

Response to the Petitions Committee

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The Guide Dogs for the Blind Association, Shared Space

Guide Dogs Cymru is grateful for the opportunity to respond to evidence given by the Minister for Local Government and Communities with regard to shared space schemes and their impact on blind and partially sighted people and other vulnerable pedestrians.

We are experts in the area of mobility for blind and partially sighted people. Our work has been transforming the lives of many thousands of blind and partially sighted people for over 80 years.

Our core service is the provision of guide dogs, but we also work with those who want to learn how to get about using a long cane, teaching them specific techniques including orientation and how to form a mental map of a route, negotiating obstacles such as street clutter and cars parked on pavements.

An essential element of this skills acquisition is finding a safe and reliable route using navigational clues such as kerbs, tactile surfaces, controlled road crossings, colour contrasted street furniture, almost anything in fact, which tells the individual about their surroundings and can be used as a guide, or reassurance, that they know exactly where they are within their environment. Even if a guide dog is being used for mobility, the owner must know where they are going, which direction to take at junctions and crucially, when it is safe to cross a road.

Guide dogs are trained to stop at a kerb and sit, indicating to the owner that there is a choice to be made about whether they go straight on or not. Without a kerb, there is no clear warning for a dog or a long cane user and in this way, kerbs are the foundation of orientation. Even where they are dropped, they must be marked with tactile surface to show where the pavement ends and the road begins. Without this strong clear message, both guide dog owners and long cane users can, without knowing it, step into the road.

A shared surface street is where the footway and carriageway are at the same level with no distinct pavement and in some cases the removal of controlled crossings. Some schemes also have raised junctions where the carriageway is at the same level as the footway. In these schemes, cars, buses, cyclists and pedestrians have to share the same surface. The idea is to encourage drivers to be more cautious.

Blind, deaf blind and partially sighted people find it very difficult to use shared surface streets and many avoid these areas. For people with learning difficulties they require potentially difficult choices to be made and young children, without the actual presence of the kerb, may step out into the traffic.

Kerbs are particularly for Deafblind people, who not only face the issues encountered by people with visual impairments, but also have extra difficulties hearing traffic. Therefore, judging the direction and distance of moving vehicles becomes even more difficult.

The advocates of shared surfaces suggest that pedestrians, motorists and cyclists should make 'eye contact' to decide who moves first. This compromises the safety and independence of many vulnerable people. Even if traffic is slow moving, drivers and cyclists are considerate, there can be a constant pressure of being prepared to avoid vehicles without a pavement area to rest. This is of course particularly an issue if you cannot see the traffic.

As a blind participant at a focus group in The Netherlands said:

"Nine out of ten car drivers will stop for me. How do I recognise the tenth?"

In some shared space streets the footway and carriageway are visually different but there is no difference in the level of areas of the surface intended for pedestrian or vehicle use that would be found with traditional pavements and roads. Not only is there no distinction for pedestrians who cannot see, it is also very easy for cyclists and cars to drive and park on the footway area.

The Welsh Government has adopted the Social Model of Disability, which signals their acknowledgement that disability is the result of the environment and not the fault of the individual. We would contend that shared surface streets are a real challenge to the Social Model by creating an environment which prevents disabled people taking control and excludes them for reasons which are not their fault. Forcing them to depend on eye contact for safe passage through a shared surface area means that those for whom this is impossible or unreasonably difficult, cannot move about safely and are therefore excluded for reasons related to their impairment. We would ask that the committee take this into account when considering the evidence we present in this paper.

Summary and Context

We are particularly pleased to note the Minister's reluctance to implement the UK Government's guidance on shared space, until he receives further evidence of impact. Our aim in submitting evidence to the Committee is to illustrate the problems of shared surface schemes where they have been experienced in England, Wales, Northern Ireland, Scotland and Europe.

The Minister's view and that of his Government, is that there needs to be

"better respect of users of infra structure, both of road services and pedestrianised areas."

In this response, we will give examples of shared space schemes where that "respect" element has been absent, resulting in accidents, including one very recent one which was sadly fatal.

