

## ANNEX A: RESPONSE FORM : DESIGNING STREETS COMMENTS

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<b>Section number</b> Indicate <b>chapter/section number and page</b> or 'general' if your comment relates to the whole document	<b>Comments</b> <b>Please insert each new comment in a new row.</b>
<b>Executive Summary (General)</b>	This document should cover Scottish Planning Policy only: there should be a separate document, probably a Planning Advice Note, providing the associated guidance and good practice information. Joint publication by the Planning Directorate and Transport department would be useful.
<b>Executive Summary (General)</b>	It would be helpful if an explanation could be given at the beginning of the document as to its fit with the rest of Scottish Planning Policy
<b>Executive Summary (General)</b>	The mentions within the document relating to SPPs and PANs should be fully updated to reflect the arrival of the 'new' approach to SPP.
<b>Executive Summary (General)</b>	Given that this document is 191 pages long, the Institute has restricted itself to comments on the initial sections aimed at defining Scottish Planning Policy: it is hoped that there will be a further opportunity to comment fully on the contents of any guidance, in the form of a draft PAN, in due course.
<b>Executive Summary Paragraph 1</b>	In recent years there has been very little in the way of successful place-making, and there is too little in this document on learning lessons from successful existing historic places, particularly where developments are occurring at the edges of existing settlements.
<b>Executive Summary Paragraph 2</b>	Phrases such as 'movement function' might be avoided: as a generality there is too much that is imprecise in the document. Clarity and freedom from jargon are particularly important in a Scottish Planning Policy.
<b>Executive Summary Paragraph 2</b>	Similarly, streets do not 'create places'. The document could be clearer and more focused if it was shorter in length.
<b>Executive Summary Paragraph 2</b>	The focus of the document should be about policy, not guidance.
<b>Executive Summary Paragraph 3</b>	The historic link referred to should be made clear.
<b>Executive Summary Paragraph 3</b>	Additional linkages should be made explicit to an understanding of local (ie of the locale) character, and to the views of the local community.
<b>Executive Summary Paragraph 4</b>	And when new roads are built they will tend to generate additional traffic and move bottlenecks.
<b>Executive Summary Paragraph 5</b>	It is important that the policy promotes the importance of design criteria relating to local context (place). This would also seem to

	be an appropriate location to introduce a 20mph maximum speed limit in built-up areas, on safety grounds.
<b>Executive Summary Paragraph 6</b>	The document should also promote the need for skilled designers, without whom successful placemaking is unlikely, as well as the involvement of local communities, and the taking of cues/understanding from existing places.
<b>Executive Summary Paragraph 7</b>	There are many good traditional examples which should be capable of being followed, though not in an ersatz manner.
<b>Executive Summary Paragraph 7</b>	Local really should mean local (of the locale) and not merely Local as in the Authority.
<b>Executive Summary Paragraph 7</b>	Principles and sound policy, however worthy, will only become a reality if they are implemented by skilled designers, and the SPP should emphasise this.
<b>Executive Summary Paragraph 8</b>	A policy encouragement to follow traditional local patterns, where appropriate, should be given. There should be a paragraph on the 're-design' of existing streets. In either case there should be character analysis (on the principles embodied in PAN 71?) to ensure that the best aspects of character survive and are enhanced.
<b>Executive Summary Paragraph 9</b>	First bullet: <i>local</i> must be clearly defined. Second bullet: 20mph limits should also be instituted in addition to any imaginative minimising. Third bullet: issues of defensible space should not be forgotten. Fourth bullet: there should be effective areas of private, semi-public and public space. Fifth bullet: not just future adaptation – places are used in different ways, on different days, and at different times of day and night. Sixth bullet: local materials should be used where possible – a reference to sustainability here?
<b>Executive Summary Paragraph 9</b>	Designing Places also highlighted the need for <b>BEAUTY</b> : <i>There is one other quality that many successful places have. Beauty, like the other six, should also be one of the objectives of urban design. It is less easy to plan for directly, but we may not need to. In a place that has the six qualities, beauty may well be the natural product of the patterns of human life and the skills of talented designers. (Designing Places)</i>
<b>Executive Summary Paragraph 10</b>	Key stakeholders should be listed
<b>Executive Summary Paragraph 10</b>	First bullet: the less able, old and infirm should be at the top Second bullet: including communities Third bullet: presumably the possibility of RCCs being done away with has been considered Fourth bullet: even greater need to involve local community and to relate any works to local character and distinctiveness Fifth bullet: see first bullet above Sixth bullet: flexibility and sustainability should be mentioned Seventh bullet: there should be some hierarchy, if only to prevent 'rat-running'. Eighth bullet: this needs to be in plain English. Streets are given character most frequently and importantly by the buildings which

