# RNIB Scotland Response to the City of Edinburgh Council City Mobility Plan consultation

### Introduction:

RNIB Scotland welcomes the opportunity to respond to the City of Edinburgh Council’s City Mobility Plan. As 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.

While targets are being set to achieve zero-emission transportation and encourage healthy activities, such as walking and cycling, it is imperative Edinburgh’s streets are safe and accessible for everyone, including people with sight loss.

The priorities identified in City of Edinburgh’s City Mobility Plan consultation are ambitious. However, due to the specific and localised nature of questions in the document, we have restricted our response to Question 27 in the consultation. Ergo, RNIB Scotland is not submitting an online response to this consultation, given the individualised nature of questions posed.

Our consultation response draws heavily on our recently published report, “Street Credibility; making Scotland’s streets accessible for sight loss”.[[1]](#footnote-1) The Street Credibility report outlines various challenges which blind and partially sighted people continue to face amidst continuing and rapid alterations to streets and public spaces. The report also sets out recommendations based on three key principles which visually impaired people highlight as key to making independent walking journeys:

1. Reducing the hazard of cluttered pavements and street clutter
2. The importance of having kerbs and signalised controlled crossings
3. Avoidance of moving vehicles.

Should you wish to discuss any of these issues please contact RNIB Scotland on the contact details at the end of this document.

### Consultation question

### Question 27:

### Are there any other measures that you think we should consider helping achieve a net zero city by 2030 and meet our ambitious target to lower the number of kilometres travelled by car in Edinburgh by 30%?

### Are there any of the measures proposed where you have concerns about the potential impacts?

### Any other comments?

We have summarised our response under question 27, using under the four headings below which are linked to some of the priorities and proposals detailed in the consultation documents:

1. [Making streets more accessible](#makingstreetsaccess)
2. [Delivering a joined-up cycle network](#_Delivering_a_joined-up)
3. [Car parking/traffic and electric vehicles](#_Car_parking/traffic_and)
4. [Delivering improvements to our public transport network.](#_Delivering_improvements_to)[[2]](#footnote-2)

### “Making streets more accessible”

“Making streets more accessible” is a key aim covered in this consultation. The consultation gives definitions of how streets can be made accessible. Respondents are asked to rate these in order of priority.

Clear, unobstructed pavements are essential to enable blind and partially sighted people to navigate streets and public spaces independently and with confidence. They also depend on detectable kerbs and signalised controlled crossing points to keep them safe and avoid moving vehicles, including cycles, cars and buses. Often a degree of planning and preparation is required before a person with sight loss can undertake any walking journey independently. When routes are changed or altered rapidly, they can experience great anxiety.[[3]](#footnote-3)

RNIB Scotland’s “Street Credibility” Report [[4]](#footnote-4), highlights the significant role local authorities have in ensuring there are consistent design features. There must be sustainable solutions and accessible features embedded from the outset in designs and proposals. Consistent standards should be set from the beginning to avoid the need for costly repairs and a random approach.

Visually impaired Edinburgh residents have told us about areas where accessible features have sometimes been an afterthought. For example, we received complaints about new features including pavements continuing over road junctions on Leith Walk (so-called “continuous footways”), with no detectable features such as crossing points or kerbs to signal it is a road junction. Tactile paving is now being laid down to mark the continuous footways. However, the results so far are haphazard. The use of tactile paving must adhere to guidance to be a reliable and consistent feature.[[5]](#footnote-5)

### Delivering a joined-up cycle network

In the consultation document and overarching plans there are references to cycling as a mode of transport, including:

“Our vision is that everyone will feel safe to make cycling a natural choice for local and longer trips around the city.”

Cycling for everyday trips around the city is not an option for blind and partially sighted people to get around. However, they do depend on having high quality safe cycling infrastructure and actions which prioritise road safety for vulnerable users.

RNIB Scotland believes that safe cycling infrastructure should allow for segregation between cyclists and pedestrians. 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 such as a kerb between the pavement and cycle lane. Research has shown that a kerb height of at least 60mm is the minimum detectable marker for blind and partially sighted people to identify when a footway changes to a road or other surface.[[6]](#footnote-6) Long cane users and guide dog owners are reliant on kerbs as a means of orientation and guiding.

Designs such as the bus stop bypasses and bus stop boarders emerging in parts of Edinburgh (and elsewhere) cause anxiety for blind and partially sighted people.

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.

In a bus stop bypass, a segregated cycle lane, or track, continues through the bus stop area behind the shelter thereby creating an island for bus passengers boarding and alighting at the stop. It requires a crossing for pedestrians to access the island across the cycle track.