The Minister goes on to say that

"The issue is about the respect element, because at the moment we have fixed solutions: kerbsides, barriers etc., which separate pedestrians from traffic. Once you remove those, you would think that the risk would increase. We need to be able to evidence that. If we are to propose that we should have a shared space, we have to be assured of the cultural operation of such an area, so that pedestrians and road users have equal rights. We have to be convinced of that and I am yet to be convinced. That is why we need to look at the evidence that is being pursued and what is happening in England. There are examples of other countries that do this as well, so we are looking beyond the UK boundary."

To answer the Minister, we will provide evidence from shared space schemes in Northern Ireland and refer to the concerns of blind and partially sighted pedestrians in Europe.

Shared space schemes in England

Policy context

With reference to the Local Transport Note guidance issued by the Department for Transport: Guide Dogs made a number of comments about the content of the document, summarised below:

We were pleased to note

- The inclusion of delineated footway areas, comfort space
- Where tactile or textured surface is to be used as a delineator, the minimum width of tactile paving should be 800mm
- Inclusion of the Equality Act 2010 in the document
- The removal of a stipulated 25mm kerb height

(Guide Dogs has conducted research to show that blind and partially sighted people cannot reliably detect this height of kerb).
(Appendix 1)

- The introduction states that there is 'no such thing as a definitive shared space design. Each site is different and the way the street performs will depend on its individual characteristics.
- Tonal contrast is also mentioned with the suggestion, (rather than the stipulation), that abstract patterns should be avoided as they may confuse any delineation messages.
- The recommendation of post scheme monitoring and the allocation of funding to cover modifications should they be necessary.

We were concerned to note

- Equality Impact Assessment (EIA) is mentioned, but without mentioning its importance. It has been listed as one of the quality audits that could be, not should be, carried out
- Some parts promote a minimalist approach, which introduces features if deemed necessary. For example the provision of a comfort space is mentioned as one aspect that could be omitted in the initial design and created later if required.
- There is reference to Exhibition Road (Kensington, London) where the initial trials found that a 800mm corduroy tactile surface could be reliably detected by blind and partially sighted pedestrians. In contradiction, it goes on to say that 'an examination of the results suggests there may be scope for reducing this width to 600mm while maintaining its effectiveness as a delineator strip!' This has not been monitored for effectiveness and is not what we would recommend.
- The document does not promote controlled or uncontrolled crossing (6.20 – 6.22) as they require markings and associated street furniture which do not comply with the shared space ethos, rather informal crossings are encouraged.

N.B. Please note the Caernarfon example in the Wales shared space section in this paper for an example of where a controlled crossing was required for the safety of blind and partially sighted pedestrians.

We would refer the Committee to the appendices to this report, which provides further detailed analysis of shared space research.

Shared space schemes and experience in England

Possibly the most well known example of a shared space scheme is Exhibition Road in London.

Good progress has been made on the back of The Guide Dogs for the Blind Association's Judicial Review proceedings taken against the Royal Borough of Kensington & Chelsea. The original design of a single surface environment with no delineation was redesigned and split in to pedestrian footways and a road section with a transition zone on one side for parking cars, bike racks etc. Guide Dogs has been working with the Council, who have now applied a corduroy paving strip 800mm in width as a delineator, which is detectable even at acute angles. The traffic speed has been reduced to 20mph, street furniture has been aligned and educational materials are being prepared.

One of the remaining issues in Exhibition Road is the absence of a light controlled crossing and Guide Dogs and the partner organisations of the Streets Ahead Campaign have highlighted the benefits through high profile media interviews and in meetings with the council. The Royal Borough of Kensington & Chelsea is now considering the evidence to support a controlled crossing in Exhibition Road, but the scheme continues to be controversial:

In February 2012, a 25 year old man suffered head injuries after being hit by a delivery vehicle, just two weeks after the official opening of the scheme by the Mayor of London, Boris Johnson.

The local press reported,

"Exhibition Road, in South Kensington, was only reopened as a so-called shared space at the beginning of the month, despite the objections of residents groups who said it would be dangerous."

Pauline Auerbach who owns the nearby Kensington Creperie said,

"As far as I'm concerned, it was only a matter of time before something like this happened. We've seen plenty of near

misses since the road was reopened. My manager saw it and although the guy that got hit didn't seem to be too badly injured, surely it is a warning to the council. I know these people have to do their job, but delivery drivers have been known to turn or reverse where they shouldn't do. They don't care because they don't have to live here."

