RNIB Scotland is the leading charity working with blind and partially sighted people in Scotland. We deliver services our members need and campaign for their civil and welfare rights.

The Bill introduced by Mark Ruskell MSP seeks to reduce the speed limit in restricted roads from 30mph to 20mph across Scotland. Restricted roads are normally street-lit urban or residential streets, although there some exemptions to this definition. The Bill would set a default speed limit of 20mph in restricted roads.

We note that the Bill is designed to serve a number of policy aims, in particular, the enhancement of road safety, but also changing driving culture and promoting compliance as well as improved health outcomes and more active travel and reducing pollution.

We would welcome the achievement of these policy objectives but wish to comment briefly on the impact that the Bill might have in relation to human rights or equalities for any particular group of people, in this case, blind and partially sighted people.

The Bill's Policy Memorandum cites Transport Scotland’s Good practice guide on 20 mph speed restrictions (2016) which revisits the recommendations made in its initial 2009 report Go Safe on Scotland’s Roads: it's Everyone’s Responsibility as part of a mid-point review, presses for appropriate speeds and sees a strong argument for 20 mph restrictions. The 2016 report renews its commitment to roads which focus on the needs of all road users and recognises that road users such as pedestrians and cyclists are more vulnerable to accidents. It states that 20 mph is the ideal speed limit for residential and built-up areas in Scotland.

The Good Practice Guide further sets out that the Scottish Government’s policy is 'to encourage the creation of shared spaces [bold added] and social streets to encourage active travel and create places that people can enjoy and that for residential streets, a maximum design speed of 20 mph should normally be an objective'.

We can see benefits in speed reduction but strongly believe that the introduction of 20mph zones should not inevitably be linked with shared space schemes.

The disadvantages of shared space were highlighted in Accidents by Design: The Holmes Report on “shared space” in the United Kingdom by Lord Holmes of Richmond MBE (2015). This warned that 'overzealous councils are risking public safety with fashionable "simplified" street design'. It found that 'people's experiences of shared space schemes are overwhelmingly negative', that 'over a third of people actively avoid
shared space schemes' and that drivers consistently report being unsure of who has right of way, resulting in 'confusion, chaos and constant near misses'.

People with sight loss rely on controlled crossings and clear delineation between the road and the footway to feel safe and confident navigating alone. By removing these vital elements, shared spaces and shared surfaces make all road users, but especially those with sight loss, feel anxious and vulnerable when attempting to use the space. Guide Dogs research in 2017 on shared surfaces, Scared surfaces, revealed that significant levels of anxiety and discomfort were created by visiting a shared surface area among a large proportion of road users, but especially among people with disabilities. One in three respondents with a disability said that they would go out of their way to avoid visiting a shared surface street.

In October 2018, Michael Matheson MSP, Cabinet Secretary for Transport, Infrastructure and Connectivity, and Kevin Stewart MSP, Minister for Local Government, Housing and Planning, wrote to all Scottish local authorities, advising that, following the recent launch of the Accessible Travel Strategy by the UK Government, a letter was issued to local authorities in England requesting a pause on all shared space schemes until further research is undertaken. UK Government Local Transport Note 1/11 Shared Space was also withdrawn.

The Scottish ministerial letter highlights the importance of taking account of stakeholder views when considering or designing shared space schemes and the guidance places emphasis on the need to adopt an inclusive design approach. Scottish Ministers say that they are committed to developing new guidance on inclusive design for all.

It reminded local authorities about their duties under the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 (as amended), and those, in turn (at Regulation 5) set out an obligation on public authorities to assess the impact of any policy or practice on people who share one or more protected characteristics, and that the assessment should include taking evidence from those affected.

We hope for a positive outcome from review of guidance. Nonetheless, as a sight loss charity we find ourselves increasingly representing the concerns of blind and partially sighted people confronted with the proliferation of public realm schemes that strip away kerbs and controlled crossings, often adding the challenge of crossing a cycle path to access bus stops. Sometimes the schemes are presented along with a 20mph zone. Examples of these schemes exist across Scotland and threaten to make many town and city centres no-go zones for blind and partially sighted people. This is a long way from 'active travel' and we hope that the Committee will note our concerns about the linkage increasingly made between introducing 20mph zones along with shared space/shared surfaces. We would be happy to provide further information.