

Research into the Implementation of Designing Streets Policy Across Scotland

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1. INTRODUCTION

In 2010 the policy document [Designing Streets](#) (DS) was launched as the first policy statement in Scotland for street design. It marked a change in the emphasis of guidance towards placemaking¹ and away from a system focused upon accommodating the movement of motor vehicles. DS was created to support the Scottish Government's placemaking agenda and sit alongside the 2001 policy document [Designing Places](#) (DP) which sets out government aspirations for design and the role of the planning system in delivering these.

DS emphasises well-designed and well-connected streets as crucial components in sustainable placemaking. This has an important role not only in the immediate quality of the public spaces that we use everyday but also in reducing carbon emissions to tackle climate change and in improving people's health in Scotland. Well-designed streets are a vital resource in social, cultural and economic terms, within Scotland's urban and rural settlements

2. BACKGROUND

The policies within DS moved away from a prescriptive standards-based approach, to one where designers and local authorities should collaborate to unlock the full potential of streets to become vibrant, safe and attractive places.

The premise upon which the document is based is that good street design should derive from an intelligent response to location, rather than rigidly applied standards, regardless of context. This demands taking into account site-specific requirements and involves early engagement with all relevant parties.

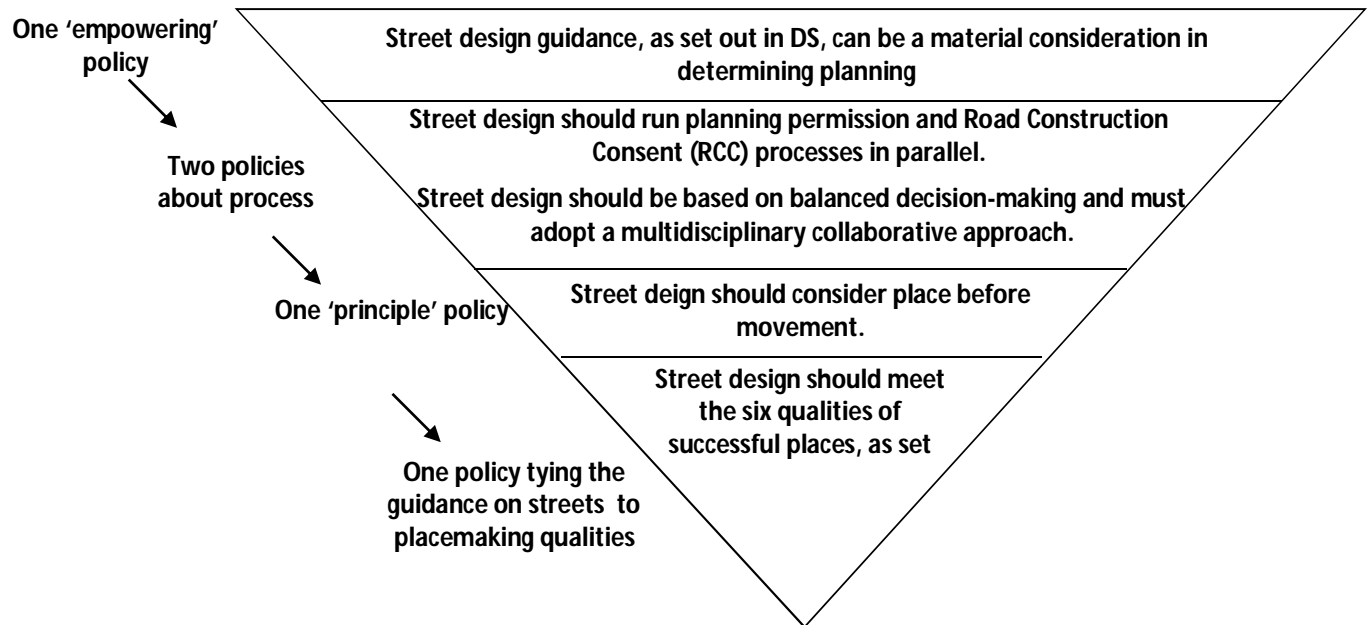
DS contains five policies:

- Street design guidance, as set out [in DS] can be a material consideration in determining planning applications and appeals
- Street design should run planning permission and Road Construction Consent (RCC) processes in parallel
- Street design should be based on balanced decision-making and must adopt a multi-disciplinary collaborative approach
- Street design must consider place before movement
- Street design should meet the six qualities of successful places, as set out in DP.

