consideration that to achieve the silver standard only 70% or 14 out of 20 criteria need to be fulfilled, and this means some criteria such as 15 above do not need to be fulfilled to achieve the standard.

The assessment against this standard is carried out by trained assessors from within local authority planning departments, whose assessment does not require their consideration or awareness of suitable environments to support the needs of disabled persons, even if the assessors have the relevant knowledge and understanding of disability aspects: it is GAP’s belief (and experience) that such understanding is largely beyond the experience and training of many local authority planning officers.

Planning for People: Sustainable communities: Objectives:

124. The Government’s objective is to create strong, vibrant and healthy communities, by creating a good quality built environment, with accessible local services that reflect community needs and support well-being. To achieve this objective the planning system should:

- create a built environment that facilitates social interaction and inclusive communities
- deliver the right community facilities, schools, hospitals and services to meet local needs; and
- ensure access to open spaces and recreational facilities that promote the health and well-being of the community.

Draft Planning Policy Framework, July 2011

**Policies for Transport**

**Promotion of alternative travel choices and modal shift:**

When considering the promotion of alternative travel choices and encouragement of modal shift from motor vehicles to “more sustainable alternatives”, it is important to recognise that many disabled persons currently have limited travel options, and some are dependent on private vehicles, taxis or private hire vehicles. To encourage any such modal shift for such persons it is important to first consider what alternative sustainable travel options can and will be made available and how available and accessible such options will be: the reality currently is that this is not being adequately addressed and without specific targeted investment there will be little opportunity for improvement in the equality of opportunity for disabled people in respect of transport, and consequently less opportunity to access services and employment.

**Existing inequalities and limitations for disabled people**

GAP’s report responding to the Tyne and Wear LTP3 consultation in February 2011 identifies many of the current inequalities and limitations affecting disabled people’s access to travel in relation to infrastructure, travel modes, and services (copy available to download from GAP website [www.access-gateshead.org.uk](http://www.access-gateshead.org.uk) in section on DESUIF Reports or via link: <http://www.access-gateshead.org.uk/show.php?contentid=36> ).

**Walking**

When considering improvements to walking routes, it is important that these are design and constructed to inclusive design standards to remove or minimise any potential barriers to their use by disabled people. This will need to include: consideration of potential rest-points on route; appropriate use of surfaces, drop kerbs, pedestrian crossing and crossing tables; gradients and crossfalls; texture and tonal contrast; elements to assist orientation and way-finding; avoidance of obstructions, trip and fall hazards including suitable design and location of surface water drainage.

When considering changes to existing routes or proposals for new routes for pedestrians and acting on the statement at 5.86 that “...improving conditions for pedestrians is the priority and walking is the preferred mode of travel where practical...” such priority should recognise that motor vehicles can manage gradients far easier than pedestrians; and as such, vehicle routes should be diverted up-and-over or down-and-under pedestrian routes in preference to pedestrian bridges or subways diverting the pedestrian route.

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**Mobility Using Scooters and Wheelchairs**

Not all disabled people with impaired physical mobility can access or use a mobility scooter, but their important to some should not be minimised. Mobility scooters are the alternative means of travel for many people who are unable to walk more than a short distance; being predominantly used by people who can stand and walk at least a few steps and generally unsuitable for use by persons who are unable to stand when getting on or off a scooter.

Nexus have recently announced the continuation of the ban on scooter access onto metro trains, and buses remain inaccessible to all but the smallest of scooters; due to the physical limitations of existing metro trains, station platforms and buses. Many of these issues affecting access for mobility scooter users also affect powered and / or manual wheelchair users.

How can travel options be improved for mobility scooter users?

