

R N I B

Scotland

See differently

City of Edinburgh Council consultation “Retaining Spaces for People” - Response submitted by RNIB Scotland by email to street.schemes@edinburgh.gov.uk

Introduction

The Royal National Institute of Blind People (RNIB) Scotland supports children and adults with sight loss and helps them to live full and independent lives, campaigning for their rights.

City of Edinburgh Council consultation “Retaining Spaces for People”

The Overview of the Stakeholder Survey states that:

“During the Coronavirus pandemic, we’ve put ‘Spaces for People’ measures in place that aim to:

- help parents/carers and children to physically distance near schools
- help people to physically distance while using high streets, some city centre streets, and while exercising
- provide protected cycle lanes on main roads, so that people can consider cycling for trips that they might otherwise make by public transport.

Many Spaces for People measures are in place, but some are either currently being installed or will be installed soon. To allow quick installation of the Spaces for People measures within the available budget, we’ve used low cost materials, including rubber kerbs and plastic barriers.”

Questions 1-4 relate to “Your awareness of Spaces for People measures” including question 4 How would you describe the impact of ‘Spaces for People’ projects on the organisation you represent or, if applicable, its members? Questions 5-7 are on the “Benefits and disadvantages of Spaces for People”; Questions 8-11 ask about specific existing ‘Spaces for People’ projects that you would like to either remain in place or be removed following the pandemic; questions 12-15 seek views on measures that have been installed since mid-February, are still being installed, or are still being planned.

The specific and localised nature of many of the questions make it inappropriate for a national sight loss organisation to respond using the online survey. Ergo, RNIB Scotland is not submitting an online response to this consultation.

RNIB Scotland and Spaces for People

In May 2020, we circulated our policy position in response to the new Spaces for People initiative, including a Coronavirus Courtesy Code which we believe would help ensure that blind and partially sighted people can get out and about whilst maintaining a safe distance from others. This code - which can be found on our website at <https://www.rnib.org.uk/scotland/campaigning-rnib-scotland/coronavirus-courtesy-code> - was sent to all Scottish local authorities, including the City of Edinburgh Council.

We also indicated that, beyond circulating the Code, RNIB Scotland does not have the capacity to respond to the profusion of local authority consultations on altering street layouts that have since been forthcoming. These are highly local and detailed, with a reliance on photos and images that are inaccessible to blind and partially sighted people. The time for reply is also usually very limited.

We believe that our Coronavirus Courtesy Code reflects the broad recommendations that we believe should be a minimum standard in ensuring public spaces are accessible for people with sight loss and other disabilities.

On 1 March 2021 RNIB Scotland wrote to the City of Edinburgh council asking to be removed from the Spaces for People notifications mailing list as we are not able to comment on very local individual consultations.

Although not responding to individual area schemes, RNIB Scotland is collaborating with other organisations, including the Edinburgh Access Panel and Guide Dogs Scotland, to raise our general concerns about the implementation of these. We remain ready to be consulted on the strategic elements of future policy.

Summary of concerns relating to Spaces for People

We recognise the emergency nature of our present situation and so initially welcomed the Spaces for People initiative to enable people to physically distance whilst moving around the streets.

Across Scotland the programme has so far utilised almost £39 million funding. The recent Programme for Government stated that local authorities “now have the opportunity to review the temporary infrastructure projects – turning many of them into permanent schemes.” We are concerned by the prospect of schemes introduced at speed and with minimal consultation becoming permanent.

The pandemic has already had significant consequences for blind and partially sighted people; new street layout arrangements may effectively extend lockdown for blind and partially sighted people.

Feedback from our service users confirms that they are finding the new arrangements challenging. A recent RNIB survey found that 66 per cent of people surveyed said that they feel less independent than they did before the COVID-19 pandemic. When lockdowns/tier restrictions eventually ease visually impaired people will increasingly have to familiarise themselves with new layouts.

Disability Equality Scotland published a [survey](#) in September 2020 on Spaces for People. Most people who responded (71% - N=333) said that the changes had made it more difficult for them to get around.

