May 6, 2014

RE: Toronto Street Furniture Program – Guidelines for Creative Advertising Proposals

Dear City of Toronto Councillor and Councillor Office staff,

The City of Toronto’s General Manager of Transportation Services submitted recommendations to adopt and amend the Street Furniture Agreement. The recommendations include the ‘Guidelines for Creative Advertising Proposals.’ We believe this proposal will have an adverse impact on the safety of transit users across the City.

As you may already know, METRAC partnered with the Toronto Transit Commission (TTC) and Toronto Police Services to lead an extensive Safety Audit of the subway system and some surface bus routes in 1988. In 1989, METRAC presented the Moving Forward- Making Transit Safer for Women report to the TTC with 63 recommendations and 86 guidelines for future construction. Guidelines A-42, A-71 and A-73 each stipulate that transit shelters must be built using materials that are transparent from the top to the bottom to allow for natural surveillance into and out of shelters.

Transparent transit shelters have since become standards of best practice in public safety across the Greater Toronto Area as well as in other municipalities around Canada and the world. The City and TTC have been leaders in modelling the provision of safety infrastructure for public transit users and this approach remains compelling, and leadership in this area is critical and must continue.

The present creative advertising proposals to wrap transit shelters in translucent advertising that will cover up to 65% of shelters, and 100% roof tinting of shelters is unacceptable. This will place TTC users at considerable risk for theft, sexual and physical assaults and harassment. Transit users, TTC operators, pedestrians and drivers will not have a clear view into and out of shelters that are wrapped with this type of advertising. We have attached a brief backgrounder that explains the need for fully transparent transit shelters.

We urge you to amend the City’s Street Furniture Agreement and only allow 100% transparent bus shelters. At a minimum, please refer this matter back to the Public Works Committee for further study and public consultation. Do feel free to direct any questions or comments about this letter to my email address, executivedirector@metrac.org, or call 416-392-2928.
Sincerely,

Wendy Komiotis
Executive Director
METRAC

Signed and supported by the following organizations: WomanACT, White Ribbon Campaign, Toronto Women's City Alliance, Wellesley Institute, Womenatthecentre, South Asian Women's Centre, Social Planning Council of Toronto, Newcomer Women's Services, Coalition for Better Childcare, Springtide Resources, and the Older Women's Network.
Street furniture and public transit:
The importance of using transparent transit shelters

A number of reports and studies have been conducted in Toronto and across North America that assess the design and safety of public transit shelters. Below are a number of recommendations around the need to use fully transparent transit shelters.

- APTA (2010) states that transit shelters are often one of the first points of contact for passengers when they are accessing public transit. The design of transit waiting areas that enhance security is said to play a significant role in a person’s decision to use transit (APTA, 2010, 3).
- Brennan (2011) reports in the Juristat article *Canadians’ perceptions of personal safety and crime, 2009* that 58% of Canadians feel less safe when using or waiting for public transit at night. This issue is gendered because while 73% of male identified respondents report being not at all worried when waiting for public transit at night, only 42% of female respondents say that they are not at all worried at night-time. Fully transparent shelters help to ease these fears while persons wait for public transit, particularly at night.

Previous Guidelines on Transit Shelters and Safety in Toronto

- METRAC’s (1989) *Moving forward: Making transit safer for women* report on its audit of the TTC subway and bus system was a seminal study that created specific guidelines to address safety concerns on public transit. This report has been used internationally as a best practice tool to assess safety on public transit systems. The report clearly states the importance of having clear sightlines and lighting on public transit, including at shelters, to assist in creating a safer environment for women transit users.
- The report states the need to use transparent material such as glass to increase and improve sightlines at transit shelters (p. 29).
- The report includes guidelines for future construction and renovation on the TTC of transit shelters as follows:
  - Guideline A-71- the walls of a shelter should have the transparency of glass, ideally from floor to ceiling, since this provides for good sightlines.
  - Guideline A-72 - If for structural reasons there needs to be a partition midway up the walls of a shelter, it should be transparent, if possible to not interfere with the sightlines of passengers sitting in the shelter.
  - Guideline A-73 - The placement of advertising, telephones and stairways should not interfere with sightlines into or out of the shelter.
- Guideline A-75 - If the shelter itself is going to be lit at night, this can cause the Fish Bowl effect – the situation where people outside the shelter can see a person waiting inside perfectly, but the person inside may not be able to see out as well, to the extent it is relatively dark outside the shelter. The lighting level outside the shelter should be improved to that this effect, and the attendant discomfort of patrons, can be minimized.
- Guideline A-76 - The use of glass or other transparent materials should be considered for construction of shelter ceilings. At night this would let in overhead street lighting which may help to avoid the Fish Bowl effect. During the day transparent ceilings let in natural light.

The Vibrant Streets: Toronto’s Coordinated Street Furniture Program Design and Policy Guidelines states at point 6.4 that “the design of street furniture elements must incorporate safety and security features” (p. 21).

The Vibrant Street Guidelines also include the following notes under section 6.4:
- All street furniture elements must use safe materials and design details to prevent injury.
- Street furniture and its placement must consider visibility and sightlines, lighting, barrier-free accessibility and ingress/egress issues as they relate to women, children, the elderly and the disabled
- To maintain visibility at night, it is critical that sufficient lighting be incorporated into the interior of transit shelters.
- Where appropriate, street furniture should incorporate provisions for panic alarms /communications.

Crime Prevention through Environmental Design (CPTED)

- Crime Prevention through Environmental Design (CPTED) is an internationally recognized crime prevention strategy used by planners, architects, police, security professionals, schools, transit authorities and others to ensure that public spaces are designed in ways that deter crime and unsafe activities.
- Two of CPTED’s main principles are: 1. to ensure the natural surveillance of public spaces; that is, persons can see into and out of a space; the second principle is to provide clear, unobstructed sightlines. Applying CPTED principles to the design and placement of a transit stop or shelter is essential to identifying safety issues and concerns (APTA, 2010).

Design of Transit Shelters

Sightlines and Visibility
- Universal design guidelines state that transit shelters should be constructed of materials that “allow clear, unobstructed visibility of and to patrons waiting inside” (25). The APTA states that there should be 360-degree visibility in and around bus shelters at all times (2010). Kimley-Horn and Associates Inc. (2004) agree with these stipulations and state that there should be “clear visibility of, through,
and around the bus stop for both passenger surveillance of environment and for police surveillance" (p. 77).

- Additionally, the view of walking routes around transit stops and waiting areas, should not be blocked by walls, other structures and design features that hinder security and access that isolate passengers should be avoided (Kimley-Horn and Associates Inc., 2004, 77).

**Location of Advertising**

- Many transit agencies have paid advertising on transit shelters to reduce costs and to provide other benefits. Passenger and pedestrian safety and security are of greater concern at shelters with advertising. The advertising panels may limit views in and around a bus stop, making it difficult for transit operators to see patrons, especially if persons are seated and/or using a wheelchair or scooter.
- Such panels can also reduce incidental surveillance from passing traffic. To prevent restricted sight lines, advertising panels should be placed downstream of the traffic flow, to assist an approaching transit operator's view of the interior of the shelter. Indirect surveillance from passing traffic should be preserved through proper placement of the panels (Nelson\Nygaard Consulting Associates, 2011)

**Reference List**