There are a number of options that should be considered: -

- Providing raised platform areas at metro stations to minimise the step level change when boarding and alighting trains;
- Providing secure storage for parking mobility scooters at transport interchanges (and local neighbourhood hubs) and on metro stations;
- Provide shopmobility style scooter pools at transport interchanges / hubs, similar to services currently provide by Gateshead Shopmobility at Saltwell Park, Swalwell Visitor Centre and Derwenthaugh Park, and Gateshead Quays (although such services are currently threatened by inadequate funding to support shopmobility locally and the loss of local authority staff at parks and countryside locations);
- Improvements to taxi ranks and authorised taxi pick-up and drop-off points to support passenger access to taxis designed to carry people in wheelchairs will also improve access for some mobility scooter users, providing ramp gradients are minimised and subject to vehicles with suitable door aperture heights being licensed locally; which is also an issue for many wheelchair users, especially those who use larger and heavier powered wheelchairs;
- Provision of charging points for mobility scooter and powered wheelchair battery packs at transport interchanges, hubs, metro stations and other public buildings and facilities such as public libraries, health centres, public toilets, shopping centres, leisure centres, etc.

**Cycling**

Whilst GAP recognise the health and well-being benefits of cycling as well as the green issues, there is little opportunity for disabled people to access cycling either

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because they do not have access to suitable equipment or are unaware of any such opportunities; which can be difficult to identify.

Shared surfaces and routes for use by pedestrians and cyclists are a principal concern to many disabled people, especially those who have sensory impairments. Being unable to see or to hear a cyclist approaching is very disconcerting even for people with normal hearing and sight, so it should be obvious that anyone whose sight or hearing is impaired will feel uncomfortable and potentially endangered if they have to use the same route as cyclists.

Cyclists unlike motor vehicles are not licensed and do not display a visible registration number, so any cyclist who rides recklessly or without due care and attention is unlikely to be reported or held accountable for their actions. Even where a shared route has a separation of cycleway and pedestrian path, this is generally inadequate and fails to increase confidence or sensory impaired persons when all that separates the passage is a painted white line; as well as failing to meet standards guidance for design of shared routes.

The location of cycling parking such as the commonly used Sheffield style hoops should not be located on or in pedestrian routes, as this creates potential obstruction and trip hazards for visually impaired persons. Such provision also fails to cater for parking of mobility cycles or scooters, although the security of these can also be a greater concern for their users; not just because of their equipment's monetary value but also because of dependency for their personal mobility.

### **Access to Public Transport**

Low-floor access buses have only one space for a wheelchair user, which prevents wheelchair users having any certainty of being able to access bus services for appointments or employment; as they are unable to board if the space is already occupied by a wheelchair user, or all too often by buggies and shopping or luggage, or the bus is crowded with persons standing. This 'one wheelchair space per bus' situation also prevents wheelchair users travelling with other family or companions, especially if more than one person uses a wheelchair. In addition, some people with large powered wheelchairs have reported being unable to or excluded from boarding a low-floor bus because of the size of their wheelchair; either being too big to manoeuvre into the space or because the driver believes their wheelchair to be too big to access the bus.

Whereas free public transport access has been available for disabled and older people, disabled people who are excluded from using public transport because of limitations in physical access to buses, trains, or metro, are having to pay to use taxi and private hire vehicles as a substitute means, with little or no subsidy. This situation increases their potential to be socially excluded, which has also been shown to increase health risks.

Gateshead Wheelchair Services have recently reported concerns to GAP that current wheelchairs designs are resulting in larger and heavier a wheelchair, which has implications for access to vehicle transport, ramps, lifting platforms and passenger lifts in use at public building and as part of the transport infrastructure; as well as for access in homes.

**Sensory and Cognitive Impairment Needs**

Many people with sensory or cognitive impairments have difficulty accessing information due to it not being available in suitable formats, or because the relevant information is not provided. Depending on individual needs, abilities, and severity of impairment, it is generally the case that:

- people with impaired sight need information either in larger print using easily recognisable fonts, pictures and pictograms, tactile elements, Braille or audio;
- people with impaired hearing need information in easily recognisable fonts, easily recognisable words and characters, enhanced audio, lip-speaking, or sign language (i.e. BSL for the indigenous population)
- people with cognitive impairments need information in use of easily recognisable words, names, characters, pictures, pictograms, and colours by association with specific locations, transport modes, or routes.

