

## RNIB Scotland response to the Scottish Government consultation on the Local Living and 20-minute Neighbourhoods: draft planning guidance

### Introduction

RNIB Scotland welcomes the opportunity to respond to the Scottish Government consultation on the Local Living and 20-minute Neighbourhoods draft planning guidance. 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.

Around 178,000 people live with a significant degree of sight loss in Scotland, around 4,300 of which are children and young people. This number could eventually double because of increased rates of sight threatening conditions such as diabetes and an ageing population.

Blind and partially sighted people often need to go through planning and preparation before they can leave their home. This includes an assessment of whether they can navigate safely and easily to destinations they need to travel to.

As Scotland’s cities, towns, and villages continue to change, it is essential to ensure that the increased pace and scale of changes does not exclude accessibility. Rapid alternations to streets and public spaces present challenges for people with visual impairments.

### Consultation questions

RNIB Scotland’s consultation response focuses on key issues which have been highlighted in previous consultation responses, external reports, and findings from RNIB research. We have answered questions 1, 2, 3 and 9.

### Question 1

How helpful is Part 1 of the guidance to further the understanding of local living and 20-minute neighbourhoods in a Scottish context?

Somewhat helpful.

Please explain your response explaining what else could be helpful:

Although the consultation document recognises that there will be sufficient scope to interpret 20-minute neighbourhoods within the planning process, we are concerned by the definitions used (see inserted below):

“The 20-minute neighbourhood concept is one method of supporting local living … it continues:

“The 20-minute neighbourhoods concept aims to provide access to the majority of daily needs within a 20-minute walk, wheel or cycle.”

The 20-minute neighbourhood concept cannot apply consistently across Scotland. Factors including age (and needs arising from age such as education, work or health and social care) are not consistent. Environmental factors including rurality, and accessibility of the streets, availability of services and amenities, including public transport, all vary dramatically across the country.

Rigid adherence to a 20-minute neighbourhood would be highly unrealistic for most people with sight loss. Inclusive street design and availability of accessible and reliable public transport have a key bearing on how easy it is for them to safely and easily navigate to where they need to go on a daily basis.

RNIB Scotland agrees with the view expressed at Alliance-hosted events that 20-minute neighbourhoods would be difficult to realise in every community across Scotland due to Scotland’s geography. This concept lends itself to a city/urban context rather than a rural one. We also agree with the view that there must be links between neighbourhoods, particularly when this involves connecting outlying areas to urban centres where crucial public services may be based. [[1]](#footnote-1)

Inter-connectedness between key public services such as shops, services, public transport and health services must inform plans and developments. As the Alliance event recommended, RNIB Scotland would welcome joined up approaches to make sure there is “interconnectedness” between key public services such as, businesses, public transport, and health centres. [[2]](#footnote-2) Full consideration should also be given to the range of public realm access and mobility needs experienced by people with sight loss.

### Question 2

Please refer to the Local Living Framework Diagram on page 19 of the guidance. How helpful is the framework diagram in encouraging flexible, place-based approaches to support local living?

Not very helpful.

The diagram on page 19 of the consultation document refers to The Place Standard Tool which is a visual representation. The specific nature of this tool uses text within a diagram with images and colours to represent five categories and 14 themes.

This diagram is not accessible to most blind and partially sighted people. Alternative text and descriptions would help to make images, charts and diagrams accessible to those who use screen-reading software.

### Question 3

Looking at part 2 of the draft guidance: how helpful are the ‘categories’ and ‘key considerations for local living’ that are captured within this part of the document?

Somewhat helpful.

We are already aware of increased demand on space in the public realm, mostly fuelled by national targets to reduce CO2 emissions as well as the desire to encourage more walking and cycling as modes of transport, particularly for shorter journeys.

Rapid alterations to streets and public spaces have a disproportionate effect on blind and partially sighted people, who may have to re-learn routes or deal with unexpected obstacles or dangerous diversions. Safety can be severely compromised when kerbs are flattened and when there is less physical separation between pedestrians and moving vehicles.   
  
RNIB Scotland’s recent report, “Street Credibility: making Scotland’s streets accessible for people with sight loss”, highlights the hazards and difficulties faced by blind and partially sighted people.[[3]](#footnote-3) It covers three key recommendations which visually impaired people have consistently said must apply for spaces to be inclusive, that is:

1. Reducing the hazards of cluttered pavements;

2. Importance of signal-controlled pedestrian crossings and detectable kerbs;

3. Avoiding moving vehicles.

Emerging features in street planning are having a very real impact on whether visually impaired people can get safely from A to B as a pedestrian or public transport user. This includes cycle-lanes and associated infrastructure including bicycle parking.

