

Accessibility Walkabout Audit Review: Tower Hill Station to Aldgate

By Transport for All for the City of London Corporation

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Introduction

This report presents observations and recommendations from three participants in an accessibility ‘walkabout’ in the Fenchurch area (see image of map below). The route, as represented by the purple line in the image below, starts from Tower Hill tube station and leads to the City of London. The participants identified key accessibility barriers and suggested improvements to create safer and more inclusive public spaces for disabled people. The report also includes guidance from Transport for All, considering legislative frameworks like the Equality Act 2010, Inclusive Mobility and BS:8300. These principles will ensure future developments are compliant and truly inclusive for disabled people.

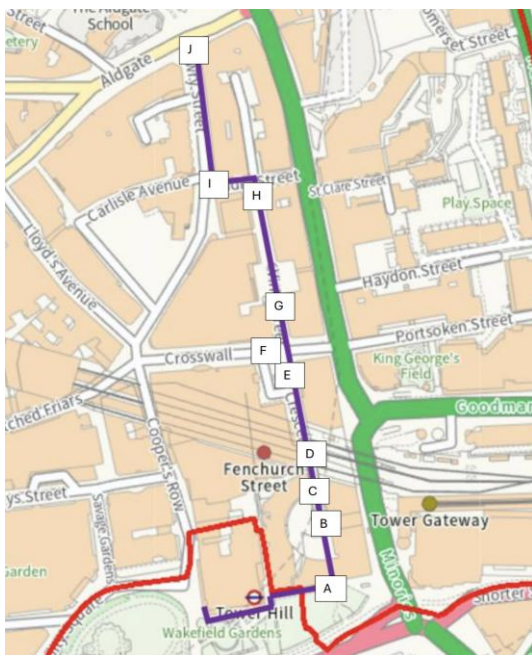


Figure 1: Map of the route, from Tower Hill Station to Aldgate

Transport for All’s work is rooted in the Social Model of Disability, understanding that the design of the environment can create barriers that prevent Disabled people to fully access and participate in society. Our lived experience and knowledge of the industry underpin the work we do to close the transport gap for disabled people and advocate for disability justice.

Our membership database enables pan-disability research and consultancy to be undertaken, ensuring that a range of disabled people can contribute to the development of accessible transport. The City of London requested at least one participant to have a mobility impairment, and at least one participant to have a visual impairment.

UK Legal Frameworks

Here's an overview of UK-specific guidance and legal frameworks to keep in mind when designing or reviewing streets and / or roads, to ensure that accessibility is considered:

Category	Key References	Core Focus
Legal duties	Equality Act 2010, PSED, Highways Act 1980	Accessibility, non-discrimination, safety
Design standards	Inclusive Mobility, BS 8300, Manual for Streets	Inclusive layouts, tactile paving, gradients
Cycling & walking design	LTN 1/20, Healthy Streets Approach	Safe separation, continuity, visibility

Involving disabled people to provide structured feedback on accessibility barriers in the public realm aligns with the duties set out under the Equality Act 2010 and the Public Sector Equality Duty (PSED). These frameworks require local authorities to engage with and consider the needs of disabled people when designing public spaces. Obtaining these lived experience insights therefore supports compliance with legal obligations and ensures that design decisions are evidence-based and inclusive.

Participant Feedback

Pavement Accessibility and Surface Conditions

- Lack of tactile paving makes navigation difficult for visually impaired individuals.
- Existing tactile paving is not very effective, as it lacks clear guidance.
- Pavement surfaces are quite slippery, especially in wet conditions, and lack tactile paving.
- The use of fake grass / astro turf further contribute to safety and accessibility concerns, such as disorientation for visually impaired individuals.
- Cobblestone paving has the potential to cause pain for wheelchair users.
 - Some blind and partially sighted individuals may conflate this to tactile paving, causing further confusion and disorientation.
- Rain can make barriers more noticeable and increases slipperiness.

Recommendations

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- Introduce tactile paving with a slight lip to provide clearer navigational cues.
- Raise the pavement to create a level surface across junctions, reducing trip hazards and improving accessibility.
- Improve surface materials to reduce slipperiness and clearly distinguish pedestrian areas from roads.