	<p>define and enclose them.</p> <p>Ninth bullet: speed limits will also be needed.</p> <p>Tenth bullet: on-street parking is generally a feature of Scottish places.</p> <p>Eleventh bullet: see above.</p> <p>Twelfth bullet: any audit must assess outcomes in use as well as those predicted.</p> <p>Thirteenth bullet: there should be no over-riding reasons – 20mph restriction signs should only be at the entrances to such areas</p>
<b>Executive Summary Paragraph 11</b>	The policy framework should also address other roads, including motorways.
<b>Executive Summary Paragraph 12</b>	The Supporting Guidance (and some of the non-policy elements from the existing policy section) should not be included in this document but should appear as a Planning Advice Note
<b>Executive Summary Paragraph 13</b>	PAN 76 should be replaced, not withdrawn.
<b>Executive Summary Paragraph 14</b>	Surely there were architects involved in the multidisciplinary team: if not they should be given an opportunity to revisit the document. The primary research mentioned should be clearly referenced.
<b>Executive Summary Paragraph 16</b>	Perhaps the current position underlines the need for Scotland to have its own Planning Policy on this important topic, along with appropriate good practice guidance material.
<b>Executive Summary Paragraph 17</b>	There may be misunderstanding over the use of the word <i>local</i> in design terms here: this is not local as in local authority or even local development plan, but local as in <i>locale, place, the immediate setting, context, neighbourhood</i> .
<b>Executive Summary Paragraph 18</b>	SPP3 and SPP17 will very shortly be no more, being replaced by the third part of Scottish Planning Policy.
<b>Executive Summary Paragraph 19</b>	It would be preferable to see in this document key policies and principles applying to all Scottish roads/streets.
<b>Executive Summary Paragraph 20</b>	The Institute wishes to see the same level of high quality design and placemaking skill being applied to motorway design as to residential and other more domestic streets: there is essentially only a difference of scale, and we wish to see the best of design at each level in the roads/streets hierarchy. We see no reason why a set of 'place-sensitive' policies cannot be drawn up which encourages the production of high quality designs more widely.
<b>P6 Paragraph 1</b>	Most places were and are multifunctional. A need for security and defence has probably been a prime driver until relatively recent times.
<b>P6 Paragraph 1</b>	This landscaped layout is not, of course, historic: it should be identified and the designers credited.
<b>P6 Paragraph 3</b>	It would be appropriate to mention here the Conservation Area designation which has had a considerable impact on streets in particular and towns and villages in general over the last forty years in Scotland.
<b>1.1</b>	The differentiation between roads and streets is artificial and