The report concluded:

“In some areas, pavement extensions had created a hazard by extending into roads without the inclusion of dropped kerbs. Poorly designed pop-up cycle lanes which incorporate floating bus stops do not take account of disabled people getting on and off buses. A failure by local authorities to consult with disabled people and Access Panels prior to introducing the Spaces for People changes

is a significant misstep, which must be rectified through proactive and meaningful engagement going forward.”

In February 2021 we wrote jointly with the Edinburgh Access Panel and Guide Dogs Scotland to express concern that at a meeting of the council’s Transport & Environment Committee on Thursday January 28, the decision was taken to launch a city-wide consultation on the basis of which temporary traffic measures and road closures could be made permanent.

Our specific concerns included making temporary changes permanent in the absence of a full Equality Impact Assessment. Although an Equality Impact Assessment was undertaken at the start of the Spaces for People programme, we don’t consider it to have been adequate. Changes to the roads, pavements and parking all have a disproportionate impact of people with disabilities and, therefore, require a full and detailed impact assessment.

We also questioned the validity of consulting about the post-pandemic situation during the pandemic because opinions will be based on assumptions about what the future will look like.

RNIB Scotland retains these concerns and we have identified the following broad areas of concern about the built environment:

- Local consultation documents highly dependent on photographs, maps and diagrams that are inaccessible to the visually impaired (and non-compliant with web accessibility legislation);
- Lack of public (and accessible) information explaining local schemes - blind and partially sighted people are experiencing difficulties in accessing accurate and up to date information about changes;
- Concerns over the usability of traffic lights including silencing of audio sounds;
- Pavement clutter;
- Concern over pavement café sprawl;
- Increased numbers of proposed floating bus stops and bus boarders alongside temporary cycleways;
- Concerns over the implications of closing off vehicle access within town centres for loading and pedestrian access along with removal of parking bays including blue badge spaces;

- General failure to prioritise pedestrian movements, let alone pedestrians with disabilities including sight loss.

Response to specific survey questions

Question 4 of the stakeholder survey asks, “How would you describe the impact of ‘Spaces for People’ projects on the organisation you represent or, if applicable, its members?” Whilst temporary measures to widen pavements may have allowed for greater social distancing, overall, people with sight loss do not appear to have benefited from the schemes. We consider the effects to be mainly negative and do not wish blind and partially sighted people to be presented with a fait accompli of new layouts when coronavirus restrictions eventually ease. Current government guidelines to stay at home prevent people from accessing areas that they would routinely frequent. Therefore, decisions on retaining changes appear premature.

Question 7 asks “What would you say are the most important disadvantages of retaining ‘Spaces for People’ measures in place, in relation to the organisation you represent or its members?” We agree with several options of possible disadvantages, such as making it harder to cross the road safely.

Some measures introduced have made things more challenging and potentially dangerous for blind and partially sighted people. Access to the kerb is crucial for disabled people when travelling by bus, taxi, or community transport, as highlighted by this blog -bit.ly/3clyxFI. Pick up and drop offs become challenging and unsafe, as the disabled person must negotiate their way from a vehicle, over a cycle lane to reach the safety of a pavement. Concerns floating bus stop and bus stop borders requiring pedestrians to cross cycle lanes to access bus stops have been jointly and separately raised by RNIB Scotland, Guide Dogs Scotland and the Edinburgh Access Panel.

We are unable to make meaningful comment on the section entitled “Spaces for People projects being installed, or not yet installed” as it isn’t possible to know what the schemes would look and feel like.

Question 13 asks about measures to be retained. Whilst we can’t comment on specific schemes, wider pavements to allow for social distancing can improve the experience of all pedestrians as can reduced street clutter. Measures such as this, as well as maintenance of

footways, would benefit people with sight loss as well as other pedestrians.

Overall, however, we are concerned that temporary changes will be made permanent without an evaluation of the impact for blind and partially sighted people. Scottish sight loss organisations have jointly written to the Cabinet Secretary Michael Matheson to express concern that schemes introduced at speed and with minimal consultation will become permanent and to seek assurance that there shall be an independent third-party national review of Spaces for People before any changes are made permanent.

For further information please contact:

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