Therefore, other than providing information in non-indigenous languages, the widest range of peoples needs for information will be met when an increasing number of the above options for information delivery are employed.

Whilst much improvement can be achieved through the appropriate design of the physical environments for infrastructure and vehicle transport, the following provisions have been identified to be likely to provide the greatest benefit to people with sensory and cognitive impairments:

- provision of real-time information in legible fonts and via audio output on public transport, at stops, stations, and interchanges;
- maintenance of vehicle colours associated with transport routes;
- announcement of vehicle stops, door open and closing on buses and metro.

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**Public Parking and Park + Ride Facilities**

Some disabled people through limited choice, individual and local circumstance, are dependent on private vehicle transport to access facilities, services and employment. A large number of Blue Badge Holders who are eligible for a mobility benefit use generally the whole of this benefit, as well as additional personal income, to provide their own transport through lease hire of a Motability vehicle. It is therefore unreasonable to expect such persons who are generally on low and / or fixed incomes to additionally pay to use public car parks and / or public transport.

**Issues that are or will adversely impact on disabled people:**

- Restricted hours use of on-street bays shared with taxis;
- Lack of suitable facilities for 'wheelchair accessible vehicles' (WAVs) to enable boarding and alighting vehicles using a ramp, lifting platform or hoist;
- Car park infrastructure restricting access by use of parking barriers and ticket machines inaccessible to disabled drivers;
- Proposed / existing parking charges for Blue Badge Holders;
- Planned UTM system specification if it does not identify available parking for Blue Badge holders;
- Reductions in available long-term / commuter parking where this results in reduction or numbers of accessible parking bays for Blue Badge Holders;
- Movement of long-stay parking to the periphery of the urban core; where this results in loss of long-stay accessible parking for Blue Badge Holders;
- Restriction of site specific parking for developments, which can impact on access to employment, services, leisure, and shopping;
- Parking provided on "temporary surfaces" or in temporary locations can exclude disabled people where this is not provided to suitable standards.

"GAP has previously expressed concerns locally to Gateshead Highways Officers as well as in response to the LTP3 Core Team, with regard to the issues of parking provision and use of Park and Ride facilities by disabled people. With regard to parking provision, limitations and restrictions, it is very important to recognise that many disabled people will continue to be dependant on their own private transport for getting around, and the provision of suitably located accessible parking locations, and preferably off-road. Any reductions in parking provision, such as to encourage modal shift, should be managed so as not to adversely impact on disabled people, such as by retention or increase in the number of accessible parking locations. Whilst it is important for Park and Ride facilities to be accessible for everyone to use as far as possible, there will be limitations on its suitability

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and practicality for some people with mobility impairments, who currently depend on the use of their own private transport for getting around: for some it will be more cost effective to use their own transport to reach their intended destinations; and for many it will be less arduous with respect to reduced transfers between travel modes, which can have the impact of making the difference between whether or not they make the journey and have access to social interaction as well as facilities and services.”  
 GAP Review: Draft “One Core Strategy 2030”, November 2011

5.115 states:

“The Councils are implementing a rolling programme of installing electric vehicle charging points in on-street and off-street parking locations.”

GAP have not yet had confirmation of current provision to ensure that such charging points will be accessible for use by disabled persons, with respect to the charging point design and location; although we have requested that Gateshead Council ensure this is achieved and a review of their progress is planned for 2012.

**Quayside and Quays Sub Area**

This section discusses improvements proposed to pedestrian access between the Gateshead Town Centre down to South Shore Road and the Gateshead quayside, with “a defined public realm network using streets, squares, lanes and stairs, with a legible and permeable urban grain, which clearly defines public and private space”. It is very important to recognise the impact on disabled people, their carers, and elderly people, of the long and often extended distances that such routes need to take to thread their course through the built environment; coupled with the existing steep topography. Although it is also important to make the gradients of such routes as gradual as possible, it also needs to be recognised that this requires the routes to become extended in length; consequently making progress easier along the routes, but not reducing the potential for fatigue. The proposals to extend the green infrastructure along the primary pedestrian links will potentially provide greater opportunity for rest points and viewpoints with suitable seating, which may aid some mitigation of the distances and reduce the potential of traveller fatigue on-route. However, it remains the expectation of GAP and many people in Gateshead who have been consulted on various occasions on the development of the Gateshead Quayside and South Shore Road areas, since the proposals for the Baltic Centre for Contemporary Art, Sage Gateshead, and the MU9 site, that the planned developments will include passenger lift access; and not just the development of stair and ramped routes down towards the quayside level.