	arbitrary. It may also carry the rather worrying implication that anything goes when dealing with a mere road.
1.1.1	See 1.1 above. Scottish Planning Policy documents do not require such jargon as <i>important public realm functions</i> . Streets are never <i>lined with... ..public spaces</i> , rather they may incorporate them as part of the street space.
1.1.3	The first line is extremely unclear. If what is meant is a <i>Radburn</i> layout ( <a href="http://en.wikipedia.org/wiki/Radburn,_New_Jersey">http://en.wikipedia.org/wiki/Radburn,_New_Jersey</a> ) then it should be so identified. There are some very positive advantages in the Radburn layout, and the analysis which is presented of its drawbacks is superficial and unworthy of an appearance as part of Scottish Planning Policy.
1.1.4	Again, some evidence to support these somewhat sweeping assertions (e.g. <i>does not create additional risk</i> ) would be appropriate. There can indeed be safety, health and social benefits in Radburn layouts. There is evidence suggesting that in some circumstances they encourage walking to local destinations, something which sustainable communities should surely seek to achieve. Aspects of safety, risk and liability should indeed be addressed together in this paragraph.
1.1.5	Evidence and references would be helpful here. It is considered that traditional Scottish settlements could provide many examples.
1.1.6	This ring of wishful assertions requires evidence for it to be taken seriously as an element of Scottish Planning Policy.
1.1.7	What is a <i>sustainable place</i> and how is it to be <i>delivered</i> ? At the very least a sensible definition is required.
1.1.8	The term lane is not a common nor traditional one in Scotland. Narrow roads as described could be Loans, perhaps, or even Gaits. Walking, cycling and horse-riding all involve movement – it is not clear exactly what point is being made here.
1.2.1	Functions may change and adapt to the place: there may well be further rewards from examining and taking cues from traditional Scottish settlements in the vicinity of the site in question.
1.2.2	Which type of road planning? Such edge-of-settlement monocultural expansions are by no means restricted to the New Towns: this has been the norm of the majority of post-war planning, and at least the New Towns took its effects into account, unlike in many of the unfortunate ‘anytown’ residential carbuncles afflicting the more traditional settlements of Scotland.
1.2.3	If this is the new policy it must be made clearer and more explicit. In addition it would be helpful to have a reference to any definitions of these terms, including <i>walking distance of most residents</i> . It would also be useful to discuss here policy differences between new places and additions to existing ones.
1.2.4	<i>Rat running</i> should be mentioned here.
1.2.5	Policy should stand alone without the need for guidance references, which should be in a separate PAN.

1.2.6	This is an artificial classification. Additional aspects for consideration might be markets, shopping, civic purposes, recreation, townscape, scale, and beauty. Street lighting has more to offer and should be considered separately from drainage and utilities as an apparent afterthought.
1.3.2	Spaces do not frame things. This is a basic misunderstanding.
1.3.3	The sense of place is so important to the thrust of this new policy that its definition and that of its components must not be relegated to Guidance – it is perhaps <i>the</i> crucial aspect of this Scottish Planning Policy. Aspects to cover should include history, townscape, building character, scale, colour, orientation, shelter, microclimate and so on.
1.3.4	Designers do not understand the need to cater for motor vehicles. In particular, they (and others) do not understand the need to limit and control in certain circumstances in order to create liveable places of character that fit well with existing Scottish settlements. Access to public service vehicles might be a case in point. The Scottish Planning Policy should address this, as well as the other items listed: it is not sufficient to deflect the policy need to some area of guidance, however apparently official in nature. Policy on links to public transport and local community facilities, and the relevance of local character, is particularly required.
1.3.5	A reference to security and defensible space would be helpful, along with an indication of what traditional Scottish approaches would be to these issues in the local area.
1.3.7	More confusion of policy and guidance in the same document.
1.3.9	As 1.3.7
1.3.10	Street lighting should be considered to be a key element of place-making. It should have its own section. Bespoke-tailored designs should light buildings, define spaces, highlight key buildings and other important townscape features, and above all relate to the scale of spaces in a subtle way, without resorting to the ersatz.
1.4.2	Reference to <i>the upper tiers</i> is unclear and unhelpful: is this repeating an earlier point?
1.4.3	Should this refer to <i>higher</i> -speed roads? Which hierarchy is being referred to here? Presumably it is an incorrect one if it doesn't cover one of the more typical street categories?
1.4.4	The second sentence here has a large phrase repeated in error. Even in the cases of motorways and trunk roads there should be careful consideration of <i>place</i> issues (see points made above). No new road should be designed and constructed without such careful thought and appreciation for context and neighbours, never mind users.
1.4.5	Place status requires a more helpful, clearer definition if the concept is to have any weight as an aspect of Scottish Planning Policy. Important places <i>can</i> exist along arterial routes, in district centres, <i>in</i> local centres and within neighbourhoods.
1.4.6	To this list should be added key buildings, especially public ones,