Emergency services were called to treat the man and he was taken to St Mary's Hospital in Paddington with head injuries.

Labour Group deputy leader, Councillor Emma Dent Coad, said:

"It is pure luck that the victim was not more badly hurt and we hope he makes a speedy recovery. But this accident was entirely preventable. The so-called shared space design for Exhibition Road is simply unsuitable for such a high volume of pedestrians and traffic. We've been saying this since the proposal was first discussed but the Council will not listen. They will have to make drastic changes to the scheme now, or suffer the consequences."

It is worth noting that the accident victim was not visually impaired.

It is our view that visually impaired people are even more vulnerable than their sighted peers in such environments

Regarding the shared surface scheme in Ashford, Kent, the BBC reported,

"Pedestrians have been avoiding crossing the 'shared space' area of Ashford, according to a study by the University of West England. (Appendix 2)

The scheme, which turned Ashford's ring road into streets where drivers and pedestrians have equal priority, has been in place since November 2008.

Signs and traffic lights were removed from the area and the scheme had been hailed as a success.

However the study showed most people wanted a return to formal crossings.

It found that people avoided the centre of Elwick Square, keeping to the edges rather than trying to cross the road.

Dr Steve Melia, from the West of England University said:

"The whole idea of shared space is supposed to be good for pedestrians, benefiting them, encouraging people to walk. When they do cross, they try to use the courtesy crossings which are marked into the ground. But people don't like those very much and they don't feel that drivers give the same amount of priority as they would on a traditional zebra crossing."



In Blackpool, on 21 July 2011, the local press reported a car accident on the "new look" Promenade, where a shared space scheme has been introduced. Police were called to the incident outside Chubby's Bar, near Talbot Square, at around 8.30pm the day before. No one was injured in the collision but police say they will be 'keeping an eye' on that stretch. A spokesman said:

"It is the first accident on that section of road. We believe the vehicles were heading north away from the Golden Mile

towards Talbot Square when the incident happened. We will keep an eye on that area. It has been changed to a 20mph zone which people need to be alert to."

There had been safety concerns ever since the Golden Mile designed around the 'shared space' concept with no road markings, or kerbs, re-opened to traffic the previous month. Some have anticipated more accidents with one local group describing the scheme as having become a "no-go area" for blind residents and visitors.

A more serious accident resulting in injury to a pedestrian had occurred earlier that month, 6 July 2011. Kevin Bradley, aged 73 was walking on what he thought to be the pavement along the new look promenade towards Blackpool Tower, when he was struck by a taxi. He was hospitalised with a broken leg and cuts to his head.

His daughter, Mrs Hinchcliffe from South Shore, told the local paper

"The council should either pedestrianise the Promenade or put in proper pavements. I have no doubt it is only a matter of time until someone is killed, the new layout is so confusing. My dad was looking at the ground because he thought he was on the pavement and this was in broad daylight. What will happen in the Illuminations when it's really busy and people are looking at the lights? I've driven down there and it's hard to work out where the road ends and the pavements start, people's lives are at risk."

According to the local paper, Blackpool Council have defended the new-look Promenade saying safety precautions have been put in place.

John Donnellon, Service Director for Built Environment said:

"We will fully investigate the factors which led to Mr Bradley stepping out in front of the taxi and see how it could have

been avoided. Following feedback we have already placed signs around this junction to let pedestrians know that it's used by buses and taxis and we will consider if other alterations are needed. The new layout of the Promenade is designed to slow the speed of vehicles through the area and the measures we put in place will have helped avoid a more serious accident".

Putting aside the nature in which councils spend more council tax payers money trying to put right fashionable schemes that are not fit for purpose, the claim that the reduction in traffic speed meant that Mr Bradley's injuries could have been worse ignores the possibility that with a traditional kerb, Mr Bradley may have completed his journey without incident or injury.

Finally for England, the most tragic consequence of a shared space scheme occurred in Coventry in January 2012.

