



Revised Statement on Shared Space

(April 2018)

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Making our information accessible

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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

The aim of the Committee is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (hereafter referred to as the Department).

Background

Imtac published a statement¹ on shared surface/space² schemes in 2009. In this statement the Committee highlighted the widespread concerns about the emergence of the shared space concept expressed by disabled people, older people and organisations representing them. The statement called for a moratorium on this type of scheme - until such time as it could be demonstrated that they are safe and inclusive. Since the publication of this 2009 statement there have been significant developments in relation to shared space. Given these developments Imtac has decided to refresh and update its statement on the subject.

Statement on shared surfaces

Imtac believes that all public investment in Northern Ireland must take account of accessibility for disabled people and older people. In relation to transport, accessibility for disabled people and older people should be part of the mainstream design of policy, projects and services. Both Section 75 of the Northern Ireland Act (1999) and The Disability Discrimination (NI) Order 2006 places specific equality duties on every public body in Northern Ireland. This legislation requires Government Departments and local Councils here to use their influence over the built and pedestrian environment to promote equality of opportunity for disabled people, older people and others. Equality and inclusion must be

¹ <https://www.imtac.org.uk/publications/imtac-statement-shared-surface-streets>

² In the 2009 statement Imtac used the term shared surface street. This was because shared space has a particular meaning in Northern Ireland. In revising the statement the Committee has decided to revert to the term shared space.

addressed within government policies and decision making. The involvement of older people and disabled people in the decision making process is a key requirement of the duty.

With the above in mind, Imtac has significant concerns about the development of proposals which incorporate shared space design in streets in Northern Ireland where the kerbed demarcation between pedestrians and vehicles is removed or substantially reduced. These concerns persist despite the publication in 2011 of LTN 1/11 Shared Space guidance³ from the Department for Transport (DfT) on the development shared space schemes and the publication in 2015 of the Director of Engineering Memorandum “Kerb Heights in Public Realm Schemes⁴” by the Department for Infrastructure in Northern Ireland.

Imtac’s concerns are reflected by wider research undertaken elsewhere into the experiences of older people and disabled people using shared space. Earlier research undertaken by Guide Dogs⁵ has been supplemented by:

- A survey⁶ undertaken Lord Holmes into disabled peoples experiences of using shared space,
- A House of Lords Select Committee inquiry⁷ into the impact of the Equality Act 2010 on disabled people and
- An inquiry⁸ by the House of Commons Women and Equalities Committee into Disability and the Built Environment.

Each of these reports highlights the negative impact of shared space on disabled people, older people and others and questions the effectiveness of LTN 1/11 in delivering safe and accessible public space. Most recently CIHT published its review⁹ of shared space. Amongst the recommendations of the review was a need for further research into design and a review of existing guidance.

In Northern Ireland a public realm scheme in Lisburn incorporating aspects of shared space design has been subject to a judicial review

³ [LTN 1/11 Shared Space](#)

⁴ [DEM 154/15 Kerb Heights in Public Realm Schemes](#)

⁵ [The impact of shared surface streets and shared pedestrian/cycle paths on the mobility and independence of blind and partially sighted people](#)

⁶ [Accidents by Design: The Holmes report on "shared space" in the United Kingdom](#)

⁷ [The Equality Act 2010: the impact on disabled people](#)

⁸ [Building for equality: Disability and the built environment](#)

⁹ [Creating better streets: Inclusive and accessible places](#)

taken by a disabled person. The outcome of the judicial review¹⁰ criticised the local Council for a lack of consultation with disabled people when developing the scheme.

Imtac fully supports the principle of giving priority to pedestrians over other road users (including vehicles and cyclists) in and around our towns and cities. However, it is vital that the interests of all pedestrians are accommodated where changes are made. Therefore, in line with their obligations under equality duties, Imtac expects Government Departments and local Councils here to engage with disabled people and older people and their representative organisations at the earliest stage in the development of public realm schemes.

The Committee believes that where provision for pedestrians is shared with traffic this should be supplemented by safe and accessible pedestrian routes, separate from areas used by vehicles and cyclists. Unless and until there is an alternative delineator which through research is demonstrated to be effective, kerbed footways and formalised pedestrian crossing points with appropriate dropped kerbs and tactile paving, must be retained.

Imtac believes there are other advantages in retaining the use of kerbs:

- Kerbs assist bus operations and are essential to complement the use of low floor buses by facilitating level access at stops
- Kerbs promote road safety - the rules in the Highway Code for crossing the road begin “Stop just before you get to the kerb, where you can see if anything is coming. Do not get too close to the traffic.” This is fundamental to the Green Cross Code taught to children.
- Government advice on traffic management emphasises that the traditional distinction between the carriageway and the footway may be important both visually and historically, and cautions against the adoption of a single wall-to-wall surfacing. (DfT Traffic Advisory Leaflet 1/96¹¹)

¹⁰ [https://www.judiciary-ni.gov.uk/sites/judiciary/files/decisions/Toner%27s %28Joanna%29 Application.pdf](https://www.judiciary-ni.gov.uk/sites/judiciary/files/decisions/Toner%27s%20Joanna%29Application.pdf)

¹¹

http://webarchive.nationalarchives.gov.uk/20090511040538/http://www.dft.gov.uk/adobepdf/165240/244921/244924/TAL_1-96

- Kerbs assist with drainage systems which are better able to cope with exceptional rainfall and protect pedestrians than flush surface drainage systems
- Kerbs promote security and deter vehicles from mounting footways

The following action was included in the Department for Transport's recent consultation on an Accessibility Action Plan¹²:

“ We will continue our involvement with CIHT on their work on shared space. After we receive their report by the end of 2017, we will consider the recommendations and announce how we will take them forward.”

Following the publication of the CIHT report, and in light of its recommendations, the Committee believes DfT must now consider the need to revise LTN 1/11 as a matter of urgency.

In the meantime, Imtac calls on Government Departments in Northern Ireland to be aware of their duties under Section 75 and the Disability Discrimination Order. It asks them not to create town centres, streets and residential areas with shared space that discriminate against blind and partially sighted and other disabled people, effectively excluding them from the street environment. Furthermore, until there is an acceptable alternative delineator, Imtac calls for the retention of kerbed footways (line with DEM 154/15) with dropped kerbs at appropriate crossing points as an essential element of public realm in shared space design.

¹² [Accessibility Action Plan Consultation](#)