

### RNIB Scotland Response to the Employment and Fair Work Committee – Call for views on new realities of retail and e-commerce in Scotland

### 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.

In 2010, the date of the most recent figures published by the Scottish Government, the number of people registered as blind or partially sighted in Scotland was reported to be 34,492. [[1]](#footnote-1) Research suggests that around 10 per cent of eligible people do not register making the true figure closer to 40,000.

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 unless we act to prevent avoidable sight loss. The rise of sight threatening conditions such as diabetes and an aging population will increase the number of people affected by sight loss unless action is taken.

RNIB Scotland welcomes the opportunity to respond to this call for views. To highlight key points relating to sight loss we have replied to Questions 1 and 3 in the section ‘Keeping town centres alive’ and to Question 1 in the section ‘E-Commerce activity in Scotland’. The replies are based on previous RNIB/RNIB Scotland surveys, public consultation responses, literature review and some consultation for the call for views.

### RNIB Scotland responses

### Keeping town centres alive

#### 1. How are Scottish high streets and town centres changing? What are the strengths and weaknesses of Scotland’s town centres?

The Scottish Parliament Economy and Fair Work Committee is conducting an inquiry into Scotland’s town centres and retail. This is considering the current condition of Scotland’s town centres, particularly following Covid-19, looking at new realities for Scottish retail, with a focus on e-commerce activity and innovative ways to keep town centres alive.

The Scotsman recently reported figures from the Scottish Retail Consortium (SRC) showing that footfall in Scotland’s shops dropped by 21.1 per cent in March 2022. Due to the pandemic forcing many retail locations to bounce between opening and closing, the SRC data compared March 2022 figures with pre-pandemic data from 2019. The Scottish decline is worse than the UK average decline of 15.4 per cent, with Scotland seeing the steepest decline in footfall for all nations in the UK.[[2]](#footnote-2)

In December 2020 the Scottish Parliament Information Centre (SPICe) highlighted the growth in online shopping and its policy implications. Almost nine in ten adults (87%) were shopping online in the UK compared to just 53% of adults in 2008. The onset of COVID-19 accelerated the surge to online shopping creating a range of issues for Scottish policy makers to grapple with and SPICe concluded that the statistics relating to the retail sector painted ‘a bleak picture for many of Scotland’s high streets, which were already struggling pre-COVID’. [[3]](#footnote-3)

The title of the call for views refers to ‘new realities’ of retail and e-commerce in Scotland. It seems clear that some, at least, of the decline in commercial activity in our high streets and town centres is due to factors that are permanent and ongoing – particularly the growth in online shopping. Hence, we can expect less of a role for some types of conventional high street retailing. High streets need to respond by developing as social spaces, providing a safe and attractive environment where people can combine shopping, socialising and access to leisure and entertainment facilities. This can be facilitated by street design and traffic management measures that prioritise safe and congenial spaces for pedestrians, promote active travel (walking, wheeling, and cycling) And give less priority to private vehicle use - but compensated with better access via improved public transport.

Present arrangements that have developed to prioritise motor vehicle access over other road users disadvantage large swathes of the population and discourage or exclude many from enjoying access to - and providing business for - high street facilities, and this is especially the case for blind and partially sighted people as well as many other disabled and disadvantaged citizens. As one blind person told us:

“Getting to shops can be very difficult for people with sight loss. Taxis can’t get near to drop off or pick up; bus stops are often some distance away and can be moved with no warning.”

Accessibility will be key to encouraging blind and partially sighted people to return to the high streets. Prior to the pandemic the streetscape was already challenging for people with sight loss as was travel by public transport and having accessible information. Our replies to Questions 1 and 3 in the section ‘Keeping town centres alive’ focus on the importance of inclusive and accessible street design and on access to public transport and the reply to Question 1 in the section ‘E-Commerce activity in Scotland’ on accessible information and websites.

Simply leaving home presents challenges for people with sight loss. When pavements or walkways are cluttered, or obstructed, this can make independent walking journeys harder or impossible. A survey RNIB ran in 2015 showed that 95 per cent of blind and partially sighted people have collided with an obstacle in their local neighbourhood over a three month period, and that nearly a third of those were injured.[[4]](#footnote-4) New features on pavements and walkways – such as dockless hire vehicles and the spread of electrical vehicle charging points – are now further adding to the existing problems caused by obstructions like advertising boards and vehicles parked on pavements.

RNIB Scotland campaigns for accessible street infrastructure - amongst other areas – focusing on three main design asks:

1. Include physical delineation in the form of kerbs at least 60mm high where the road use changes, for example, between cycle paths and roads, roads and pavements and pavements and cycle paths.
2. Install controlled crossings with audible and tactile signals so that people with sight loss know when it is safe to cross.
3. Ban shared spaces - areas where cars, cyclists and pedestrians share the same space with the intention that all street users will be more aware of their surroundings and move more carefully.

Before the 2020 lockdown, City Deal funding across Scotland, and Transport Scotland's commitment to increasing levels of cycling and walking for transport and leisure, aimed to transform Scotland's streetscape.

