



City of Edinburgh Council consultation 'Retaining Spaces for People' Response submitted by Guide Dogs Scotland

Guide Dogs Scotland will not be submitting an online response to this consultation. We consider the content and structure of the survey to be restrictive and not applicable to us as an organisation representing blind and partially sighted people.

Instead, we are submitting an open response based on our concerns about Spaces for People and its implications for blind and partially sighted people.

Introduction

Spaces for People was intended to be a temporary infrastructure programme, offering funding and support to make it safer for people who choose to walk, cycle or wheel for essential trips and exercise during the Covid-19 pandemic. Like many other organisations, Guide Dogs Scotland, initially welcomed the initiative which promised to make social distancing easier.

However, we also made it clear that any changes must improve accessibility for everyone. Changes to high streets or areas where pedestrians access amenities or public transport are likely to have a disproportionate impact on people with sight loss.

A summary of our key concerns and recommendations on how to meet the needs of blind and partially sighted people are contained in Appendix 1.

A summary of our concerns about this consultation exercise

- 1. 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.

- 2. We question the validity of consulting about the post-pandemic situation during the pandemic because opinions will be based on assumptions about what the future might look like.**

The COVID-19 pandemic has significantly changed how, and how often, people move around the city. [Data](#) provided by Transport Scotland shows that on average people make 1.7 journeys per day; the overall number of journeys are down on pre COVID levels. Modes of transport and frequencies of journeys, post COVID are difficult to predict. The Councils own Mobility Plan makes the point well:

COVID-19 has had a profound impact on transport demands and mobility patterns.⁸ At the time of this Plan's publication, a high level of uncertainty remains especially around medium to longer term impacts.

Our response to the consultation survey

Question 2 and 3: are not applicable to us as an organisation representing blind and partially sighted people. We have encouraged Edinburgh based service users to submit individual responses.

Question 4: How would you describe the impact of 'Spaces for People' projects on the organisation you represent or, if applicable, its members? For the reasons touched on above and spelt out in detail in Appendix 1, we consider the impact to be mainly negative. There is anecdotal evidence that temporary measures to widen pavements have allowed for greater social distancing but, overall, people with sight loss do not appear to have benefited from the schemes.

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.

Question 5: How much do you support or oppose retaining the following types of measure as a means of achieving longer term Council objectives? The consultation is entitled ‘Retaining Spaces for People’; this question takes us beyond the original project, the aims of which were “...to implement measures focused on protecting public health, supporting physical distancing, and preventing a second wave of the outbreak...” The Council’s longer-term objectives should not be confused or conflated with their desire to retain all or part of Spaces for People. We do not think it is appropriate or applicable for us to comment on the Council’s longer-term objectives in this context.

Question 7: 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? This question gives several options of possible disadvantages, many of which we would agree with (e.g., making it harder to cross the road safely). However, our concerns are at a fundamental level; there has been little or no meaningful engagement with people living with sight loss to ensure that the changes made are safe.

Some measures introduced have made things more challenging and potentially dangerous for blind and partially sighted people. The introduction of cycle lanes, for example, can deny disabled person access to the kerb which is crucial when travelling by bus, taxi, or community transport. Pick up and drop offs become challenging and unsafe, as the disabled person has to negotiate their way from a vehicle, over a cycle lane to reach the safety of a pavement.

Questions 8 and 10 are best responded to by service user navigating these areas.

Points related to the section entitled ‘Spaces for People projects being installed, or not yet installed’.

Guide Dogs Scotland can’t comment in detail on schemes not yet installed. We urge local authorities to engage in meaningful consultation with blind and partially sighted people in each area. On a broader level, we question the methodological appropriateness of asking respondents to comment on schemes yet to be installed as they can’t fully appreciate what the scheme would look and feel like.

Question 11: Measures you would like to see removed.

In general, 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.

Guide Dogs Scotland, RNIB Scotland and the Edinburgh Access Panel have all expressed concerns about the floating bus stop and bus stop borders. In both cases pedestrians must cross cycle lanes to access a bus stop, exposing them to increases risk of accidents and injuries. We also note that the promised workshop discussion on floating bus stops/bus borders has yet to take place despite a commitment by the Council made in August 2020.

Questions 12 relates to measures currently being installed or due for installation. We question the appropriateness of asking respondents to comment on schemes currently being installed or yet to be installed; neither we or members of the public can fully appreciate what these schemes would look and feel like.

Question 13: measures to be retained. We can’t comment on specific measures. However, we do know that some people with sight loss have appreciated measures to widen pavements to allow for social distancing. Measures such as this can improve the experience of all pedestrians. We also commend the Council for its work with Living Streets Edinburgh to reduce street clutter. Measures such as this, as well as maintenance of footways, would make a great difference to people with sight loss.

Questions 14 and 15: see our comments above.

Appendix 1

Covid-19 street design guidance: keeping high streets accessible for people with sight loss - Guide Dogs Scotland

We welcome plans to make streets more inclusive for pedestrians in response to Covid-19. Street design plays a key role in enabling blind and partially sighted people to get around with confidence. We have prepared this guidance for local authorities, planners and designers to help you make changes while ensuring streets remain accessible for people with sight loss.

