

## RNIB Scotland Response to the Scottish Government Cycling Framework and Delivery Plan for Active Travel in Scotland, December 2022

### Introduction

The Royal National Institute of Blind People (RNIB) Scotland is the country’s leading charity working with blind and partially sighted people. We support children and adults with sight loss and help them to live full and independent lives, campaigning for their rights.

At present there are around 183,000 people living with sight loss in Scotland. This figure is likely to increase over the next decade, with estimates suggesting there will be at least 214,000 people will be living with a visual impairment in Scotland by 2032.

Whilst cycling is not an option for blind and partially sighted people to get around, they do depend on high quality safe cycling infrastructure and actions which prioritise road safety for vulnerable users.

The way cycling infrastructure is designed and implemented has a very real impact on the ability for visually impaired people to get safely from A to B as a pedestrian or public transport user.

Often a degree of preparation and planning is involved before they can leave their home, including an assessment of whether they can make a journey on their own safely and easily. This may include things like knowing where accessible controlled crossings are, avoiding moving vehicles, and being able to navigate safely if using a long cane or guide dog. Challenges are presented when there is an over-reliance on visual cues to get around or way find. This includes negotiating with other street users, including cyclists and motorists, via visual gestures, as one person said in an RNIB Scotland report:

"If you’re blind, you can’t make eye contact. My local council wanted to get rid of the crossing, kerbs, and tactile paving, but I have been campaigning to keep them. Kerbs and tactile paving help me know when I’m approaching a road. They tell me where to stop, so I remain safe."[[1]](#footnote-1)

### Consultation Questions:

RNIB Scotland welcomes the opportunity to respond to the Cycling Framework and Delivery Plan for Active Travel. We support the aim to promote walking and cycling, to increase levels of healthy activity and the move to zero emission transport. However, it is necessary to ensure that all developments and schemes are designed inclusively.

We have focussed our consultation response to the key areas where there are implications or impacts for blind and partially sighted people.

### Framework and Delivery Plan Purpose

**The top priority for the achievement of our vision is for the delivery of more dedicated, high quality, safe cycling infrastructure, effectively resourced, where fair access is ensured, and uptake is supported with training and education.**

### Question 1. Do you agree with the above statement of strategic priorities for driving the development of cycling for transport in Scotland?

Partially - we do not want to say yes or no here.

Please comment below:

Cycling, including cycling infrastructure, cannot be viewed in isolation from other modes of transport and in general, the wider planning system.

Blind and partially sighted people are not against cyclists or cycling infrastructure. However, we have concerns about the way cycling infrastructure is being implemented, particularly when it encourages pedestrians and cyclists to share the same space. Blind and partially sighted people face real risks and challenges, where there is no clear physical separation between pedestrians and cyclists and in some cases may be actively avoiding these areas.   
  
Bus stop bypasses and bus stop boarders are examples of emerging cycling infrastructure which we have concerns about. These designs accommodate safer travel for cyclists so they don't have to stop and wait to overtake a bus on the carriageway when a bus is stationary at a stop. However, such bus stop designs have unintended consequences for blind and partially sighted people (and for other pedestrians).

For example, bus stop boarders require passengers either arriving at or alighting from a bus stop to cross an active cycle-lane to get to and from the bus stop from the footway. Whilst this may not sound challenging to some, for those with visual impairments, it is difficult to detect and identify an approaching cyclist.

In addition, there are often no obvious physical markers to separate the bus stop and pavement from the cycle lane. There is often an absence of detectable kerbs to distinguish between the cycle lane, footway, and bus stop. Some may use tactile paving as a separation marker. However, if tactile paving appears without any other distinguishing features such as a dropped kerb or an incline on the pavement to indicate a crossing point or road junction, it becomes effectively meaningless. [[2]](#footnote-2)

Research [[3]](#footnote-3) has consistently shown that a kerb height of at least 60mm is the only reliable marker for blind and partially sighted people to identify when a footway changes to a road or other surface. Long cane users, and guide dog owners are also reliant on this feature as a means of orientation and guiding.