	and historic places.
<b>1.4.7</b>	Other relevant factors would include noise, air quality, accidents and other measurable effects. There may be other psychological factors.
<b>1.4.8</b>	If this is published, perhaps links could be provided. If not, perhaps it should be.
<b>1.4.9</b>	Should significantly replace slightly in the last line? It is not clear exactly what policy point is being made here.
<b>1.4.10</b>	As stated above, the Institute does not agree with the downgrading of 'place' with reference to motorways and trunk roads.
<b>1.4.11</b>	This is far too narrow an approach. Genuine designers would look at a wider range of factors, many of which have been touched on in the document already. These should all be listed, with existing character certainly one, and this should also be linked back to Character Appraisal.
<b>Figure 1.3</b>	This is misleading and has no place in Scottish Planning Policy, since it suggests that there is no need to consider seriously 'place' in the design of motorways and trunk roads. We need the best of design at all scales of 'road movements'.
<b>1.4.12</b>	It will be important to establish the character of the place, including its historic character, and for the selector of design criteria to have an appropriate grasp of good design.
<b>Figure 1.3</b>	Melrose is an outstanding Conservation Area. The introduction of a one-way system has significantly reduced its 'place' function, and the 'pedestrianisation' scheme does not contribute positively to or enhance the existing character. Perhaps, like Culross, there may be better (and cheaper) examples of the successful emergence of 'place' versus movement in historic settings.
<b>1.5</b>	This should surely be at the front of this Scottish Planning Policy document.
<b>1.5.1</b>	What is required is a crisp statement of Scottish Planning Policy. This is not it. Inter alia it is not clear what is meant by <i>street design which engenders place and quality</i> .
<b>1.5.3</b>	The Scottish Planning System has been well-served by an approach which has three elements – Scottish Planning Policies (policy), Planning Advice Notes (good practice guidance), and Circulars (interpreting statutes). Such an approach should be followed here.
<b>1.5.6</b>	A careful examination of context and successful local places would seem helpful. It is not clear from this exactly what the evidence base is that underpins Designing Streets – at the very least some referencing is required.
<b>1.5.7</b>	See discussion above on the problems of <i>local</i> as a key term capable of many differing definitions. For technical judgements should be read <i>design judgements</i> : it is important that design skills can be brought to such considerations tailored to individual <i>local</i>

	circumstances.
<b>1.6</b>	Much of this section is too technical for the ordinary reader, and is not policy: it should be rewritten in plain English and relocated in a Planning Advice Note.
<b>1.7</b>	The views of the local community should always be sought. The Local Planning Framework, and the Development Plan more generally, should be a key starting point. Under Objectives/Purpose <i>considering</i> would be a better term than balancing. Sustainability should have a capital S. Skilled designers should develop the design. It is not clear who ought to be carrying out the Quality Audit, but in significant part this should be <i>an assessment of outcome in use</i> , not merely theoretical.
<b>1.8</b>	Scottish Ministers' policy is not clear from this section.
<b>Figure 2.1</b>	This is an example of either poor computer photograph management or bad access design (that is, over-wide and ugly or both).
<b>2.1.1</b>	There was not sufficient historical context mentioned earlier to make this an accurate statement. There should also be an explicit reference, here or elsewhere, to the need for high quality architecture as a key component of successful street design. There should be reference here also to a fitting-in with the existing character of (local) places.
<b>2.1.2</b>	Streets are spaces and their defining buildings (occasionally supplemented by natural features). The SPP references should be updated. There should be a reference to Designing Places page nos.
<b>2.1.3</b>	There should be some reference to existing streets and their re-design, repair and enhancement: this should start from a genuine understanding of their character and significance.
<b>2.1.4</b>	Sustainable transport policy should be referenced.
<b>2.1.5.1</b>	Local seems to be used correctly here: perhaps the second sentence should end with ... <i>immediate</i> surroundings.
<b>2.1.5.2</b>	A reference to both day and night would be helpful. Lighting is also relevant here.
<b>2.1.5.3</b>	There should be a specific mention of connection to public transport and to community facilities.
<b>2.1.5.4</b>	Defensible space?
<b>2.1.5.5</b>	Networks should be capable of being planned based on existing local ones, seamlessly or otherwise.
<b>2.1.5.6</b>	There should be a policy reference to sustainability here.
<b>2.1.5.7</b>	There should be a reference to the 7 <sup>th</sup> virtue from <i>Designing Places</i> , that being <i>Beauty</i> .
<b>2.1.6</b>	The phrase <i>poorly designed streets can make it impossible to</i>