Physical Barriers and Pathway Design

- Plants and narrowing paths create obstacles for pedestrians.
- Lack of clear differentiation between pavement and road increases anxiety and confusion.
- Continuous paving across junctions and well-designed two-way cycle lanes are needed.
- There's a noticeable lack of dropped kerbs / step free crossings, particularly ones that have been maintained to a good standard, leading to a wheelchair user navigating the route on the road, rather than the pavement.
- Proper implementation of dropped kerbs and tactile paving would enhance accessibility.

Recommendations

- Widen pathways to allow safe and comfortable passing for wheelchair users and those using other mobility aids.
- Ensure the new cycle lane design includes contrasting colours or textures to clearly separate it from the pedestrian area.
- Raise the pavement and implement continuous paving across junctions to support step-free access where dropped kerbs aren't feasible.
- Implement more dropped kerbs consistently, and make sure these are regularly maintained.

Lighting, Contrast and Visibility

- Poor contrast and inadequate lighting make parts of this route dark and difficult to navigate.
 - Low lighting and visibility during rain exacerbate this.
- Better lighting would improve visibility and reduce hazards in poor weather conditions.

Recommendations

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- Improve lighting in the passageway and along key pedestrian routes to enhance visibility and safety.
- Use contrasting colours and materials to clearly differentiate between pedestrian, cycling and motorised areas.

User Experience

- Lack of tactile paving and poor differentiation between pavement and road increase anxiety for pedestrians.
- Anxiety and safety concerns are heightened by unclear boundaries and dark pedestrian routes.
- The traffic lights near Aldgate only allowed 6 seconds for pedestrians to cross the road safely.
 - These traffic lights did not have any audible cues to signal that it's safe to cross; this is vital for blind and partially sighted individuals.

Recommendations

- Explore incorporating public art or other design elements to make the area more welcoming, attractive and engaging.
- Maintain a consistent design across commercial and residential areas to improve wayfinding and navigation.
- Lengthen time traffic lights allow for pedestrians to cross the road and add audible signals.

Key Participant Recommendations

1. Introduce consistent tactile paving with a slight lip for better navigational support.

- a. Ensures safe navigation for blind and partially sighted people.
- b. Consistency and correct installation are essential for accessibility.
- c. Compliant with DfT Guidance on the Use of Tactile Paving Surfaces, BS 8300 and Inclusive Mobility.

2. Raise pavements and create level, continuous surfaces across junctions.

- a. Minimises trip hazards and supports independent mobility for wheelchair and mobility aid users.
- b. Ensures smooth transitions and avoids unnecessary level changes.
- c. Compliant with Inclusive Mobility, BS 8300 and Manual for Streets.

- i. If this is not possible in certain circumstances, ensure that there are contrasted dropped kerbs in place, and that these are regularly maintained so that individuals can cross the road safely and step-free.

3. Enhance lighting and contrasts to improve visibility and safety.

- a. Provides better orientation and reduces anxiety for low-vision and neurodivergent individuals.
- b. Ensures legibility and safe navigation.
- c. Compliant with BS 8300, Inclusive Mobility and the Equality Act 2010.

4. Differentiate pedestrian and cycle lanes using contrasting colours and materials.

- a. Prevents conflicts between cyclists and pedestrians.
- b. Improves spatial awareness for visually impaired users.
- c. Compliant with Manual for Streets, BS 8300 and Inclusive Mobility.

5. Integrate public art or design features to enhance the area's visual appeal and user experience, making the area more approachable.

- a. Makes the area more approachable and enjoyable.
- b. Should not obstruct accessible routes.
- c. Compliant with Manual for Streets, the Equality Act 2010 and PSED.

6. Widen pathways to at least 2 metres where possible.

- a. Allows safe passage for wheelchair users and people with mobility aids.
- b. Compliant with Manual for Streets, BS 8300 and Inclusive Mobility.

7. Ensure paving is smooth to avoid trips and falls, reduce disorientation for those who use tactile paving for navigating, as well as avoiding pain when navigating across cobblestone paving using a mobility aid.

- a. Surfaces should be firm, even, slip-resistant, and non-reflective.
- b. Irregular surfaces like cobbles can create barriers and discomfort.
- c. Compliant with BS 8300, Inclusive Mobility and the Equality Act 2010.

8. Lengthen time traffic lights allow for pedestrians to cross the road and add audible signals.

- a. Provides safe crossing for slower pedestrians, wheelchair users, and visually impaired people.
- b. Includes audible and tactile indicators for confidence and safety.
- c. Compliant with Equality Act 2010, TSRGD (2016), BS 8300 and Inclusive Mobility.