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Gateshead Shopmobility, supported principally by GAP, currently has four “outreach” partnership sites including the Sage Gateshead and Baltic Centre for Contemporary Art, the intention being that Gateshead Shopmobility scooters can be hired and used in the Gateshead and Newcastle Quayside areas. Current proposals to provide a Shopmobility outlet at the new Trinity Square development would also increase the opportunity for disabled and older people to utilise the scooter services between the town centre and quayside sub area; although this does not provide for many disabled people whose mobility impairments prevent their transfer and use of mobility scooters.

However, the sustainability of local shopmobility services will be dependent on financial and other resources being made available; such as from the local authority, Tyne and Wear LTP budgets, and importantly the developers and principal occupiers of these sites who are likely to benefit from the resultant improved visitor/customer accessibility. It will also be important to ensure the provision of shopmobility outlets are provided within suitably locations to support travel options and the disabled users mobility between public and private transport arrival points and their intended destinations; and may be best achieved as part of the master-planning of the developments, supported by relevant policies and planning obligations. Such strategic and local planning processes should include appropriate involvement of GAP and the Shopmobility service providers throughout.

### **Newcastle Central Sub Area**

Similar considerations should be given to shopmobility provisions in between the ‘Newcastle Central Sub Area’ and the ‘Quayside and Quays Sub Area’, although the Newcastle Shopmobility organisation currently have policies restricting the use of their scooters outside of specific areas of Eldon Square; and this would require further consideration and agreement with the respective shopmobility service provider.

### **The Central Station Arrival Point**

This section within 6.65 mentions the proposal to “create improved, integrated facilities for bus, coach, taxi drop off and parking and work towards the removal of traffic from the Station Portico”. However, this portico provides a very important covered access and drop-off facility for many disabled and older people, whose travel needs require the easiest available transfers to be made available to facilitate their mobility needs and to minimise their travel fatigue, with protection

from the weather. Any removal of this facility would need a replacement that is no less suitable.

**Gateshead Central Sub Area**

**Walking Cycling and Transport**

6.139 states that:

“...The restriction /removal of traffic around the Old Town Hall area will create a safer, more attractive environment for pedestrians...”

Whilst such improvements of this type are often welcomed, it is important to recognise that many disabled and older people need to have the opportunity to arrive by vehicle transport close to their intended destination and entrances to buildings, and due to the severity of the gradients in this locality, there is increased potential need for such vehicle access including taxis, private hire vehicles and private cars. Such requirements are recognised under building regulations and building standards, in the requirement to provide accessible parking and drop-off facilities in close proximity to accessible entrances. Although GAP supports the intentions of priority of access for pedestrians over vehicles, this should not be achieved by the exclusion of or creation of additional barriers to vehicle access for disabled persons; to such facilities as the Old Town Hall and its adjacent buildings.

**Southern Gateway Sub Area**

**Policy 52: The Exemplar Neighbourhood Key Site**

This indicates the development “...shall provide a sustainable neighbourhood through...” a number of measures including “...achievement of the Buildings For Life silver/gold standard...”. GAP does not consider this standard on its own to be appropriate as discussed earlier in this report in reference to section 5.45, and is more applicable to the overall planning of the neighbourhood rather than the design standards for the homes themselves. The importance of adoption approaches to design based on such as the Lifetime Homes and Wheelchair Housing Standards should also be included within the policy, as well as its current reference in the overall One Core Strategy for Housing development.