	<i>achieve good design</i> , could be omitted as its meaning is unclear
2.1.7	Perhaps such an optimistic statement should be in the Introduction?
2.1.8	There should be another reference to beauty. Public consultation should be explicitly required. Diversity and difference should be acknowledged with reference to local distinctiveness and character, as well as highly-skilled designers.
2.2	If these are actually the key policy principles then they ought to be at the start of the document. They also ought to be individually numbered for ease of reference. As it is, the unnumbered Figure below 2.2.1 is unhelpful.
2.2.1	It is not clear what is meant by <i>...the key qualities of successful places that (the principles) can impact upon</i> .
2.3.1	The present Government's key objectives should not form part of Scottish Planning Policy: it should be expected that the SPP will look beyond the next election. The policy linkages diagram is another unnumbered Figure. It is not an aid to understanding this Scottish Planning Policy.
2.4	Surely this should be at the beginning of the document.
2.4.1	Perhaps they should be stakeholders rather than organisations, and to that list should be added communities and designers
2.4.3	This can be omitted following the additions to the list of stakeholders above.
2.4.4	This could be included in the introduction...
2.4.5	This paragraph could be omitted.
2.5.2	Contact should be focussed through the Local Authority Planning Case Officer.
2.5.3	Mention should be made of the value of pre-application discussions, and their necessity in some cases under the 2006 etc Act.
2.5.4	A reference is required. If it is now policy then this should be made absolutely explicit.
2.6.1	This should be at the start of the document. Is DMRB superseded? If so, say so.
2.6.2	Designing Streets should apply to all roads, whether trunk or not.
2.6.4	There are six uses of the word <i>local</i> in the nine lines of this paragraph, and at least three different meanings. A revised version of this paragraph should be relocated to the start of this document, but it should be made clear that <i>local</i> , in the context of individual streets and roads, should mean within that locale; that is, say, within 500m of the place in question.

<b>3</b>	This is principally guidance, and would be better in a PAN.
<b>3.1.1</b>	The design process might be more helpfully thought of as containing elements of the following (planning) sequence: Inception Survey Analysis Plan Programme Implementation Monitoring Review 'Establishing the Vision' might be omitted.
<b>3.1.2</b>	Design decisions should also reflect the Planning Framework. Scottish Planning Policies must not be <i>pragmatically interpreted on a case-by-case basis</i> – that would seem to be a lawyers' charter, defeating the purpose of having any kind of sensible policy framework in the first place, and with potential ramifications for all other SPPs. Is what is meant here something like a reference to a lack of rigidity in application? That would be a very different thing. There should also be an element of audit or testing following implementation of scheme designs and their operation in practice.
<b>3.1.3</b>	This is guidance.
<b>3.2</b>	This section should reflect the new Planning Hierarchy and the need for community engagement.
<b>3.2.2</b>	Coordination should be undertaken in each case by an individual who is a key member of the Council's planning staff: ideally it would be someone with design expertise as well as knowledge of the physical context of the place involved.
<b>3.2.3</b>	The unnumbered or titled Figure below 3.2.3 is guidance, not Policy.
<b>3.3</b>	This is guidance, not policy.
<b>3.3.1</b>	Does this reflect the Planning Hierarchy? It must stress the need for a highly-skilled designer.
<b>3.3.2</b>	It will be necessary to be sure that the current version of PAN 81 reflects accurately the requirements of the 2006 Act. The Act is missing an <i>etc</i> in the first sentence.
<b>3.4.1</b>	This misunderstands the design process. The elements which are covered in 3.4.3 should be the starting points for any brief. <i>Visions</i> have no place in the design process, unless as part of a brainstorming exercise once the problems are identified and a range of potential solutions are being sought.
<b>3.4.2</b>	...range of stakeholders, <i>especially the local community</i> .
<b>3.4.3</b>	Perhaps mention of these key starting points should be made in 3.4.1.
<b>3.4.4</b>	Where do the aims come in if the <i>vision</i> is no more than a set of objectives?