The following story is taken from a report in the Coventry Telegraph

The niece of a Coventry pensioner who died after being hit by a bus in a "shared space" has called for traffic lights to be re-introduced. David Thompson, who was partially sighted, suffered multiple injuries in the accident in January and later died in hospital.

The collision occurred in part of the city centre where both vehicles and pedestrians have an equal right of way. Margaret Thompson said that if nothing was done "another accident" would happen. She said her uncle suffered a shattered pelvis, two broken legs, a broken arm and lacerations to his lower leg in the accident that happened in Hales Street. He later had to have a leg amputated. Ms Thompson said that she wanted

"The council to put the lights back up and keep pedestrians safe. With the traffic lights there he didn't struggle at all. I think once the traffic lights had gone he would have struggled. Anybody would struggle."

Coventry City Council, which has said it will not comment about the incident until after a police inquiry, began to introduce the new-style junctions at a number of places in the city last year.

We would ask the committee to note that the common theme running through these accidents is confusion and the need for safety measures such as additional signage and educational materials to be introduced. We would contend that in a time of financial restraint, shared space schemes are a poor use of public money and we will go on to show how in Wales the same issues have arisen. It is significant that the one fatal accident involved a partially sighted pedestrian, but not surprising.

Shared Space Schemes in Northern Ireland

There are two schemes to note here: the Belfast Streets Ahead project (the regeneration of Belfast City Centre) agreed to retain the kerb in its main street, Donegal Place, until full pedestrianisation. This was a departure from the original plan to introduce a shared street until pedestrianisation took place.

The second was when a representative from the Department for Social Development (DSD) at a meeting of the Northern Ireland Vision Strategy stated that there was a moratorium on shared streets' awaiting the outcome of the DfT (Department for Transport) research.

Shared surface schemes in Scotland

The Scottish Government recognised the potential negative impact of shared surfaces on disabled people in its policy document 'Designing Streets'. This states the need for consultation with disabled people at an early stage and there are many examples of where this is happening, on a local scale, across Scotland.

Designing Streets, published in March 2010 is the first policy statement in Scotland for street design and marks a change in the emphasis of guidance towards place-making and away from a system focused upon the dominance of motor vehicles. It has been created to support the Scottish Government's place-making agenda and is intended to sit alongside the 2001 planning policy document Designing Places, which sets out government aspirations for design and the role of the planning system. (Designing Streets is available at <http://www.scotland.gov.uk/Publications/2010/03/22120652/0>)

Shared surface schemes in Europe

In February 2012, the Austrian Federation of the Blind and Partially Sighted (BSVÖ) in cooperation with the EBU (European Blind Union) and a Belgian partner applied for funds at the EU Commission's citizenship programme to realise a project on how shared spaces in Europe can be made to work for blind and partially sighted people.

The idea is that as a first step, the exchange of experiences and knowledge between concerned citizens across the EU is fostered by workshops and mutual visits which assess already existing or planned shared spaces in the respective countries. In a second phase, best practices are identified and lastly, recommendations and guidelines based on the experience gained are developed with the objective to reach Europe-wide standards for shared spaces.

Generally, of course, shared spaces are perceived as a threat to blind and partially sighted street users. There is an official final presentation of the shared space project in the North German town of Bohmte available at http://www.bohmte.de/pics/medien/1_1253627530/Abschlusspraesentation_Bohmte_090922.pdf (in German only) which states that there needs to be far more consideration of the requirements of vulnerable groups when developing shared space schemes.

Shared space schemes and experience in Wales

Policy context

Before giving examples, it is useful to take into account the policy context: There are 115,000 people with sight loss in Wales and 18 of the 22 local authorities in Wales have a higher prevalence of sight loss than England due to a much greater proportion of people aged over 65 years.

Research commissioned by Sense indicates that there are several thousand people in Wales who experience combined sight and hearing difficulties and who can be classified as deaf-blind. The prevalence of deaf-blindness is particularly noticeable among those over 65 years old and is highest among those over 70 years old.

The provisions of the Equality Act require all local authorities to engage with disabled people, conduct Equality Impact Assessments (EIA) and ensure that the views of those with whom they engage are clearly reflected in the published EIA. Sadly it is our experience that EIA's are not consistently understood or conducted and the consequences of that failure can be seen in the examples below.

