



for sustainable transport

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Monday 23rd March 2009

Dear Sir/Madam,

Consultation on *Designing Streets*

Thank you for seeking our views on this draft policy and guidance.

Our detailed comments on the document are appended.

In general, we think this a very welcome document. In particular, we welcome the support for a user hierarchy which places pedestrians first; the statement that 20mph to be the standard maximum speed limit on residential roads; and the general emphasis on 'place' being a more important function of streets than 'movement' (particularly for residential streets and high streets).

Yours sincerely,

Colin Howden
Director, Transform Scotland

Transform Scotland is the national alliance for sustainable transport, bringing together the public, private and voluntary sectors.

Transform Scotland is a member of the European Federation for Transport and Environment.

Section number	Comments
1.4.10	We don't agree with the suggested assessment of residential streets as having the same 'place' function as that of 'movement' function. Residential streets should have higher 'place' status than 'movement' status. We recommend changing the 'place' status in the Place and Movement Matrix (Figure 3.1) to "medium to high".
1.4.14	Is this meant to be a good practice example - i.e. one showing good 'place' function as well as 'movement' function? If so, why are there no people using the space? We recommend replacing with image which demonstrates actual usage of a newly designed space (or different image of same location if this is indeed a successfully designed location).
2.4.1	We are surprised that this list (the audience for <i>Designing Streets</i>) makes no reference to local residents or even local community organisations (such as Community Councils or Residents' Associations). This would seem to go against the statement in §2.1.8 that <i>Designing Streets</i> should "place people at the heart of the design process". We recommend adding "local residents, residents' groups, and local community organisations (e.g. Community Councils)" to the bulleted list at §2.4.1.
2.6.4	This section states that it is "essential that local authorities review their standards and guidance to embrace the principles of <i>Designing Streets</i>". We support this demand, but the document does not set out any timescale or process for this to happen, or any sanction should local authorities not revise their local design guidelines. We recommend that <i>Designing Streets</i> set out a timescale within which local authorities will be expected to revise their local design standards to reflect the policy and guidance set out in <i>Designing Streets</i>.
3.5.5	We welcome the user hierarchy set out in this section.
3.6.7	Figure 3.3 is unclear. It states that "the ability for future growth [of Ballater] is not compromised in the south-west of the village". We trust that the Scottish Government is not recommending that construction takes place on the land of Ballater Golf Club (which occupies the area to the south-west of Ballater)! We recommend that the caption on Figure 3.3 be revised.
G1	The image at the start of this section is inappropriate - as it shows what appears to be a below minimum-width pavement (and one which could be said to suffer from a poorly placed postbox). We recommend replacing with a more appropriate image - perhaps one showing "good layout and connectivity".

Section number	Comments
G2	The image at the start of this section is inappropriate. Firstly, it is a 'place' dominated by a grey, tarmac road, with most space given over to vehicles. Secondly, it is an image noticeable by a complete absence of people. Thirdly, the pavements look to be below minimum-width. We accept (§2.11.1) that the image does show use of a “vernacular” style - but this does not in and of itself make this a “quality place”. We recommend replacing with a more appropriate image - perhaps one showing a “quality place”.
G2.2.4	Is Figure G2.2 meant to be a good practice example or a bad practice example? The caption text “masterplan-led approach with bespoke housing design” would suggest that this is being flagged as good practice - but we find this image to be an excellent example of poor practice in urban design: most road space given over to vehicles, a grey, sterile street environment, and bland housing. We recommend replacing this image with something more appropriate - or, alternatively, flag this as a bad practice example.
G2.5.1	The caption to Figure G2.5 suggests that the first image provides a “pleasant living environment”. To us, it just looks like another street dominated by unsightly car parking. We recommend replacing this with a more appropriate image.
G2.8.2	We agree with the sentiment expressed in the caption for Figure G2.8 - but the image is marred by a complete absence of evidence of people using the street furniture, which raises doubts about whether the street furniture shown here does indeed “add to the local amenity”. We recommend replacing this with an image with some people in it.
G3	We don't like the image at the start of this section. Is the youth cycling on the pavement (and who doesn't even look like he's paying attention to where he's going) a representation of “streets users' needs”? We recommend replacing with a more suitable image.
G3.1.4	Are we to understand that it is OK to have cycle commuter routes that are dangerous to its users, just as long as they are not dangerous to child cyclists? And how realistic is it to suggest that parallel cycle routes be provided (final sentence), one for commuter cyclists and one for child cyclists (especially in the context of the often dense urban form of Scottish towns and cities)? We think this paragraph could be usefully re-thought and re-written.
G3.6.3	We welcome the reference to, and image of, the Slateford Green car-free development. However, we consider that more should be made in <i>Designing Streets</i> of this type of design. We recommend adding more content on car-free development. We consider that this deserves a section of its own, and not just referred to in the context of car parking.

Section number	Comments
G4.2.8- G4.2.9; G4.2.16	We welcome the positive references to shared surfaces and Home Zones. However, these remarks are unbalanced in as much as they are immediately followed by heavily critical remarks attributed to disability groups. In our view, Home Zones, and other shared surface developments, are a key element in transforming the quality of urban residential areas; they already do across continental Europe and Home Zone principles are increasingly also being incorporated into design in North America. As such, we consider this section to be unduly negative about Home Zones and other shared surface developments. We recommend that the sections on shared surfaces and Home Zones be revised to reflect a more balanced view on the wide range range of benefits of this form of development.
G4.2.23	What is the purpose of Figure G4.10? It bears no relation to the section above (which is about Home Zones). We recommend deleting this image, or moving it elsewhere in the document.
G4.3.19	Figure G4.14 is an example of attractive street design. It is a shame that so few of the other images used in this document show similar value. We recommend that more work be done to find attractive, and where possible Scottish, examples of street design.
G4.4.7	We welcome the general support for designing for traffic speeds of 20mph or below. However, 20mph is often still too high a traffic speed for successful residential streets. Home Zones, for example, are generally designed for traffic speeds of around 10mph. Therefore, we consider the statement that “Designers should note that [...] approval [for lower speed limits] is unlikely to be given“ to be deeply negative. We recommend deletion of this sentence.
general	We find the document to be overlong and somewhat repetitive. It also contains a number of typos. We recommend that it receives a good edit before final publication.
general	We find the document to be overly discursive. We recommend that the document be re-written to be more specific and more assertive.