

PE1595/A

Dear Sir/Madam,

The petitioner for PE1595 on “Moratorium on shared spaces” written submission and objection.

I am writing to express serious concerns over a recent proposal of a shared space developments in Scotland. I understand that development plans include shared surface streets and am concerned that this street design would make it difficult for those who are blind or partially sighted to use the area independently.

I would like to outline a number of concerns blind and partially sighted people have with the introduction of a shared space scheme.

- Shared surfaces rely on eye contact between pedestrians and drivers - so this completely fails to take into account the needs of blind and partially sighted people.
- Navigating the street without designated crossing points will mean depending on drivers to notice and stop when a blind or partially sighted person wants to cross. I am seriously worried about safety issues and want to see safe crossings included in street design.
- Kerbs are a very important part of street layout for blind and partially sighted people, yet shared surface schemes mean kerbs are removed. The kerb is vital for street orientation for long cane users, whilst guide dogs are trained to navigate by them. Removal of the kerb risks putting people in danger as it is difficult to work out where the safe area stops and the roadway for vehicles begins.
- In order to create a shared space scheme, a road can be wiped clear of all markings, signs and street furniture, sometimes including tactile paving. Tactile paving is vital to street navigation and informs people about risks and safe places to cross the road. Without it, yet another aid to mobility and safety for blind and partially sighted people is lost.
- A fear factor will cause another barrier to blind and partially sighted people. Without a defined safe space away from traffic, blind and partially sighted people will lose confidence. Blind and partially sighted people will stop using these streets and local businesses will miss out on the economic benefits.

Guide Dogs for the blind UK research has demonstrated that shared surfaces, often used to implement shared space proposals, affect the safety, confidence and independence of people who are blind or partially sighted. Without a clearly delineated “safe” area, many visually impaired and other disabled people feel vulnerable when sharing space with drivers and cyclists. Thus, if the proposed redevelopment of this area does include the use of shared surfaces where there is no, or reduced, physical separation between areas used by pedestrians and

vehicles, there may be significant implications for pedestrians who are blind or partially sighted.

Other groups of disabled people share these concerns and over 40 organisations including disability organisations representing people with physical, sensory and learning disabilities support Guide Dogs" campaign on shared surface streets.

Lord Holmes of Richmond published the Holmes Report into Shared Space and has called for a "moratorium on any new „frightening and intimidating" shared space schemes".

I believe that the redevelopment of any area with a shared surface, without effective separation between areas used by pedestrians and vehicles, has significant implications for blind and partially sighted people, and other vulnerable pedestrians may also be at risk.

The Department for Transport published a Local Transport Note on Shared Space (LTN 1/11) which emphasises the importance of stakeholder engagement and inclusive design. This LTN explicitly acknowledges that poorly designed shared space schemes can be problematic particularly for blind and partially sighted people.

By introducing shared surfaces without due regard for the concerns of those who are blind or partially sighted, the local authority may be in breach of your duties under the Equality Act 2010 (DDA for Northern Ireland) which requires local authorities to play their part in making society fairer by tackling discrimination and providing equal opportunity for all.

Local authorities must carry out an Equality Impact Assessment paying due regard to the implications for disabled people, and in particular for people who are blind or partially sighted as it is known that there are likely to be implications for them. I would be grateful if you would send me a copy of that Equality Impact Assessment.

I urge you to look again at this scheme and to consider what can be done to enable pedestrians who are blind or partially sighted, and other disabled and vulnerable pedestrians, to be able to use this area. I also request that you consider your policies to ensure that future street developments intended to improve the environment are accessible and inclusive for all.

I look forward to hearing from you.

Yours sincerely,

Mark Tilsley