RNIB Scotland recommends having adequate segregation between cycle-lanes and pavements, including detectable kerbs which act as a reliable indicator for blind and partially sighted people to remain safe when walking.

Research has 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. [[4]](#footnote-4) Long cane users, and guide dog owners are reliant on this feature as a means of orientation and guiding.

Clear uncluttered pavements are also essential to enable blind and partially sighted people to navigate safely. Given the need for more electric vehicle (EV) charging points, there must be minimum standards to ensure that EV charging outlets do not occupy vital space on footways/pavements and crossing points. The positioning of extended electric cables should also be considered to avoid presenting trip hazards.

### Question 9

Looking at the impact assessment update report: do you have any views about the initial conclusions of the impact assessment update report that accompany and inform this guidance?

### Disability

The [Integrated Impact Assessment Society and Equalities Impact Assessment (www.gov.scot)](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.scot%2Fbinaries%2Fcontent%2Fdocuments%2Fgovscot%2Fpublications%2Fimpact-assessment%2F2021%2F11%2Fscotland-2045-scotlands-fourth-national-planning-framework-draft-integrated-impact-assessment-society-equalities-impact-assessment%2Fdocuments%2Fintegrated-impact-assessment-society-equalities-impact-assessment%2Fintegrated-impact-assessment-society-equalities-impact-assessment%2Fgovscot%253Adocument%2Fintegrated-impact-assessment-society-equalities-impact-assessment.pdf&data=05%7C01%7CCatriona.Burness%40rnib.org.uk%7C72c3c0f97e9642e548ab08db8798b179%7C5d45337cd19243fcaa5805557c9171bc%7C0%7C0%7C638252862392023368%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=KepWRgh0lEfHJhOn%2BNsmuDGBSVlhyP9xUBKgceul6NI%3D&reserved=0) accompanies the draft planning guidance. We specifically reference points on Disability, using the sub-headings below:

* Need for accessible information and consultations
* Diversity of needs within 20-minute guidance
* Public transport
* Conclusion

#### Need for accessible information and consultations

We fully support the need to provide accessible information, including making available alternative formats such as Braille, large text and audio. The provision of information in alternative languages is also welcome.

Blind and partially sighted people consistently tell us that lack of accessible information and communication excludes them from public consultations. One respondent to an RNIB survey stated: “I never heard about it until someone told me they’d had a letter through the post but by then the consultation had closed.”

It would be helpful if the local living and 20-minute neighbourhood planning guidance made explicit reference to the need for accessible information and communication.

#### Diversity of needs within 20-minute guidance

We also fully support measures to include diverse needs, including the importance of including equality groups who will need to travel and access suitable support and social activities, guidance must:   
“not just to focus on people living and working in a particular place … and the need to travel will need to take into account that some equalities groups will need to travel to access suitable support and social activities.”

Blind and partially sighted people may have networks and support which goes beyond their immediate neighbourhood and a 20-minute journey and could entail travel to places where they can meet and gain support, therefore Connectivity is a key consideration (see more below).

#### Public transport

Whilst the local living and 20-minute neighbourhood planning guidance supports a range of themes, crucially there is a need to highlight that “increased availability of accessible and inclusive transport and services” are vital for disabled people including those with sight loss to participate.

We fully support the premise of Connectivity described in the impact report, particularly with reference investment in public transport, and “an integrated public transport system that is affordable, available and accessible for everyone”.

Recently published RNIB research on the accessibility of public transport for people with sight loss in the UK over half found it difficult to navigate public transport facilities. [[5]](#footnote-5)

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.

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.

Regardless of place or location, people with visual impairments, must be able to travel in and around locations safely and with ease.

Acknowledgement of the crucial role of accessible and reliable public transport in realising local living and 20-minute neighbourhoods must be laid out in guidance.

#### Conclusion

While we recognise planning guidance is there to act as a benchmark as opposed to directing the details of plans and schemes, there must also be an informed understanding of the distinct needs of blind and partially sighted people. This will help to improve designs at the development stage and help avoid lengthy public consultations and expensive retrofitting accessible features at later stages.

### Contact details

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1. Exploring Scotland's 20 minute neighbourhoods: The Alliance, Event Report (June 2022) available at: <https://www.alliance-scotland.org.uk/blog/news/exploring-scotlands-20-minute-neighbourhoods-final-report-published/> [↑](#footnote-ref-1)
2. Ibid. [↑](#footnote-ref-2)
3. Weblink to news item: [RNIB Scotland calls for Street Credibility | RNIB](https://www.rnib.org.uk/news/rnib-scotland-calls-for-street-credibility/) [↑](#footnote-ref-3)
4. 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-4)
5. 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-5)