Further changes to street layouts were made during the pandemic under the Spaces for People initiative to enable people to physically distance whilst moving around the streets. Cabinet Secretary for Transport, Infrastructure and Connectivity Michael Matheson invited Scottish local authorities to take advantage of traffic-free streets to introduce additional cycle-lanes or expand existing ones.

RNIB Scotland recognised the emergency nature of the situation and so welcomed the Spaces for People initiative to enable people to physically distance. However, we expressed concern that the new street layout arrangements might effectively extend lockdown for blind and partially sighted people. Feedback from our service users confirmed that they found the new arrangements challenging. A 2020 RNIB survey found that 66 per cent of people surveyed said that they feel less independent than they did before the COVID-19 pandemic.

Along with other Scottish sight loss charities we wrote to the Cabinet Secretary identifying 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 - including assertive mid-pavement positioning of A-boards;
* Concern over pavement café sprawl;
* Increased numbers of proposed floating bus stops and bus boarders alongside temporary cycleways;
* The increased appearance of temporary and permanent traffic management bollards in unexpected locations.
* 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;
* Potential E-scooter rental trials;
* General failure to prioritise pedestrian movements, let alone pedestrians with disabilities including sight loss.

When asking for views to add to this consultation response we received a comment that:

“There had been a lack of consultation prior to implementation of Spaces for People initiatives and an unwillingness to acknowledge any faults or flaws post-installation.”

At the present time some Spaces for People schemes have been dismantled but other local authorities are retaining the schemes for a further 18-month period. As we move out of coronavirus restrictions visually impaired people will have to familiarise themselves with new layouts with increased pressure on visual rehabilitation and mobility training services.

Coronavirus impacted on everyone’s lives, but the pandemic had significant consequences for blind and partially sighted people.

For instance, access to groceries was an immediate problem highlighted by our helpline with RNIB’s services receiving an average of over 100 calls a day on this issue. Our 2020 survey on the impact of the pandemic

found that social distancing is near-impossible for many blind and partially sighted people, while inaccessible signage and fears about how the public reacted to them caused additional stress and worry. We pressed for and welcomed confirmation from the Scottish Government that people with sight loss could be guided by someone outside their household. [[5]](#footnote-5)

The points relating to access to shopping and social distancing will be overtaken as coronavirus restrictions are eased but the psychological legacy may last much longer.

It’s important for people to have choice and control of their lives to prevent isolation and loneliness. Without choice, blind and partially sighted people may be left stuck at home. For example, all too frequently a venue may be accessible, but the environment outside is not. This makes it extremely difficult for people with a visual impairment to access spaces, therefore resulting in social isolation and a need to stay at home due to environmental dangers, as a man with sight loss told us:

“People with sight loss don’t go out due to many reasons but one of them is clutter and danger. Not all crossing points are safe, with general directions to a venue on Google Maps or on the venue website, unclear about access for people who are visually impaired.”

Putting accessibility at the centre of reviving the high streets is essential.

So too is access to public transport.

‘Local Vision’, RNIB Scotland’s manifesto for the 2022 Scottish local elections highlights the importance of accessible travel.

‘“All I want is a transport system that works for me. To be able to know the stops on my bus journey without relying on strangers, travel with ease on trains without worrying about opening the wrong door. To travel with independence and equality. So, I can go about my daily life the same as anyone else.” (Kirin, Edinburgh).

‘Accessible travel is vital in allowing individuals with sight loss to maintain independence and mobility.

‘But Transport Scotland’s recent finding from the Scottish Household Survey (2021) showed that disabled people are generally less positive about their experiences on buses and trains than non-disabled adults. This is particularly significant for blind and partially sighted people, as they rely heavily on public transport.

‘In order to be truly accessible, the needs of blind and partially sighted people should be considered at all stages of journey planning, timetabling and travel.’ [[6]](#footnote-6)

### Keeping town centres alive

#### 3. How can equality and diversity issues be addressed in policies that create and sustain resilient town centres?

Walking journeys are of fundamental importance in ensuring blind and partially sighted people can live their lives with as much independence as possible. However, recent – and sudden – changes to the layouts of our towns and cities and the way we travel have impacted on the safety of people with sight loss to get around independently and their confidence to do so.

