

Consultation Response

Guidance on inclusive design for town centre and busy streets consultation

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Question 1: Please give us any comments relating to Principle 1 and what it is trying to achieve?

RTPI Scotland broadly support the intention of this Principle. We recognise and support the need for communities to have greater influence in the local decision- and design-making process.

The reforms to the Scottish planning system that are currently in the process of being implemented seek to improve equitable community involvement in the planning system, through various mechanisms, policies, and guidance.

However, it is unclear what makes this Principle unique to the design of town centres and busy streets. This Principle is equally important for all types of projects and policy proposals. For this guidance to add value to the design of town centres and busy streets, it would be more beneficial for this Principle to focus on the “Why” specific to this context. In other words, what are the implications for communities when they are not adequately engaged with respect to decisions that impact upon town centre and busy street environments? What are some of the poor physical outcomes that result because of poor engagement practices in these contexts. Going into the specifics related to the context of town centres and busy streets, including providing real world case studies or hypothetical examples of poor engagement methods that have or can result in poor design outcomes, would better relate the guidance to town centres in way that is practical for design teams and decision-makers.

In its current form, it is unclear how this Principle will assist design teams and decision-makers in undertaking the right engagement methods to help inform decisions around town centres and busy streets in a way that adds value to the plethora of other guidance that is currently available on the topic of community engagement.

As an aside, w the link to the Participation Framework in the introductory paragraph to Part One of the draft guidance is broken.

Question 2: Please give us any comments relating to Principle 2 and what it is trying to achieve?

We agree that engagement should start early at the concept stage of a project and continue throughout a project’s lifecycle into the post-completion stage. However, this Principle is not unique to the design of town centres and busy streets. It is unclear what value this Principle will add to design- and decision-making practices in this context.

Much has been written on the topic of community engagement, and there is much guidance available on the subject generally. With the wealth of guidance available, it is unclear what this guidance adds.

It is also unclear who the target audience of this guidance is and who is responsible for implementing and enforcing the various Principles set out therein (including Principle 2).

The guidance states that it is for “those involved in designing or delivering street improvements or adjustments”. This is a broad spectrum of society, and consequently

where and with whom the responsibility lies in delivering, monitoring, and enforcing the principles is unclear.

RTPI Scotland has for a long-time expressed concern that current constraints on resourcing and funding could continue to act as a barrier to the successful implementation of effective community engagement practices, which are resource intensive in terms of time, staff, training, and finances.

RTPI Scotland's 2023 update to the Resourcing the Planning Service research reveals that local planning authorities are under mounting pressures to deal with increasing workloads within a financial climate of shrinking resources. It is imperative, therefore, that they are adequately resourced with the necessary skills, training, and staff to advance the principles set out in this draft guidance.

It is also critical that we do not take a siloed approach to community engagement. A holistic and coordinated approach should be taken to achieve wide-reaching impact.

Question 3: Please give us any comments relating to Principle 3 and what it is trying to achieve?

We agree with the importance of using accessible materials and language when engaging with communities. However, we would reiterate our previous point that this Principle is very broad and could easily relate to community engagement on any project, not specifically town centre and busy street design. It is, therefore, unclear how this Principle relates specifically to (and will support) the design of town centres and busy streets. It would perhaps be more useful if the guidance provided more explicit examples of what engagement materials are considered particularly useful to aid in the design of town centres and busy streets, and how these can be made more accessible in practice (through both in-person and digital engagement methods). This could include examples of what inaccessible material and language look like compared to more accessible material and language.

We also note that the link provided in the consultation paper relates specifically to making a website or mobile app accessible. Whilst this is useful and some engagement will no doubt take place on website and mobile application platforms, these are not the only forms of digital engagement and participation methods available, and it appears to miss an opportunity to explore other digital engagement methods and the associated challenges and opportunities that they would bring to engaging with communities on the design of town centres and busy streets.

Question 4: Please give us any comments relating to Principle 4 and what it is trying to achieve?

This Principle aligns with current thinking about the benefits of engaging a broad spectrum of the community who know their area best. However, the guidance is unclear about what mechanisms should trigger its implementation. It is also unclear who is responsible for enforcing compliance and in what circumstances. Given the resource intensive nature of community engagement it is critical that it is undertaken in a holistic, collaborative, and coordinated manner.