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Summary

The Equality Act 2010 and Public Sector Equality Duty (PSED) state that local authorities, such as the City of London, has a duty to remove barriers and ensure environments are accessible and equitable for disabled users.

Participants highlighted both positive and negative aspects of the area's accessibility. Whilst the quietness of the area was viewed positively, concerns were raised regarding pedestrian navigation and safety, particularly when the lack of traffic noise alongside no tactile paving causes barriers for blind and partially sighted individuals.

Key issues identified included:

- Lack of tactile paving and dropped kerbs / step-free crossing
- Slippery surfaces
- Inadequate lighting
- Poor differentiation between pavement and road surfaces

These factors were reported to cause anxiety and navigation difficulties, particularly where the pedestrian routes were unclear.

Participants recommended improvements such as more dropped kerbs and / or continuous paving across junctions, better lighting and consistent tactile paving to improve the overall accessibility, safety and experience of the area.

Further Comments from Transport for All

Improvements to Crossings

Continuous paving across junctions vs dropped kerbs

Equality Act 2010, PSED, Inclusive Mobility, BS 8300, Manual for Streets

Continuous, flush paving that is raised across junctions is generally considered best practice for inclusive design as it provides a smoother, safer and more visible route for all users (if it is well contrasted). Dropped kerbs are still useful in areas where full continuous paving isn't feasible, but these should have clear tactile and visual cues. Combining both where appropriate is often the best approach, with continuous paving for accessibility being the priority, and dropped kerbs in areas where continuous paving is not feasible.



Image 1: Dropped kerb that hasn't been maintained.

Image 2: Paving with no dropped kerb at crossing.

Dropped kerbs

Equality Act 2010, PSED, Inclusive Mobility, BS 8300, Manual for Streets

Local authorities have a legal duty to ensure accessible routes across roads. Poorly maintained or missing dropped kerbs can prevent wheelchair, mobility scooter and rollator users from safely accessing pavements. This may constitute a failure to make reasonable adjustments under the Equality Act. Dropped kerbs also need to remain in line with each other to ensure crossing is accessible and safe.

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Safety

Equality Act 2010, BS 8300, Inclusive Mobility

Infrastructure must not expose disabled people to additional risk when travelling. The lack of accessible crossings forces users into motorised areas, such as roads, which raises concerns with their safety, particularly during busy periods or evenings when there is reduced light.

Visual contrasts

BS 8300, Inclusive Mobility

Kerb edges should provide visual contrast (e.g. a contrasting strip or tactile surface) to help those with low vision identify the boundary between pavement and road.

Maintenance

Equality Act 2010, PSED, BS 8300, Inclusive Mobility

Authorities are responsible for not only installation but the ongoing maintenance of accessibility features such as dropped kerbs, continuous paving and tactile paving to ensure they remain safe and usable. Neglect may lead to indirect discrimination.

Traffic lights

Equality Act 2010, PSED, BS 8300, Inclusive Mobility, Manual for Streets, DfT Traffic Signs Regulations and General Directions (TSRGD, 2016)

Pedestrian crossings must allow sufficient time for all users, including those with mobility impairments, to cross safely. Short crossing times may disproportionately disadvantage disabled and older people. Crossings must include audible cues (beeps) and tactile indicators (rotating cones) to support visually impaired pedestrians. These features should be maintained regularly, and timings should reflect real-world walking speeds; the DfT's recommended design walking speed for signal timing is 1.2 m/s, but many authorities reduce this to 1.0 m/s or lower to improve accessibility.

Improvements to Pavements

Pavement widths

Inclusive Mobility, BS 8300, Manual for Streets

Pedestrian routes should have a minimum clear width of 1.5 metres (ideally 2 metres) with consistent, uncluttered layouts. Widening is essential where street furniture narrows the path to allow wheelchair users and people with mobility aids to pass through safely.

Surface materials

BS 8300, Inclusive Mobility, Manual for Streets

Ground surfaces must be firm, even and slip-resistant in all weather conditions. Cobbles and irregular surfaces should be avoided on primary pedestrian routes as they cause pain for wheelchair and mobility aid users and confusion for those relying on tactile cues. Adequate drainage must also be provided to prevent slipperiness in wet weather.