Public Health Scotland recently published a report ‘Road Space Reallocation in Scotland: A Health Impact Assessment’.[[7]](#footnote-7) The report acknowledges that ‘many disabled people have been disadvantaged by recent road space reallocation schemes, with most reporting that the measures made it more difficult for them to get around. The biggest reason for this was that the design of the reallocated space did not create an accessible space for pedestrians, including wheelers, with mobility or sensory impairment. Designs that shared pedestrian and cycling space were particularly difficult for disabled people to navigate. This was exacerbated by the rapid speed of the change, which caused difficulties for disabled people who need to plan journeys very carefully to find accessible routes.’ [[8]](#footnote-8)

Its recommendations on ‘Improving accessibility for varied needs’ include:

* ‘When reallocating road space to pedestrian, wheeling and cycling use, or public space, it is important to design the space well to ensure accessibility for people of different needs. There should be consultation with relevant stakeholders who can advise on accessibility needs, such as the Mobility and Access Committee for Scotland, Disability Access Panels and other local groups. There should also be consultation with public transport providers to identify and address any impacts on the public transport network.
* ‘Road space reallocation should avoid creating spaces that are shared between cyclists and pedestrians. Cycleways should be separated from both motor traffic and pedestrians. Any bus stop design that requires people to cross the cycleway should be designed to ensure bus users have priority. Cycling infrastructure should follow best practice design guidance to ensure safety and accessibility for pedestrians as well as cyclists.
* ‘There should be some disabled parking bays retained that provide easy access for disabled people and carers, including accessible bike parking.’ [[9]](#footnote-9)

RNIB Scotland believes that bus stop designs that require pedestrians to cross a cycleway should not be deployed as they cause confusion for all users. They present particular dangers for blind and partially sighted people.

However, we welcome the recommendations that road reallocation should avoid creating shared spaces between cyclists and pedestrians and that cycleways should be separated from both motor traffic and pedestrians as well as the retention of disabled bays.

Inclusive and accessible street design is better for everyone, ensuring the whole community can access and enjoy their area, key services and amenities including retail outlets whilst public transport has a key role to play in reviving town centres.

Such steps would facilitate increased footfall on the high streets.

### E-Commerce activity in Scotland

#### 1. What are the implications for businesses of increased online shopping and digital activity in the customer journey?

During the pandemic several high street businesses either developed for the first time or extended their use of online platforms. Businesses will benefit from having websites that are easy to use, accessible, and secure.

It must be acknowledged that levels of digital uptake can be significantly lower for people with disabilities.[[10]](#footnote-10) The availability and cost of assistive technology such as screen readers, as well as geographical barriers to reliable broadband and availability of public service internet access add to the risks of digital exclusion.

Accessing online information, for example, filling in forms online, can be very time consuming or completely inaccessible.[[11]](#footnote-11) Visual barriers such as inconsistent font sizes prevent blind and partially sighted people from accessing information with ease. One respondent to a digital participation survey conducted by the Royal Society of Edinburgh explained:

“Websites are very complex to navigate in general so when you have sight loss of any degree it becomes harder. It would be good to have a button to press so that the website becomes less busy and shows simple text.”

Listening to people’s experiences of accessible websites is a simple and inclusive way of identifying changes needed to ensure online information is accessible to all. Checking for potential accessibility issues during web-building ensures that accessibility issues have been considered as one respondent agreed:

“[We need] Better user testing of websites.”

The Equality Act 2010 specifies the need for website accessibility, and the right for disabled people to have access to everyday goods and services.

### For further information please contact:

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2. Scotsman, 8 April 2022 - [https://www.scotsman.com/business/scotland-sees-steepest-decline-in-store-footfall-out-of-all-uk-nations-3645760](https://protect-eu.mimecast.com/s/2_tGCOPE2sABXoVTEdYpa?domain=scotsman.com) [↑](#footnote-ref-2)
3. [Online shopping for Scots: bah humbug or yuletide joy? – SPICe Spotlight | Solas air SPICe (spice-spotlight.scot)](https://spice-spotlight.scot/2020/11/23/online-shopping-for-scots-bah-humbug-or-yuletide-joy/) [↑](#footnote-ref-3)
4. RNIB, ‘Who put that there!’, (2015). Campaign report. Available at: <https://www.rnib.org.uk/campaigning-policy-and-reports-hub/transport-and-getting-around> [↑](#footnote-ref-4)
5. See [Coronavirus (COVID-19): guidance for those providing guide support](https://www.webarchive.org.uk/wayback/archive/20200711110224/http%3A/www.gov.scot/publications/coronavirus-covid-19-guidance-for-those-providing-guide-support/) [↑](#footnote-ref-5)
6. RNIB Scotland, ‘Local Vision: Manifesto for Scottish local authority elections’, (2022) - <https://www.rnib.org.uk/sites/default/files/Local%20Vision%2C%20RNIB%20Scotland%20Manifesto%20A4%202022%20v03.pdf> [↑](#footnote-ref-6)
7. Public Health Scotland, ‘Road Space Reallocation in Scotland: A Health Impact Assessment’ (2022) - <https://www.publichealthscotland.scot/media/12261/road-space-reallocation-in-scotland-a-health-impact-assessment.pdf> [↑](#footnote-ref-7)
8. Ibid. [↑](#footnote-ref-8)
9. Ibid. [↑](#footnote-ref-9)
10. The Royal Society of Edinburgh, ‘Spreading the benefits of digital participation’, (2014). See <http://www.rse.org.uk/wp-content/uploads/2016/09/Digital-Report-High-Res-EQ5.pdf> [↑](#footnote-ref-10)
11. Ibid. [↑](#footnote-ref-11)