These designs accommodate safer travel for cyclists, so they do not 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).

It can be difficult for visually impaired people to detect the direction of travel of oncoming cyclists due to lack of sound. In addition, cyclists may assume a pedestrian has detected their presence, and can adjust their position to avoid collisions, which is not always the case for a person with sight loss.

If there are no obvious physical markers to separate the bus stop and pavement from the cycle lane such as detectable kerbs, it becomes extremely difficult to tell where the pavement ends, and the cycle lane begins. Sometimes tactile paving is used 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 meaningless.

Allocating space for associated cycling infrastructure, including bicycle parking and cycle hire schemes, from the road or carriageway is also better than taking up valuable space from the existing pavement. This helps to create clear pavements, in turn reducing the risk of accidents or injuries which people with sight loss often fear when navigating public spaces.

### Car parking/traffic and electric vehicle charging points:

Question 18 in the consultation document asks respondents to rank in order of preference moves to reduce kerbside parking within the city centre to provide a more welcoming environment for everyone.

Within the City Mobility Plan there is further information on limiting parking in new developments (see quote below):

“Parking in New Developments - Limit the level of parking in new developments based on current and planned levels of walking/wheeling, cycling and public transport access and the capacity of surrounding streets, and include requirements for electric vehicle charging, disabled persons parking places, car club and bike hire space.”

Blind and partially sighted people are unable to drive, so for journeys beyond walking distance they rely on public transport, taxis and lifts in vehicles from friends or relatives.

Adequate numbers of accessible parking spaces as well as drop off and pick up points near essential services must be available in new and existing developments.   
  
Kerbside parking as well as other accessible parking space, is crucial for blind and partially sighted people particularly if they require sighted assistance to and from a vehicle to the entrances of destinations.

The consultation document goes on to state that the council may introduce restrictions in some Edinburgh streets to reduce traffic:

“As we continue to prioritise walking, wheeling and cycling in the city centre, we want to identify further streets where we could reduce or remove through traffic. Any restrictions would still allow essential vehicle movements such as access for city centre residents, to multi-storey car parks, and access for deliveries and blue badge parking.”

There must be consultation with local people on the potential impacts of vehicle restrictions in streets. These may include increased pressures for car parking elsewhere or diversions through quieter streets.

Travelling as a passenger in a car or taxi remains the only means of transport for some blind and partially sighted people to safely access amenities and services. Therefore, restricting traffic altogether on certain streets of Edinburgh may only serve to exclude people with sight loss further.

In addition to parking requirements, there is a need to carefully examine where electric vehicle charging points will be located as the need for them increases. This includes consistent standards so that charging points do not create footway obstructions. Cables trailing from vehicles to charging points across footways are a trip hazard and must also be avoided.

RNIB Scotland welcomes the enactment of Scotland’s pavement parking ban, which is due to come into effect towards the end of this year. We hope adequate resources will be made available to ensure compliance across the City, so that motor vehicles do not create unnecessary obstructions on the pavements.

The provision of accessible, reliable and affordable public transport including bus stops close to key services is vital to reduce reliance on private vehicles (see points raised below).

### Delivering improvements to our public transport network

As stated in the consultation document, there is a need to review the city’s bus network to better align with the Council’s strategic priorities including improving accessibility, integration and reducing congestion in the city centre.

This also includes measures such as access to bus stops, locations and other infrastructure.

For blind and partially sighted people, travelling independently is a critical factor in improving their quality of life and achieving a sense of autonomy. However, using public transport can prove to be a daunting experience for people with sight loss.

As Edinburgh sees its public transport network upgraded, including the extension of tram lines, there must be consistent application of accessibility features, including tactile paving at stops, which follows guidance.

In a recently published RNIB report on the accessibility of public transport for people with sight loss in the UK over half found it difficult to navigate public transport facilities.[[7]](#footnote-7)

This research also found that buses remain the most popular mode of transport amongst blind and partially sighted respondents.

When asked if there was anything stopping them from being able to use public transport as much as they wanted to, those who said “yes” mentioned the following issues:

* 17 per cent said public transport runs too infrequently;
* 16 per cent said it was due to a lack of accessibility such as bus numbers not being clearly displayed;
* 15 per cent said they lacked confidence;
* 11 per cent said they were unable to go out alone as they needed some form of assistance;
* Nine per cent found it difficult getting to public transport (bus stop);
* Nine per cent said it was due to a lack of specialist support on some transport operators.