However, the Welsh Government has undertaken to publish a Framework for Action for Independent Living. The objective supports the "Programme for Government" commitments on supporting people by promoting positive attitudes, removing barriers and strengthening advice/support and advocacy. There are opportunities to improve significantly the wellbeing of disabled people and increase their participation in employment and community life.

Within this framework, the Independent Living Project is supporting several working groups and one of these is on access to the built environment. At the point of writing this paper, the group has only met once, but already it has flagged concerns including the lack of effective "Design and Access" statements, the loss of effective Access Groups and the absence of Access Officers. More meetings are scheduled and it is to be hoped that the real experience of the disabled people who are invited will inform the programme for action to be published later in 2012.

Examples



The most concerning example of a shared space in Wales is the Maes in Caernarfon. Here the regeneration of the town square has resulted in an area where pedestrians and vehicles have to negotiate safe passage across an open space where a number of roads converge. Since the piece below was published in the local press, some adaptations have been made such as the addition of some guardrails and a controlled "Puffin" crossing in place of the Zebra crossing referred to here. There is also a recognition within Gwynedd council to learn from the scheme and much more effective discussions now take place with the Access Group.

Local Press statement:

Blind have safety concerns over Caernarfon crossing

13 August 2009

CAMPAIGNERS for the visually impaired and the disabled are calling for a "dangerous" zebra crossing to be removed from the entrance to a town square before someone is killed.

Caernarfon Blind Club members and the Arfon Access Group want a puffin crossing to be installed on Bridge Street to allow blind people to cross and enter Y Maes safely.

According to them, the current crossing offers no security or peace of mind to those blind people brave enough to enter the square as it's currently laid out.

The Arfon Access Group also accused Gwynedd Council of "completely ignoring" the concerns they raised about introducing a "shared space" scheme and cobblestones on the Maes.

The group's secretary Vin West said:

"A zebra crossing is dangerous for a blind or visually impaired person to use as there are no lights or sounds to say that it is safe to cross. A puffin crossing on the other hand indicates when it is safe to cross, the smooth flow of traffic. The council's argument is that traffic lights actually cause drivers to speed up but that frankly is a separate issue to installing a safe crossing (for blind people). The council has told us that it will continue to use the zebra crossing on a trial basis indefinitely. But that is not acceptable. Do we have to wait for an injury or worse to occur before this crossing is removed? At the minute there are members of the blind and visually impaired community actively avoiding going anywhere near the Maes because they feel it is too dangerous".

Caernarfon Blind Club members John Ellis, Ann Hughes and Morlais Williams are all calling for a puffin crossing to be installed.

John Ellis from Rhos Isaf, is blind. He said:

"With a puffin crossing you press the button and know it's safe to cross. There is so much noise and traffic down there at the moment that it's a complete minefield and there is so much uncertainty with a zebra crossing. It's only a matter of time before someone is killed or seriously injured."

He also issued a challenge to council officers:

"We've invited the officers of the council to walk blindfolded around the Maes, to simulate blindness and to show the obstacles blind people have to face there every day but they have refused to take up our offer."

Arfon Access Group also accused the council of ignoring their concerns. A council spokesman said it was "always eager" to hear the views of local access groups and would continue to hold constructive meetings with members of the Arfon Access Group, Guide Dogs for the Blind and the Caernarfon Blind Club.

The Aberdare Regeneration Scheme

In June 2011, Rhonda Cynnon Taf (RCT) council began a public consultation which sought the views of local people on proposals that would significantly impact on the town centre, including areas where elements of shared space were to be introduced. This paper will not go into detail about the process that followed, but what is important is that following discussion with local blind and partially sighted people, supported by Guide Dogs Cymru and RNIB Cymru, the need to retain the kerb was recognised by the council, along with other changes summarised below:

Summary of key achievements

- The traffic orders are to be strengthened in pedestrian zone areas, to prohibit motor vehicle access during the busy shopping hours. This will provide a safer environment for all users.
- A 20mph zone is to be introduced around the town centre gyratory to reduce traffic speeds.