It is also disappointing that the guidance does not acknowledge the needs of other under-represented groups, including children and women and girls (as examples). There is much research on the lack of attention that children and women have been paid in the design of our built environments that must be given attention.

The needs of disabled people are not necessarily all going to be the same. There are many nuances within this around the type of disability, as well as a person's age and gender (and other factors). A town centre that caters to an adult male who is partially sighted, may not meet all the needs of a 10-year-old female who uses a wheelchair. We feel this guidance fails to have adequate regard to the many nuances that make up the

fabric of place-making and the communities for which our town centres and busy streets need to serve.

Also, this “How” Principle does not cover how the engagement should be undertaken. Although the Annex includes a link to the Place Standard Tool, it does not discuss the important role this tool can play in taking a place-based approach to designing our town centres and busy streets in partnership with communities in line with the Place Principle – of which there is also no mention in this draft guidance, and which will be integral to implementation of the guidance.

Question 5: Please give us any comments relating to Principle 5 and what it is trying to achieve?

This Principle relies heavily on the National Standards for Community Engagement, which are well established guidelines. Although the draft guidance attempts to relate the 7 standards back to street design, the majority of the content provided under each of the ‘street design’ subheadings remain quite broad and could just as easily be applied to any project or proposal as they could to the design of town centres and busy streets.

Consequently, and as we have previously stated earlier in our response, it is unclear how this guidance adds value to existing guidance in such a way that will assist design teams and decision-makers in the design of town centres and busy streets.

Question 6: Please give us any comments relating to Principle 6 and what it is trying to achieve?

We broadly agree with the intent of this Principle. However, it is unclear how it is intended to be implemented. For example, it is unclear if this guidance is to be targeted towards new town centre development or the regeneration of existing town centres (or both). It is also unclear what processes, mechanisms, and stakeholders this guidance is seeking to influence. For example, is it intended that this guidance be used by local planning authorities in their local development planning processes or when determining planning applications? Or could the guidance be utilised by communities when undertaking their local place plans? This lack of clarity leads us to question the impact that this guidance will have in practical terms. The planning system in Scotland is undergoing change. The planning profession are grappling with a vast number of new regulations, policies, and guidance. Our members tell us about the need for certainty and clarity in terms policy implementation and associated guidance. Guidance needs to be clear in its intent, purpose, and function. It also needs to establish its intended audience in terms of who is responsible for its delivery, in what circumstances, and through what processes. We are concerned that this draft guidance does not achieve these aims.

Related to the above, Transport Scotland’s Cycling by Design guidance is referenced in this draft, and we note that it includes a lot of technical detail on the design of segregated cycling infrastructure in line with the outcomes of this Principle. However, it is unclear what this draft guidance on town centre and busy streets adds to the Cycling by Design guidance. More clarity and explanation about how this draft guidance will enhance (rather than merely duplicate) already existing guidance, such as Cycling by Design, would be useful.

Question 7: Please give us any comments relating to Principle 7 and what it is trying to achieve?

We feel this Principle takes a far too simplistic approach. The Principle sets out design measures that can be adopted in an ideal scenario, but it fails to demonstrate how the

principles (including Principle 7) can be successfully implemented in situations where there may be physical constraints applicable to the context of a particular site in terms of, for example, existing roadways that are unable to accommodate pavement widths of 2 metres, the presence of vegetation with biodiversity significance, the potential unintended consequences of removing all bins, benches and other street infrastructure deemed to be an obstruction etc. We also note that street furniture is permitted development. Consequently, local planning authorities will have limited ability to influence this outcome through their development management duties under the Town and Country Planning (Scotland) Act 1997.

With regard to the biodiversity point mentioned above, this Principle fails to acknowledge the potential biodiversity significance that landscaping can play in urban centres, or the importance of landscaping in achieving our climate change mitigation and adaptation ambitions, particularly when incorporated into Sustainable Drainage Systems.