GAP also has concerns regarding the layout of housing developments that adopt the “Home Zones” approach, as discussed in our responses to the draft One Core Strategy documents. Principally that: “...’Promotion of home zones...’ fails to recognise the barriers and perceived safety concerns created for disabled persons with impaired physical mobility and sensory impairments...” and that “...Local guidelines for Home Zones should be developed with the involvement of local

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disability groups, which will encourage greater confidence in proposals for future home zones.”

**Appendix 1 – Key Documents and Evidence Base**

Although certain of the listed documents may include evidence based on consultation and involvement of local community including those representing the voluntary sector and under-represented groups, there is no evidence offered to confirm this. Also, there does not appear to be any documents that have been specifically provided by or include from such groups. GAP have produced a number of reports in recent years in response to local and regional consultations, yet none of these are identified as being considered in respect of the evidence base; which is not unsurprising when often there is little if any feedback on such reports and responses to consultations.

**Appendix 3 – Housing Sites**

Review of the tables suggests that possibly less than 50% of the new housing development in Gateshead (Forecast Delivery 2010-30 of 2000 homes) could be family houses, although the proportion of family homes, single occupancy and apartments is not confirmed. The planned numbers / percentage of family homes and breakdown of the proposed size (i.e. number of bedrooms) should be confirmed for clarity, along with a brief supporting statement of the basis of the proposed housing mix.

**Appendix 7 – Infrastructure Information**

**Walking Cycling and Transport:**

A number of projects refer to creation of cycle hubs and parking facilities for cyclists. As referred to above under “Policies for Transport: Cycling” it is important to avoid obstruction hazards to pedestrians with impaired physical or sensory mobility, and therefore a best practice approach should be adopted to ensure separation of cycle parking from pedestrian routes. Such provision, for equality of provision, should also consider the needs of parking for adapted cycles and trikes used by disabled persons as well as mobility scooters, for which a higher degree of security is appropriate in relation to monetary value and dependency for the disabled users.

Locations such as cycle hubs should also be considered for development and provision of additional facilities and services to support access and mobility as referred to in GAP’s response to the Tyne and Wear ITA’s Proposals for LSTF

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Main Bid in May 2011. For ease of reference the relevant passage from the ITA document is copied below with GAP's responses in blue text:

**“3.10 For cycling we are considering:**

- Cycle infrastructure improvements - improvements to cycle route network and cycle parking provision

Additional consideration required of how this may be offered to disabled people with specialist cycles / buggies / mobility scooters.

- Cycle hubs - Active Travel Centres incorporating a range of services/facilities including bike hire, servicing, storage, showers, changing and local route information. Can also act as the centre for outreach services such as cycle maintenance, GP referral schemes and National Standards training

“Mobility Hubs” rather than “Cycle Hubs” would be more holistic and beneficial, including additional facilities and services of Shopmobility, Changing Places toilet facilities as well as standard accessible (Approved Document M) toilets.

Shopmobility schemes should be seen as an integral part of the local transport plan and public transport options, offering mobility aids and access to support services, initially building on the existing schemes operating in the Tyne and Wear area.

- Community based repair and maintenance - community based project providing employment and skills development through repair and maintenance of bicycles.

Additional consideration required of how this may be offered to / involve disabled people.

- Community based route monitoring - use of volunteers to support the maintenance and improvement of cycle routes

Additional consideration required of how this may be offered to / involve disabled people.”

Ref: GAP Preliminary Response to TW LSTF Main Bid 2011, May 2011

Full version of the GAP response document is available on GAP website:

[www.access-gateshead.org.uk](http://www.access-gateshead.org.uk) or from link:

<http://www.access-gateshead.org.uk/show.php?contentid=36>

Steve Hudson

Design and Access Consultant, GAP Consultancy

Tel: 0191 443 0058 Direct Line: 0191 416 6560

Email: [accessconsultant@btinternet.com](mailto:accessconsultant@btinternet.com)

Web: [www.access-gateshead.org.uk](http://www.access-gateshead.org.uk)

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