3.4.5	Objectives should be <i>SMART</i> : Specific, Measurable, Attainable, Relevant and Timebound. Unfortunately, the examples given fail on almost all counts. This matters particularly when it comes to assessing the outcomes in practice.
3.4.6	Street design should also be consistent with local physical context, which must be evaluated prior to <i>the identification of the required key design principles</i> .
3.4.7	Local <i>Development Plan</i> . There must be a thorough understanding of the <i>local</i> place before setting out any design principles or <i>vision</i> (see 3.4.6 above).
3.5.1	An understanding of context is too late by now if objectives are already set. Perhaps more relevant to contextual survey identifying distinctiveness and sense of place will be the contents of PAN 71 on character appraisal and Conservation Area Management: it has wider application and fits with Designing Places.
<b>Figure 3.1</b>	This shows no local context at all – it is a broad-brush strategic diagram.
3.5.3	It will be interesting to see how this is done in practice. To the list of local destinations must be added <i>public transport access points</i> .
<b>Table 3.1</b>	It would make easier reading if all figures were titled as Figures. This table repeats earlier information. Children, the old and less able should also be mentioned in the top rank.
3.6.1	According to earlier paragraphs, it was thought that <i>vision</i> should be established much earlier in the exercise: perhaps this entire chapter 3 should be reassessed. Perhaps the RIBA Plan of Work would be a helpful starting point.
3.6.2	Design development is not <i>evolved</i> . Designs are generated and developed. Options are actually scenarios. Care is certainly required to design the movement network, but it is not correct to say that it requires <i>as much careful consideration as the design of the buildings</i> .
3.6.3	The term <i>Transportation Assessment</i> requires to be introduced and properly explained. Has it a role in Scottish Planning Policy or is it again something which should feature in a Planning Advice Note?
3.6.4	Context and identity are surely part of the same thing. It is not clear what Scottish Guidance is being referred to here. If these issues are significant they should be raised and addressed in this Scottish Planning Policy – if not, they should form part of Guidance in the shape of a Planning Advice Note: the current mix of policy and guidance is unacceptable. If there must be references to other sections then page, paragraph and/or Figure numbers should be given.
3.6.5	This is not policy.
3.6.6	There is no clear link shown (or known?) between stakeholder consultation and the creation of a sustainable community.