During the Covid-19 outbreak, increasing the space available for walking is particularly important for people with sight loss, who may struggle to maintain social distancing from other pedestrians who they cannot see. It is important that changes, including those intended to encourage cycling, maintain or improve accessibility of our streets for everyone. Changes to high streets or areas where pedestrians access amenities or public transport are likely to have the biggest impact on people with sight loss.

It is crucial that any changes made are clearly communicated to people with sight loss. Under the Public Sector Equality Duty, local authorities and planners must ensure that the needs of people with disabilities have been considered and equality legislation requires that projects include reasonable adjustments for people with disabilities.

The need to act rapidly must not mean that these duties are overlooked; accessibility requirements apply to temporary measures just as they do to permanent ones. We appreciate that many local authorities will have moved quickly to make changes, but these duties do not end once a scheme has been installed. Where temporary schemes do not meet the needs of people with sight loss, these should be reviewed in line with our recommendations below.

Consultation and engagement

Although the pace of change means that consultation may be less formalised, it remains important to seek input on how schemes will affect blind and partially sighted people. Local sight loss organisations will often be best placed to provide this input.

- Seek input from local sight loss organisations and blind and partially sighted road users on proposed changes to road layouts at the design stage
- Consultation and engagement must be carried out in an accessible way, for example all websites used should meet the web accessibility directive

Communication

People with sight loss will only be able to take full advantage of additional space for walking if they are aware it has been made available. Purely visual cues on the street, such as signs indicating changed layouts, are unlikely to achieve this.

- Changes to street layouts must be communicated in an accessible format: for instance, online maps which meet web accessibility standards should be made available to show changes across a neighbourhood, and updated regularly
- Local sight loss organisations and blind and partially sighted road users should be consulted on how to communicate changes effectively
- As far as possible, pre-change street layouts should remain legible so they can be used by people with sight loss even if they are not aware what changes have been made

Review

While changes to street design may have already taken place, temporary schemes are easier to amend when they do not meet the needs of disabled road users. Many of our recommendations below on street design can be applied to existing measures without changing the nature of the scheme.

- Evaluate whether disabled people, including people with sight loss, can use temporary measures effectively

- Prioritise changes to existing schemes where people with sight loss cannot navigate them independently

Changes to walking infrastructure

People with sight loss rely on physical cues such as kerbs, tactile paving and controlled crossings to navigate safely. Tactile paving and height changes given by kerbs provide important navigational information to cane users, and guide dogs are trained to stop at these features, so if they are missing, navigation becomes difficult or impossible.

- Existing kerbs, tactile paving and controlled crossings should be maintained to ensure that blind and partially sighted people know where the pavement ends and the road begins
- Consider whether additional temporary tactile paving will be needed to enable people with sight loss to use reallocated space safely. This is particularly important where pedestrian areas are only separated from the road by permeable barriers and there is therefore a risk of people with sight loss inadvertently walking into the road.
- For longer-term interventions, consider creating a temporary kerb to assist people with sight loss
- Temporary features, such as planters or barriers, used to reallocate space must feature colour contrast, avoid any trip hazards and be easy for people with sight loss to detect with a long cane - cones are not appropriate markers for pedestrian areas
- One-way systems for pedestrians should be avoided, as blind and partially sighted people may be unable to follow them without additional support. This may result in conflict with other pedestrians. If a one-way system is to be used, the layout must be communicated effectively to people with sight loss and each direction must be separated from the other with physical features, such as an accessible barrier.
- New signage indicating changed layouts should be kept to a minimum to avoid additional street clutter, with

signs positioned so that they do not present a potentially dangerous obstacle for blind and partially sighted pedestrians

- All signage should be in clear, large print with strong contrast
- Remove non-essential street furniture such as A-boards to increase space on the pavement and reduce obstructions
- Any new queuing areas or outside seating for cafes or restaurants should be located away from pedestrian desire lines; these areas should be marked out with accessible barriers with tap rails to make them easy to detect
- Restrict pavement parking wherever possible, as it reduces space available for pedestrians; with a temporary TRO in place, it may be possible to co-locate the signage needed for pavement parking restrictions with signs indicating new layouts

Changes to cycling infrastructure

People with sight loss often rely on hearing to navigate safely and find it difficult to detect and avoid quiet cycle traffic. This has the largest impact where pedestrians and cyclists share space.

- The default position of any proposed changes should be that space is reallocated to cycling on the carriageway
- Shared use areas where pedestrians and cyclists use the same space are inaccessible for people with sight loss even with low levels of cycle traffic - segregated provision for cycling and walking is essential
- There should be a physical demarcation between pedestrian areas and cycle tracks, such as a kerb, barrier or, where these are not possible, a raised tactile strip. A change in colour is also desirable, but a sign or a purely visual cue such as a white line alone will not be effective
- Where pedestrians would need to cross a new cycle lane, there must be adequate controlled crossings for people with sight loss to do this safely, particularly where cycle lanes affect access to bus stops or other public transport

- Where significant increases in cycle traffic are anticipated, existing crossing provision should be upgraded to allow pedestrians to cross safely

For more information, please contact

Guide Dogs - anne-marie.barry@guidedogs.org.uk

End of document