The above five policies:

- empower local authorities to use street design in making decisions
- align both process and culture to support the creation of good streets
- state a fundamental principle of place before movement, then point towards the guidance within DS.

Figure 1: the 5 policies in **Designing Streets**, presented as a hierarchy:



The bulk of the content of DS is structured around 18 key considerations that sit beneath the six qualities of successful places, clearly connecting the document to DP. Each consideration is allocated an illustrated section of design guidance within the document. Therefore, with some understanding of the hierarchy of policies and principles, DS provides a degree of practical guidance for applicants and officers by linking detailed considerations to the overall aim to produce better places.

3. CURRENT STATUS

DS has been broadly welcomed by many stakeholders in both the public and private sectors. However, there's a perception that a number of local authorities (LAs) have not followed the policy recommendations and continue to use an outdated standards-based approach. There have also been observations that a number of developers continue to propose masterplans that do not comply with the six qualities. As a result there have been fewer than expected examples of masterplans, either produced or delivered, that clearly match the qualitative aspirations of the policy. One of the main intentions of the policy was to streamline the approvals process for masterplans that include buildings and new streets, but obtaining RCC is still causing unnecessary delays and it is not clear how widely RCC and planning are being run in parallel.

This research project, to examine how all the five policies within DS are being implemented, by gathering wide views and opinions from stakeholders, was put out to open tender by Scottish Government Planning and Architecture Division in October 2012. A contractor was sought to take forward evidence gathering by contacting all local authorities, summarise and evaluate findings, and carry out graphic-based case study analysis. Because of the wide skill-

set needed it was expected that the team would include a professional planner, urban designer, architect, engineer or graphic design professional (or more than one of these) together with professionals with skills in market research. Collaborations between different organisations or individuals were welcomed. Around ten submissions were received with the winner of an assessment process being a team led by Anderson Bell Christie Architects.

4. RESEARCH AIMS

The aim of this research was three-fold:

- To undertake a healthcheck to research the status quo and evaluate the current picture of how DS application across all Scotland's local authorities
- Undertake an illustrated analysis against the six qualities of successful places using project case studies.
- Identify what could be hindering successful implementation of DS and identify ways to get policy implemented more effectively.

5. METHODOLOGY

The methodology agreed between Scottish Government and Anderson Bell Christie followed the steps below.

5.1 Desk-based investigation: to detail what baseline information for applicants is published by Scotland's 32 local authorities relating to street or roads design within:

- Local Development Plans (LDP)
- Supplementary Planning Guidance (SPG)
- Other design guidance relevant to streets in urban and rural areas.

5.2 Online survey questionnaires and stakeholder interviews: to find out local authority and developer experience in practically dealing with DS and how the process of parallel RCC and planning is working. It collected information on approaches to implementation by planning, roads design and works departments by asking for experiences and opinions, structured around three main themes:

- Guidance, both published and in progress
- Process, looking for alignment of RCC/planning and evidence of balanced decision-making
- Practice, asking about good practice and barriers to implementing DS in applications, seeking case studies

The local authority officers' questionnaire was adapted for developers and their consultants to gain their views and experience of working with DS, as applied by the local authorities and as implemented on real applications. Selected questionnaire respondents were followed-up with interviews, either in person or over the phone.

5.3 Case Study Analysis: By way of questions within the survey examples of good practice in masterplanned projects (at any scale i.e. from 5 houses up to 800) were sought from either public or private sector stakeholders. A shortlist was created then reduced to around eight to be assessed in detail against all 5 DS policies and the six qualities of successful places. Factsheets to illustrate the masterplan and indicate the degree to which the masterplan is DS compatible are being produced using the B-Plan technique (that is within DS) to highlight aspects of masterplanning and design to enable comparison across projects.