Whilst the Cycling Framework is a blueprint to prioritise walking and cycling for planners and decision makers, infrastructure changes or developments must be inclusive to keep pedestrians as well as cyclists safe.

### Question 2. The diagram above sets out how the Cycling Framework is aligned to the wider policy context. Do you agree that this captures the key policy linkages and/or should any policy areas be added or removed?

Partially - we do not want to say yes or no here.

**Please comment below**

The diagram is a visual representation. Please note that as presented in the consultation papers, there is no alternative text or description. Ergo, it is inaccessible for those using screen reader technology.

As regards linkage to the wider policy context, RNIB Scotland welcomes the inclusion of the Accessible Travel Framework which sets out national outcomes towards realising outcomes for disabled people to make journeys, whether that is via walking, wheeling, public transport, etc. Annex A of the Cycling Framework states that:

"The Accessible Travel Framework has the vision that all disabled people can travel with the same freedom, choice, dignity and opportunity as other citizens. Equity of access to cycling, and ensuring that cycling infrastructure is not a barrier to disabled people, is central to this Cycling Framework."

However, to realise this vision, specific duties in the Equality Act, and as well as the Public Sector Equality Duty, should also be included, to highlight the important role agencies have in ensuring developments are inclusive for disabled people.

The Equality and Diversity Impact Assessment accompanying the Framework recognises that cycle policy and infrastructure must be specifically targeted towards underrepresented groups. However, there is a pressing need to recognise disabled people and people with long term conditions, given they make up 24 per cent of the population and are less likely to own or drive a car, compared to non-disabled people.[[4]](#footnote-4)

### Delivery Plan - Strategic Themes

### Question 3. Six strategic themes have been identified based on stakeholder feedback, as above. These themes illustrate the overarching approach for cycling for transport in Scotland. Do you agree with these strategic themes as priority areas for action in this framework?

Yes

Please comment below:

Please see more detailed comments within each of the six strategic themes as outlined in the questions below.

## Delivery Plan - Safe Cycling Infrastructure

We have combined our response to the three questions as laid out below for each of the strategic themes.

### Question 4. Do you have any comments on the substance of the delivery plan actions in this section?

### Question 5. Do you have any comments on the agencies identified to lead and support these actions?

### Question 6. Do you have any other comments on this section of the delivery plan?

Safe Cycling Infrastructure must take a coordinated approach and be implemented in a way to avoid disruption and confusion for other road users, including pedestrians.

The coronavirus pandemic created a unique set of circumstances which gave rise to increased walking and cycling in local areas.

Whilst some were able to take advantage of quieter streets, this was not the case across all groups of the population. Consequences for blind and partially sighted people included a reduction in independence and confidence in making walking journeys due to rapid changes in street layouts and physical environments.

Schemes such as "Spaces for People" used Temporary Road Orders (TROs) to make rapid alterations to street environments.

RNIB Scotland’s response to the City of Edinburgh Council consultation on retaining "Spaces for People" stated that:

"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. … 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 about 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." [[5]](#footnote-5)

RNIB Scotland believes that safe cycling infrastructure should allow for segregation between cyclists and pedestrians. Blind and partially sighted may not be aware of an oncoming cyclist, and therefore be unable to adjust their position. A cyclist may also unknowingly assume a pedestrian has seen them on approach so may not be aware that their presence is undetected. Near misses, anxieties or worries about cyclists travelling too close to pedestrians can be avoided if there are clear physical separators between cyclists and pedestrians. For example, detectable kerbs are more reliable features than painted white lines.

Where cycling infrastructure is created, we would like this to use existing space on the road/carriageway as opposed to allocating space from the existing footway/pavement. This includes associated infrastructure such as bicycle parking and space for cycle hire schemes, to avoid creating obstructions on the footway/pavement, which may be difficult for blind and partially sighted people to detect.