Pavement distinctions

Manual for Streets, Inclusive Mobility, BS 8300

Where traffic levels are low or kerbs are less defined, there must be a clear visual and tactile distinction between pedestrian, cycling and motorised areas to support safe navigation for visually impaired users.

Ramps and slopes

BS 8300, Inclusive Mobility, Manual for Streets

Gradients should ideally be $\leq 1:20$, with level landings and sufficient width (minimum 1.2m clear, ideally 1.5m or more). Tactile paving must be provided at the top and bottom of ramps and slopes for orientation and safety.

Glare and surface reflections

Equality Act 2010, PSED, BS 8300, Inclusive Mobility

Wet or glossy paving can produce uncomfortable glare and reflections, particularly in bright sunlight, which can reduce visibility and make navigation more difficult for visually impaired and neurodivergent individuals. Reflective or polished surfaces may also reduce the visibility of hazards or slopes and ramps, increasing the risk of trips and disorientation. The use of matte, non-reflective and slip-resistant surfaces helps maintain visibility and safety in varying weather conditions. Local authorities have a

responsibility to identify and minimise such environmental barriers to ensure public spaces are accessible, inclusive and comfortable for all users.

Street furniture and obstructions

Inclusive Mobility, Manual for Streets, BS 8300, DfT Guidance on the Use of Tactile Paving Surfaces

Pedestrian routes must remain free of obstacles and maintain a minimum clear width of 1.5 metres (ideally 2 metres). Street furniture must be placed consistently and avoid the main pedestrian flow. Visual contrast alone (e.g. yellow stripes) is insufficient; objects should also be detectable by a long cane or positioned to avoid conflict with pedestrians entirely where possible.

Safety bollards

Inclusive Mobility, BS 8300, Manual for Streets

Bollards should only be used where necessary for safety and should be clearly visible, well-contrasted and detectable by a long cane. A minimum clear width of 1.5 metres between bollards is required for wheelchair and mobility scooter access. When poorly placed, bollards can act as barriers or trip hazards for some disabled people. Where bollards are already in place, and are unable to be moved, pathways (including dropped kerbs and tactile paving) must be positioned to ensure clear, unobstructed access to ensure that they don't interfere with crossings or tactile paving zones.

E-Cycles

Equality Act 2010, Inclusive Mobility, Traffic Management Act 2004

Local authorities have a duty to manage highway obstructions. E-cycles must be stored or docked within designated zones to maintain accessible, clutter-free pavements.

Allowing them to block crossings, dropped kerbs or tactile routes can undermine accessibility and create barriers for those navigating the area.



Image 5: Dropped curb with contrasted tactile paving, with no tactile cues on the steep slope on either side.
Image 6: Dropped kerb with no tactile paving.

Tactile Paving

DfT Guidance on the Use of Tactile Paving Surfaces, BS 8300, Inclusive Mobility

Tactile paving is required to warn blind and partially sighted pedestrians of level changes and assist safe navigation. It must be used consistently and in accordance with DfT standards, including before and after ramps or slopes. Additionally, mixing cobblestone paving with tactile surfaces can confuse visually impaired pedestrians and reduce reliability of tactile warnings for identifying kerbs or crossings. Colour contrast must be considered with tactile cues to warn of hazards and assist visually impaired pedestrians. Tactile paving (typically blister paving) must be installed at pedestrian crossing points to warn visually impaired people of the road edge. The design, colour and placement must follow DfT tactile paving standards.

Improvement to Area

Lighting and visibility

Equality Act 2010, BS 8300, Inclusive Mobility, Manual for Streets

Public spaces must provide consistent and well-distributed lighting to support visibility and navigation and to reduce anxiety and stress for people with low vision or neurodivergent individuals. Good lighting also supports personal safety; poor or inconsistent lighting can increase the risk of accidents occurring.

Neurodiversity and sensory accessibility

Equality Act 2010, BS 8300, Inclusive Mobility

Inclusive design must consider sensory accessibility. Inconsistent lighting, irregular texture and confusing boundaries can cause stress or disorientation for neurodivergent users.

Consistent layouts

Equality Act 2010, PSED, BS 8300, Inclusive Mobility, Manual for Streets

Public spaces should have predictable and continuous layouts, with kerbs, street furniture, crossings, tactile paving and other features placed consistently. Consistent layouts help visually impaired, neurodivergent and mobility-impaired users navigate safely and confidently, reducing the risk of trips, collisions or disorientation.