5.4 Evaluation and Conclusion: Summarise the findings from the desk-top study, questionnaires and interviews and look for common threads on problems with guidance, process or the practice around implanting the policy. Conclude by drawing out broad recommendations that could result in any or all of the 5 DS policies being applied more effectively, including the ‘process’ policy of RCC and planning in parallel.

6. DESK-TOP EXERCISE ON LOCAL AUTHORITY GUIDANCE

To follow is a distillation of observations following an initial web-based trawl then phone around of LAs to see what street design guidance is available.*[add illustrations of good practice]*

6.1 Difficult to locate relevant Local Authority Policy and Guidance:

- Websites can be confusing
- Sometimes it is not possible to determine which guidance refers to DS Policy without examining all potentially relevant documents, which is time consuming.
- Telephone advice on what information is relevant does not, in some cases, reflect the guidance available
- Guidance may be under development but not yet published

6.2 Local Authority guidance is not always comprehensive or clear:

- **Supplementary Design Guidance can often be generic** – repeating the content of the DS document rather than illustrating locally derived solutions.
- **Often Guidance has not been developed collaboratively by Roads and Planning Departments**, with the consequent need to refer to separate guidelines. Guidance can still refer to pre-DS roads guidelines which conflict with DS Policy
- **Often, there is a need to refer to more than one Planning Guidance document** to gain an overview of what is required. For example, some Local Authorities provide a number of overlapping guidance documents such as ‘Supplementary Planning Guidance for Residential Design’, ‘Supplementary Planning Guidance for Urban Design’, and ‘Supplementary Planning Guidance for Open Spaces’
- **There can be a lack of guidance on the important qualities of specific locations (a sense of place)** Some Local Authorities provide details of the analysis required by designers to develop an understanding of place-specific qualities. In some cases extremely detailed information was available in the form of development frameworks, briefs and master plans. However, many Local Authorities do not provide any guidance at these scales.
- **Information about servicing and utilities is important but is often overlooked.** Only three local authorities included information about cleansing department requirements. Very few local authorities included information about utilities requirements, street lighting etc.
- **Explanation of collaborative working processes.** Many guidance documents emphasised the importance of Design Statements as an important tool during the Design Development Process, but did not provide details of the Quality Audit Process or parallel Planning Consents and RCC.

7. QUESTIONNAIRE RESPONSES

This section contains summary of the main findings from the survey. The questions were structured into categories of guidance, process and practice as well as some open questions that asked for comments or observations on how the policy is being applied as well as suggestions for activities that would help policy implementation.

7.1 Local Authority Questionnaires

Twenty-five responses were received from 21 local authorities in Scotland representing 66% response rate from authorities

7.1.1. Local authority responses: Guidance

- Many officers currently use DS but still refer to roads development guidance for construction make-up, drainage etc.
- Roads+transport often see DS as planning guidance and not that relevant to work, especially those in maintenance.
- DS is not sufficiently detailed to be able to assess apps against.
- Design Manual for Roads and Bridges (DMRB) is at one end of the scale/ DS is at the other; a middle ground is missing.
- There are huge gaps between streets in urban situations and the application in very rural areas.
- A Society of Chief Officers of Transportation in Scotland (SCOTS) group is working on guidance to compliment DS but it is not yet produced.
- But the SCOTS work indicates there's still a lack of coming together of professions.
- There is concern about SCOTS national design standards may allow a reversion back to prescriptive, inflexible approach.
- A 'car culture' can still predominate, not only in wider society but also in the decisions of officers.
- Greater understanding of statutory nature in relation to the Development Plan is needed.