## Delivery Plan - Effective Resourcing

### Question 7. Do you have any comments on the substance of the delivery plan actions in this section?

### Question 8. Do you have any comments on the agencies identified to lead and support these actions?

### Question 9. Do you have any other comments on this section of the delivery plan?

Plans need to be well communicated, using accessible formats, and consultation methods made inclusive to encourage blind and partially sighted people to contribute and feed in their views.

Whilst comparable investment objectives have been set to bring Scotland in line with some of its continental counterparts, there are key differences. For example, countries like Finland have a long tradition of cycling, they have also invested in an accessible transport system, and the terrain is mainly flat. Investment in cycling infrastructure also comes with maintenance costs, such as clearing cycle-routes during periods of colder and snowy weather. Otherwise cycle lanes are rutted with snow and ice and become dangerous.[[6]](#footnote-6)

Consideration must be given to the wider context of maintenance and monitoring usage so there is equitable distribution of resources on all Active Travel Initiatives.

(See below Fair Access).

## Delivery Plan - Fair Access

### Question 10. Do you have any comments on the substance of the delivery plan actions in this section?

### Question 11. Do you have any comments on the agencies identified to lead and support these actions?

### Question 12. Do you have any other comments on this section of the delivery plan?

Around 24 per cent of Scotland’s population live with a long-term physical or mental condition that affects their everyday life.

This rises to 33 per cent in the most deprived areas of Scotland.

Disabled people have a wide variety of differing requirements and should not be considered as a single, uniform group. Evidence remains that most disabled people never cycle and many of them are more reliant on public transport, particularly bus travel.**[[7]](#footnote-7)**

Fair Access must also consider Equity of Access, with additional funding for inclusive models of cycles to suit disabled people, where they are proven to be effective. This may also include funding for projects which actively encourage and support disabled people to participate, as well as adaptive cycles, which often cost far more than a standard push bike.[[8]](#footnote-8)

Within the Cycling Framework there is an opportunity to consider how cycling can become more inclusive. Otherwise, there is a risk that vast swathes of the population will be excluded. Investment may only serve those where cycling is already a realistic option, which at present tends to be those in higher socio-economic groups.[[9]](#footnote-9)

There must be careful consideration of a range of issues involved, including the fact that most disabled people don't have access to a car - 39 per cent of disabled people compared to 19 per cent of non-disabled people. For most, travelling as a passenger in a car or taxi remains the only way to safely access amenities and services. **[[10]](#footnote-10)**

Whilst cycling is not a feasible option for blind and partially sighted to make regular journeys, there are some planned activities focused on leisure cycling. These take place mostly on quiet country roads and cycle routes and involve a sighted companion as well as adapted bike. It should also be noted that most of these activities are reserved for warmer weather, as opposed to winter months, and are organised as planned events as opposed to everyday routines.[[11]](#footnote-11)

## Delivery Plan - Training and Education

### Question 13. Do you have any comments on the substance of the delivery plan actions in this section?

### Question 14. Do you have any comments on the agencies identified to lead and support these actions?

### Question 15. Do you have any other comments on this section of the delivery plan?

RNIB Scotland believe responsible cycling comes down to education and training across all age groups. This includes promoting the importance of and compliance with the Highway Code, which is fundamental for responsible cycling (including other models such as cargo bikes, e-bikes, etc).

Blind and partially sighted people rely on other road users to follow the Highway Code.[[12]](#footnote-12) This code provides a basis on which all road users can interact with each other based on a mutually agreed set of rules and with sufficient margin of error to take account of variations in the way people are able to react.

We regularly receive complaints from blind and partially sighted people who have encountered a cyclist not following the Highway Code. The instances include running red lights, going over zebra crossings when a pedestrian is crossing, riding at excessive speed given the conditions, and riding on pavements. We do not agree with the argument that the risk of injury is low with this kind of behaviour. These arguments are not based on any formal analysis of the way this rule-breaking impacts on the confidence of disabled people to go out and make journeys that are just as important as those of other people.