- Provision of granite paving at key road crossing points will raise driver awareness to the likelihood of pedestrians.
- In many areas, a change in colour between the new sandstone footways and the black tarmac carriageway will provide good colour contrast.
- Kerb upstands are to be maintained to define the edge of the road providing assistance to guide dog and long-cane users.
- A new ramped access has been provided to allow easy access to the front of the Library.
- Appropriate use of corduroy and tactile paving.
- The project seeks to 'de-clutter' the street furniture and to rationalise its location to minimise obstructions to footpath users.
- The adoption of street furniture with good colour contrast. An example being the retention of the existing black bollards rather than the use of smaller granite bollards.
- Enhanced communications including issuing of media releases to the local Talking News service and importantly advance notice of forthcoming work areas.
- Enhanced communications including establishing close working relationships with user groups including RCT Access Group, the County Steering Group, RNIB and The Guide Dogs for the Blind Association.

The last point here is perhaps of greatest significance as it refers to a positive outcome and the prospect of a future productive dialogue between local disabled people and RCT council.

Abertillery Regeneration

This is a smaller scale regeneration but nevertheless significant for local blind and partially sighted people.

A guide dog owner, Mr N, who was being adversely affected by changes to his familiar environment, contacted Blaenau Gwent council. The contentious issues were fewer and simpler to resolve than in Aberdare, but we would site the council's response as a model of good practise. One particularly dangerous crossing, where there were no kerbs and where it was easy for Mr. N to step into the road, (which is busy and on a main route), will be changed from a Belisha Beacon to a Puffin or Pelican which Mr N can use in safety. In other locations, the raised crossings which again put Mr N at risk of stepping inadvertently into the road will be clearly marked with the appropriate tactile warning surface. These are not true examples of shared spaces, but several emails and one meeting resulted in a positive solution for all concerned.

In Wales, we are pleased to say that there are examples of local authorities demonstrating a willingness to take on board the concerns of disabled, blind and partially sighted people over shared spaces. This is not consistent and so cannot be taken to mean that there is a good level of understanding among highways engineers, design consultants and even those responsible for equality issues. We would therefore welcome clear guidance from the Welsh Government to ensure that EIA's are conducted, that engagement with a range of disabled people is accessible, proportionate and appropriate and that scant financial resources are not squandered on schemes that can result in "no go" areas for vulnerable pedestrians.

Conclusion

This summary of the impact of shared surfaces is presented to the Petitions Committee by Guide Dogs Cymru, supported by our partners across Wales. The appendices contain more technical and academic research, but the essence of what we are asking is simple:

That the Welsh Government takes steps to prevent the introduction of further shared surface schemes in the light of the evidence we have included in this paper.

We know that many blind and partially sighted people are isolated and that the incidence of depression caused by sight loss is high. Learning to get about safely in the external environment is hard enough and when shopping, going to the doctor, or just visiting friends involves negotiating through traffic without the reassurance of a kerb, it is not surprising that many vulnerable pedestrians, as we have seen, are too afraid to take the risk.

The level of understanding displayed by many local authorities is low and as in the Exhibition Road example, local people and the organisations that support them often have to fight hard to get their voices heard. We hope that the specific engagement duties in Wales will give that voice strength, but there is much work to be done and in the meantime there is very little to prevent local authorities introducing shared surfaces, even when they can affect the mobility of vulnerable pedestrians in such a profound way.

Appendices

1. TNS-BMRB (2010) The impact of shared surface streets and shared use pedestrian/cycle paths on the mobility and independence of blind and partially sighted people. (Commissioned by Guide Dogs)
2. Moody ,S. and Melia, S. (2011) Shared space - implications of recent research for transport policy. Working Paper. University of the West of England, Bristol. The publisher's URL is <http://www.journals.elsevier.com/transport?policy/>
3. Guide Dogs (2010) Inclusive Streets: Design principles for blind and partially sighted people. ([http://www.guidedogs.org.uk/fileadmin/gdmain/user/Help_us/Campaigns_and_petitions/Documents/Inclusive Streets Design Principles booklet Guide Dogs 2010.pdf](http://www.guidedogs.org.uk/fileadmin/gdmain/user/Help_us/Campaigns_and_petitions/Documents/Inclusive_Streets_Design_Principles_booklet_Guide_Dogs_2010.pdf))

All the above are attached as separate documents