7.1.2. Local authority responses: Process

- Experience says developers often do not have the level of technical detail required for RCC prepared at planning because of a reluctance to commit technical resources therefore no strong desire is detected on the part of developers to run processes concurrently.
- A proposed solution is a 2-stage process suited to developers' needs where consistency of Roads & Transport advice from Planning stage to RCC will: assure developers that details of layout granted at planning are capable of securing RCC; and assure Roads Engineers from planning permission onwards there'll be no impediment on matters of layout to granting RCC in due course.
- If approved planning layout has been accepted by Roads & Transportation, consideration of subsequent RCC application is straightforward & generally limited to details.
- If developers put thought and preparation into scheme design to make it clearly compliant with policies/ ethos of DS, they have an easy track through RCC process as most RCC issues considered at outset.
- [We] try and fast track all compliant applications; however, compliance with DS is only one consideration within an application and may be outweighed by other issues to take into account, e.g. prioritising economic benefits; but DS compliance helps speed up process.

7.1.3. Local authority responses: Practice

- Local authority feedback says 96% of developers/ applicants do not demonstrate full understanding of DS in their applications.

- Main issue is training of development industry, particularly, volume house-builders.
- Developers demonstrate a lack of understanding and lack of willingness.
- Developers seek front driveways & are not convinced about bringing houses closer.
- The influence of sales+ marketing in the main commercial housebuilding model leads to the traditional model as default position.
- Cherry-picking of elements DS goes on; for example simply replacing standard footpaths on sides of roads within shared surfaces is not DS, even though it may be thought of as such.
- 52% experienced conflict between DS and design, adoption and maintenance requirements of statutory authorities.
- With regards the design/ maintenance of SUDS infrastructure there is a disconnect between council aspirations and the standards of Scottish Water (SW). For example a council was presented with SUDS proposals involving a large basin capable of detaining 1:200/yr. event on site, rather than integrating SUDS elements to gardens/streets/landscaping design. Standards set out by SW in Sewers for Scotland 2 are very difficult for developers to achieve, resulting in engineers designing SUDS infrastructure for adoption by private factors, then leading to problems about design quality/ maintenance. Developers, planning and roads appear to embrace change, but SW are yet to catch up with placemaking agenda in adoption standards.
- SW refuse to adopt anything that isn't within guidelines.
- A council points out that its own waste services seek accessibility for 12m lorries, however the turning space required creates problems in achieving safe shared spaces.
- Roads maintenance teams are reluctant to shift from traditional designs/ materials, on cost grounds.
- Concern about DDA compliance/ future maintenance liability of more expensive streets.
- Safety audits are a barrier as they don't take account of 'relaxations' detailed in DS.

7.1.4. Local authority responses: Other suggestions

- Others indirectly involved in planning process may benefit from broader training.
- More case studies showing good practice examples would be useful for case officers within roads and planning. Case studies should also explain the processes.
- Workshops/ seminars with various parties/ agents with interest in DS implementation.
- Additional supplementary guidance such as adding a rural addendum?
- DS could set out regulations for process/ submission to aid assessment of proposals.
- Community involvement is essential. Many end-users don't understand why there's no footway and perceive this as unsafe for kids. So education for end user is needed.
- DS research to investigate further and explore making existing streets and spaces compliant.

7.2 Developer Questionnaires

25 responses were received from a range of house builders, developers, consultants, property management companies, charities and one registered social landlord (RSL).

7.2.1. Developers/ consultant responses: Guidance

- More than half of developers (56%) felt that LA and roads guidance documents 'rarely' complied with the principles of DS.
- LAs want their own twist on DS. This results in developers who work across many LA boundaries needing to handle inconsistent guidance from LAs. For example a

developer who worked with five LAs reports guidance varying in each case with some embracing DS more than others. A consistent approach across LAs would aid certainty in land bids.

- One developer uses their own Design Standards for Excellence manual, to promote good design, centred around DS principles. They hold group-wide Design Forums to share best practice.
- A view exists that the DS document is open to inconsistency because it lacks specifics. It's not prescriptive enough/ too woolly resulting in a lack of clear government guidance. An areas perceived as less well covered is rural village edges.
- [One developer] doesn't agree every site is suited to the aims of DS guidance. The 'product placement' of a new house for sale on a site can be compromised by DS. But some developers state commitment to DS as part of their branding + legacy.
- DS challenges master-planning's established order, in particular roads design, to not only make suitable and sufficient provision for pedestrians (which it had been doing) but to restrict free access of and movement by vehicles in residential areas. Connectivity can mean more than one vehicular access to aid permeability and connections to wider networks, however this can conversely lead to more short car journeys being made.