Whilst it is not possible to mitigate against reckless and irresponsible behaviour all the time, these are measures which can help ensure Scotland’s streets are safer and more accessible, including:

* Mandatory training for every cyclist, including those hiring bikes or e-bikes.
* Working with the sight loss sector, to develop and roll out training and information, including visual awareness, for cyclists.
* Explore how cycles can be made more detectable to pedestrians (including visual and sound).

Adequate supply of fixed docking stations for cycle hire schemes so bikes don't obstruct the footway or pavement.

Where possible, space for docking stations and bicycle parking should be allocated from the road so they do not take up valuable space on the pavement/footway.

Guidance to ensure consistency across all hire schemes and rental arrangements would help to ensure they are used for their intended purposes and allow for their safe return to docking stations. Accreditation may also help ensure hire schemes adhere to certain standards before approval.[[13]](#footnote-13)

Enforcement measures, including fines and mandatory training for irresponsible cyclists.

## Delivery Plan - Network Planning

### Question 16. Do you have any comments on the substance of the delivery plan actions in this section?

### Question 17. Do you have any comments on the agencies identified to lead and support these actions?

### Question 18. Do you have any other comments on this section of the delivery plan?

Network planning requires careful consideration of accessibility, including specific duties laid out in the Equality Act 2010 [[14]](#footnote-14) and Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.[[15]](#footnote-15)

Segregated cycling infrastructure must be carefully considered. For example, bicycle parking facilities should not take up valuable space on footways/pavements.

Whilst cycle usage can help to achieve a reduction in car usage, other initiatives including more regular, accessible, and available public transport also has a key role to play.

An integrated transport network and travel system should work for everyone.

### Delivery Plan - Monitoring

### Question 19. Do you have any comments on the substance of the delivery plan actions in this section?

### Question 20. Do you have any comments on the agencies identified to lead and support these actions?

### Question 21. Do you have any other comments on this section of the delivery plan?

We would like to see robust monitoring of outputs in the Cycling Framework with ongoing review of initiatives aimed at groups of people less likely to take up cycling, including disabled people.

## Impact Assessments

### Question 25. Do you have any comments on the draft Social and Equalities Impact Assessment?

Whilst cycling is presented as an alternative to using a car for solo journeys, it should also be acknowledged that regardless of the provision of cycling infrastructure, there are some instances where cycling is not an option.

Blind and partially sighted people often rely on travelling as a passenger in a car or taxi, due to lack of public transport and/or because access is restricted in some other way. This is particularly the case in rural and remote locations, where getting to public services or key amenities is only possible via car.

Accessible parking bays and drop off/pick up points for cars and taxis are important in enabling disabled people access to key local amenities and services.

Disabled people face a multitude of barriers in everyday life. For blind and partially sighted people making independent walking journeys, remains one of the most accessible ways to get physical exercise. An RNIB Report found seventy-eight per cent of blind and partially sighted people said walking journeys were their only, or main, form of outdoor physical exercise.[[16]](#footnote-16) Walking is also of key importance to access services and amenities close to where they live. This relies on safely navigating the streets, maintaining safety, and avoiding moving vehicles and street clutter.

RNIB Scotland are keen to engage with cycle advocates, planners, designers, and engineers to explain the issues and to identify solutions to the current problems and welcome the opportunity to discuss any issue covered in this consultation response.

Island Communities Impact AssessmentTop of Form

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## About you

#### What is your name?

Catriona Burness, Parliamentary and Policy Manager, RNIB Scotland

Kirstie Henderson, Policy Officer, RNIB Scotland

#### What is your email address?

[catriona.burness@rnib.org.uk](mailto:catriona.burness@rnib.org.uk)

[kirstie.henderson@rnib.org.uk](mailto:kirstie.henderson@rnib.org.uk)

#### Are you responding as an individual or an organisation?

Organisation

#### What is your organisation?

Royal National Institute of Blind People (RNIB) Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

**Information for organisations only:**

The option 'Publish response only (without name)' refers only to your name, not your organisation’s name. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Transport Scotland teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so.