Participants had an option to provide further detail around the challenges and the most popular answer was concern about boarding and disembarking transport followed by unclear visual information (too high up, too small or scrolling too quickly).

Other responses included difficulty navigating through crowded areas, unexpected layout changes, lack of help provided by staff and public and a lack of available disabled seating/space for guide dogs.

When asked if there was anything else that would help them have a better experience when using public transport, the most popular answer was more reliable transport services, better assistance from staff and individuals having more confidence when travelling.

While more than half of participants (65 per cent) were able to make the journeys they wanted or needed to using public transport, 35 per cent of participants said they were unable to make such journeys.

Locations of bus stops are crucial as this quote from the report highlights:

“It is a quarter of a mile to walk to the bus stop and if I were on my own, I would feel vulnerable and I would definitely not go on my own at night.”

Access to real-time information when travelling is critical – not just for delays and updates but also to establish which bus is approaching, exactly where they are at any point in time, and when they should be getting off.

There is a need for environments and transport modes to incorporate best practice in accessibility such as:

* Physical features such as tactile paving, detectible kerbs, handrails, lifts, clear routes, step-free access;
* Visual clarity: Clear signage and markings, colour contrast;
* Audio design: Accurate, frequent, and clear audio announcements on buses and trains.

Bus driver training and awareness of how to make journeys easier and safer for people with sight loss is another example.

RNIB Scotland, in partnership with Lothian Buses, run a series of ‘Swap with me events’ amongst trainee bus drivers. These have been a successful in raising awareness and improving the experience of blind and partially sighted bus people travelling on Lothian Buses. The partnership also recently won an award. [[8]](#footnote-8)

Going forward, the City of Edinburgh Council has a role in ensuring bus and coach operators provide routes which are not just commercially viable but also socially necessary.

The surrounding regions of Lothian, Fife and the Scottish Borders also require frequent and affordable busservices into Edinburgh so people can travel for work, education, healthcare and other essential services.

Getting around our streets is a fundamental aspect of our daily lives, whether it is for transportation, taking care of our health, or visiting friends and family. However, for blind and partially sighted people, navigating streets can be a challenge. As we strive towards zero-emission transportation and encourage healthy activities, such as walking and cycling, it is imperative we keep Edinburgh’s streets safe for everyone, including those with sight loss.

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1. Street Credibility – making Scotland’s streets accessible for sight loss, PDF available from website (RNIB Scotland: 12 May 2023): [RNIB Scotland calls for Street Credibility | RNIB](https://www.rnib.org.uk/news/rnib-scotland-calls-for-street-credibility/) [↑](#footnote-ref-1)
2. Available via online consultation portal here: [Actions to deliver Edinburgh’s City Mobility Plan - City of Edinburgh Council - Citizen Space](https://consultationhub.edinburgh.gov.uk/sfc/cmp/) but provided as a Word document following contact to [spatial.policy@edinburgh.gov.uk](mailto:spatial.policy@edinburgh.gov.uk) on 02062023. Online link to consultation [↑](#footnote-ref-2)
3. Inclusive Journeys: improving the accessibility of public transport for people with sight loss: (RNIB: 18 April 2023) research report available at: <https://www.rnib.org.uk/professionals/health-social-care-education-professionals/knowledge-and-research-hub/reports-and-insight/inclusive-journeys-improving-the-accessibility-of-public-transport-for-people-with-sight-loss/> [↑](#footnote-ref-3)
4. Street Credibility – making Scotland’s streets accessible for sight loss, PDF available from website (RNIB Scotland: 12 May 2023): [RNIB Scotland calls for Street Credibility | RNIB](https://www.rnib.org.uk/news/rnib-scotland-calls-for-street-credibility/) [↑](#footnote-ref-4)
5. [Guidance on the Use of Tactile Paving Surfaces (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1046126/guidance-on-the-use-of-tactile-paving-surfaces.pdf) [↑](#footnote-ref-5)
6. Effective Kerb Heights for Blind and

   Partially Sighted People (Childs et all, 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-6)
7. Inclusive Journeys: Improving the accessibility of public transport for people with sight loss (RNIB, 2023) available at: [Inclusive Journeys: Improving the accessibility of public transport for people with sight loss | RNIB](https://www.rnib.org.uk/professionals/health-social-care-education-professionals/knowledge-and-research-hub/reports-and-insight/inclusive-journeys-improving-the-accessibility-of-public-transport-for-people-with-sight-loss/) [↑](#footnote-ref-7)
8. <https://www.lothianbuses.com/news/2023/06/lothian-wins-at-scottish-transport-awards-2023/> [↑](#footnote-ref-8)