Matters of inclusivity and equity should be embedded in all the work that we do and not sit separately within a siloed document. We note that *Designing Streets* (also referenced in this guidance) was published in 2010 and requires updating to more accurately reflect current policies around (for example) 20-minute neighbourhoods, addressing the climate crisis and nature emergency, as well as more effectively embedding the type of inclusive design principles. We believe that greater benefit would be served by updating *Designing Streets*, rather than adding an additional layer of guidance to sit alongside it.

Question 8: Please give us any comments relating to Principle 8 and what it is trying to achieve?

We agree that the right road crossings in the right places are crucial to enhance confidence in navigating through town centres and busy streets, particularly for disabled people, as well as for the elderly and children.

However, it is important to understand who the targeted audience is in terms of implementing and enforcing this design Principle, through what processes and using what mechanisms.

Also, we believe that the draft guidance in its current form has missed an opportunity to set out useful evidence about the sorts of barriers that people face in town centres and busy streets having regard to the 9 protected characteristics. Setting out the evidence in terms of real-life examples balanced with best practice examples of how to tackle these barriers in design terms would, we believe, provide designers and decision-makers with a useful reference tool that could more practically influence physical outcomes in our town centres and busy streets. For example, in relation to crossings, showing how a particular crossing in the wrong location can negatively impact disabled people, the impact of signalled crossings that don't allow certain people sufficient time to cross etc.

We are also disappointed to see the lack of attention in this guidance to the different ways people experience town centres and busy streets at different times of the day and the important role that different design measures can play in tackling issues of safety in our town centres, both real and perceived. For example, women often report feelings of insecurity when navigating around town centres after dark, feeling obliged to choose less sustainable transport options or taking more indirect routes to feel safe. Design has an important role to play in tackling these types of issues, and we therefore feel this draft guidance represents a missed opportunity.

Question 9: Please give us any comments relating to Principle 9 and what it is trying to achieve?

We broadly agree with the intent of this Principle and acknowledge the importance of choosing the right materials to support accessibility, durability, and navigation through

our public spaces. We also agree that maintenance is critical for the long-term viability of public spaces, including town centres and busy streets.

However, it is unclear who the intended target audience of this guidance is and who is responsible for implementing and enforcing this Principle and through what processes and mechanisms. As previously mentioned in our response to Question 2, the introductory paragraphs of the guidance state that the guidance is for “those involved in designing or delivering street improvements or adjustments”. This could reasonably include, local authorities, private developers, infrastructure providers (to name just a few). The guidance also states that it “will be of interest to individuals who use these areas” including disabled people, community groups, and disabled people’s organisations. This is a broad spectrum of society, and consequently where and with whom the responsibility lies in delivering, monitoring and enforcing the Principles in this guidance is unclear. This lack of clarity leads us to question the impact that this guidance will likely have in practical terms.

Question 10: Please give us any comments relating to Principle 10 and what it is trying to achieve?

We agree with the key points outlined in this Principle. However, we reiterate that the guidance lacks clarity on who is responsible for actioning and enforcing these initiatives and through what processes and mechanisms. There also appears to be a lack of attention paid to how the various “Key Considerations” relate to what local authorities (including planning departments) and other organisations (in the public, private and third sectors) are already doing, and how these initiatives can work together to deliver the outcomes of the draft guidance. This requires a collaborative place-based approach to the design of our town centres and busy streets that can be achieved through operationalising the Place Principle to improve coordination between stakeholders, enhancing collaboration and communication across local authorities’ departments, key agencies, NGOs, communities, and the private sector. We therefore stress that greater consideration of and reference to the Place Principle and place-based approaches to the design of town centres and busy streets throughout this guidance is essential.

This draft guidance risks having limited impact in practical terms on the town centres and busy street design unless it can provide greater clarity on:

- The value it adds to guidance that already exists (i.e., to ensure that it enhances rather than duplicates existing guidance).
- Who the guidance is for, when and in what circumstances it should be applied, using what mechanisms, and who is responsible for monitoring and enforcing its implementation.
- How the Principles set out in the guidance relate specifically to the unique context of town centres and busy streets. This could be addressed by using real world and/or hypothetical case studies and best practice examples to better relate the guidance to the specific context of town centres and busy streets in way that would provide practical evidence and advice to design teams and decision-makers.