<p><b>3.6.7</b></p>	<p>Engagement with stakeholders, especially local communities, should take place regardless of the scale of the site. A common vision may be an unlikely outcome. There should be at least two initial stages – establishing local knowledge and context (survey), and then establishing robust proposals (analysis and plan).</p>
<p><b>Figure 3.3</b></p>	<p>Southwest of the town there is a golf-course and the river, making expansion infeasible in this direction, so it is difficult to appreciate the point that is being made here. Ballater was the birthplace of Patrick Geddes in 1854.</p>
<p><b>3.6.8</b></p>	<p>...Street character types should be developed by considering <i>local context and</i> the space requirements of people and vehicles rather than through the application of standardised widths relating to dwelling numbers. <i>If appropriate to the local grain of the place, a hierarchy should be established...</i> As indicated previously, buildings enclose and form streets, not buildings <i>and space</i>.</p>
<p><b>3.6.10</b></p>	<p>Context, townscape, grain, scale, and street lighting are all features which should be added to this list. Again, though, this is more Guidance.</p>
<p><b>3.6.11</b></p>	<p>...positively to the <i>context and</i> character of the <i>local area</i> in order to make a good place.</p>
<p><b>3.7.1</b></p>	<p>Masterplanning should be a creative process: it is not merely iterative: the final solution will almost certainly NOT meet ALL policy, design, economic and social aspirations: to that list should be added environmental and sustainability aspirations: are objectives rather than aspirations what are being targeted here?</p>
<p><b>3.7.2</b></p>	<p>QA systems should be properly introduced here. There should also be an audit of the quality of the actual outcomes in use. Quality Audits will require to be carried out by <i>skilled designers</i> before and after implementation. In their absence perhaps a Design Review Panel could be used.</p>
<p><b>3.7.3-14</b></p>	<p>This is all guidance, and unfortunately describes processes which cannot be relied upon to ensure good quality <i>places</i>.</p>
<p><b>3.8.2</b></p>	<p>This seems unlikely to be achieved in practice, and it should be remembered that not all development will be processed through outline planning permission, especially if there is already an adopted Local Development Plan proposal dealing with it. All of this material is Guidance and should not be part of a Scottish Planning Policy.</p>
<p><b>3.8.6</b></p>	<p>There should be community consultation. The roads authority should not be both designer and approving body. The planning authority should have a key role here, with some form of skilled designer signing off any schemes. This is especially important in existing situations. Reference should be made especially to Conservation Areas. In all schemes, but especially those dealing with existing streets, there should be an appreciation of local spatial and historic context.</p>
<p><b>3.9.4</b></p>	<p>Codes will work successfully only if the landowners, <i>communities</i> and local authorities which use them have the necessary</p>

	knowledge, skills, understanding and <i>confidence</i> to...
<b>3.9.5</b>	If a Scottish example can be provided it should be used. But of course this is still Guidance...
<b>3.9.7</b>	Local Authority officers involved with Road Construction Consents will require an appreciation of design issues and technical support in this area.
<b>3.10.2</b>	This is too loose: the point of a Master-Plan is that it provides a publicly-accepted development framework which must not be unpicked unless, for example, through the review of the Development Plan (particularly the Local Development Plan)
<b>3.10.4</b>	There is a significant difference between monitoring and review: this paragraph is talking about the need for review.
<b>3.11.2</b>	Additional bullet points should include <ul style="list-style-type: none"> <li>• Sustainability</li> <li>• Use of local context/character to be encouraged to allow more organic settlement growth</li> <li>• Examination of local context and character appraisal</li> <li>• The Planning Framework (especially the Local Development Plan)</li> </ul>
<b>3.11.2.1</b>	Reduction of clutter is mentioned here for the first and only time as a policy objective.
<b>3.11.2.2</b>	Is this a reference to SUDS or situations where defensible space considerations come into play? Greater clarity is normally required in Scottish Planning Policy.
<b>3.11.2.3</b>	Where appropriate! Should there be a 20mph speed limit in urban areas?
<b>3.11.2.4</b>	It is <i>onerous</i> . This seems a remarkably similar point to 3.11.2.3.
<b>3.11.1</b>	This paragraph might be more focused. It should stress the need for early engagement of expert designers who appreciate the importance of the sense of place and genuine place-making.
<b>3.11.2</b>	Policy (and this should really include discernable principles) ought to be within this Scottish Planning Policy, but all guidance ought to be removed and restructured into a Planning Advice Note. Has the (unnumbered) Figure below (clearly part of guidance not policy) been revised to take fully into account the 2006 etc Act?
<b>General</b>	Due to the length of the consultation document, and the Institute's wish that Policy and Guidance be more effectively separated, no comments are offered on material contained from page 42 onwards. If pages 1-41 are indicative, it is possible that there will be elements of policy included in pages 42-191, and (if any) it is hoped that these will be identified and properly positioned in a restructured Scottish Planning Policy more akin to earlier companion documents in the series: indeed it may make more sense for the policies in this draft document to be added to the third part of the revised Scottish Planning Policy.