**Are you content for Transport Scotland to contact you again in relation to this consultation exercise?**

Yes

**I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.**

Yes

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1. Scotland: Street Charter toolkit, Part of our "Who put that there" campaign (RNIB Scotland, 2015) available on request from RNIB Scotland. [↑](#footnote-ref-1)
2. Inclusive Mobility, Department for Transport (2021), available at: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3695/inclusive-mobility.pdf> [↑](#footnote-ref-2)
3. Effective Kerb Heights for Blind and Partially Sighted People Research Commissioned by The Guide Dogs for the Blind Association (Childs et al, 2009) available at: <https://www.ucl.ac.uk/civil-environmental-geomatic-engineering/sites/civil-environmental-geomatic-engineering/files/steps_project_for_guide_dogs_association.pdf> [↑](#footnote-ref-3)
4. Disability and Transport Findings from the Scottish Household Survey, available at: <https://www.transport.gov.scot/media/50099/disability-and-transport-findings-from-the-scottish-household-survey-july-2021.pdf> [↑](#footnote-ref-4)
5. RNIB Scotland Response to City of Edinburgh Council Consultation on "Retaining Spaces for People", April 2021), available at: <https://www.rnib.org.uk/documents/962/Consultation_on_Retaining_Spaces_for_People_.docx> [↑](#footnote-ref-5)
6. Guardian, 7 February 2020, "[Winter wheelies: Finland blazes trail in keeping citizens cycling and healthy" available at:](https://www.theguardian.com/world/2020/feb/07/finland-blazes-trail-in-keeping-citizens-cycling-and-healthy)  <https://www.theguardian.com/world/2020/feb/07/finland-blazes-trail-in-keeping-citizens-cycling-and-healthy> [↑](#footnote-ref-6)
7. Scottish household survey 2019: key findings: available at: <https://www.gov.scot/publications/scottish-household-survey-2019-key-findings/documents/> [↑](#footnote-ref-7)
8. Guide to non-standard cycles for inclusive cycling (Cycling UK, 2019, webpage): <https://www.cyclinguk.org/article/cycling-guide/guide-to-adapted-cycles> [↑](#footnote-ref-8)
9. Annual Cycling Monitoring Report (Cycling Scotland, 2022): <https://www.cycling.scot/mediaLibrary/other/english/Annual_Cycling_Monitoring_Report_2022.pdf> [↑](#footnote-ref-9)
10. Disability and Transport Findings from the Scottish

    Household Survey, available at: <https://www.transport.gov.scot/media/50099/disability-and-transport-findings-from-the-scottish-household-survey-july-2021.pdf> [↑](#footnote-ref-10)
11. Talking Tandems homepage available: <http://www.talkingtandems.org/> [↑](#footnote-ref-11)
12. The Highway Code, Rules for Cyclists available at: <https://www.gov.uk/guidance/the-highway-code/rules-for-cyclists-59-to-82> [↑](#footnote-ref-12)
13. Public Bike Share Accreditation Criteria (CoMoUK: (points to use of docks and parking): <https://uploads-ssl.webflow.com/60f6952e8542ba18aa258546/62f66feb6e00bc234db89b90_CoMoUK%20Public%20Bike%20Share%20Accreditation%20Criteria%202022.pdf> [↑](#footnote-ref-13)
14. The Equality Act 2010: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [↑](#footnote-ref-14)
15. The Equality Act 2010 (Specific Duties) (Scotland)

    Regulations 2012: <https://www.legislation.gov.uk/ssi/2012/162/pdfs/ssi_20120162_en.pdf> [↑](#footnote-ref-15)
16. Seeing Streets Differently Report (RNIB, 2021) available at: <https://www.rnib.org.uk/get-involved/support-a-campaign/inclusive-journeys/seeing-streets-differently-report/> [↑](#footnote-ref-16)