7.2.2. Developers/ consultant responses: Process

- Some LAs have a collective approach to planning+roads, embracing change and encouraging DS implementation. However there's still LAs where roads department get involved in discussions only after formal consultation requests from planning colleagues. Experience from working with the majority of LAs is that roads comments still come late in process and change agreed layouts. Too often DS principles are accepted but then diluted when RCC procedure is gone through (echoing responses in the practice section below).
- The survey results on the possibility of RCC and Planning in parallel are: 48% said it's 'very possible' if all parties agree; 48% say it's 'unlikely'. One respondent says it's not possible. Survey results also say 92% of respondents would endorse a streamlining of consents and 83% would view the fast-tracking as an incentive but there is uncertainty about how would work.
- But concerns exist if developers are forced to bring forward RCC applications at the same time as Planning due to readiness (there needs to be flexibility around timings); and the front-loading of detail [if RCC and Planning are tied] could mean increased developer working at risk.

7.2.3 Developers/ consultant responses: Practice

- 83% said they generally develop masterplans to be fully compliant with DS and 58% said LA planners and roads engineers generally assess proposals without full DS understanding. This deficiency by LA officers is expressed by a respondent [an architect's firm] who often finds themselves in the position of explaining DS to LAs. But an alternative view is that there's a shortage of practices (architects and other consultants) who, at present, fully understand DS & this will take time to resolve.
- A good example of productive relationship between developers, consultants and LA planning/ transport teams involved a workshop where quality audit, stage 1 & 2 safety audits for main access + 'principal' streets were completed in a day. RCC was later received. Another developer says planning + developers can reach agreement and deliver good places when allowed to work together.

- Developers still experience conflict between planners and roads officers when trying to integrate DS guidance. Planners tend to support but some roads departments still reluctant to embrace the guidance. One developer reports that roads officers concerns on driver visibility means DS designs are always diluted, echoed by the view that LA roads officers often over-rule proposals resulting in a conventional solution to look like standard estates/ schemes of the past generation. Reasons cited are primarily to do with adoption and perceived higher future maintenance costs by LA roads. One respondent goes further saying resistance from roads departments can be deliberately obstructive.
- A further barrier to implementation is that even if planners and roads engineers agree on layout the Networks Operations Team within LAs can refuse to adopt proposals.
- It's widely held that issues of adoption and/or maintenance are key in steering designs away from DS principles. This is reported in various ways such as:
 - it's mainly LA roads officers and utilities that clash, often over SW adoption requirements.
 - conflicts exist in what's allowed/ prohibited re: permeable paving, trees and parallel parking.
 - DS places buildings closer to street making the two levels of treatment that SW need harder to achieve.
 - Adoption of remote paths is problematic.
 - Safety issues raised by roads officers related to DS layouts.
- Developers are usually not willing [or perhaps, not well-placed because their expertise is construction] to accept maintenance responsibilities for the layout and materials.
- A developer reports that they can end up in a mediation role between conflicting agendas of planners and road engineers in the same LA, resulting in delayed approvals, abortive designs and costs.
- Some developers report resistance to changing to more DS design-led proposals due to them not wanting to invest more expense in consultant's time.
- The understanding of what DS is trying to achieve matters for end-users. Resident reactions and management of social rented stock is challenging where DS has been applied (according to RSL). A private sector respondent reports house-buyers don't like many DS principles and cul-de-sacs remain popular because they're considered safe (cul-de-sacs with pedestrian linkages is a compromise). This view, reflective of sales+marketing as the driver to design, is summed up by the comment: applying DS can clash with product placement.

7.2.4 Developers/ consultant responses: Other suggestions

- Key to DS implementation is to ensure policy is adopted and applied with consistency.
- Views on changing guidance vary widely:
 - more prescriptive/ specific with clearer guidelines; or
 - show a wide range of examples/ approaches; or
 - don't produce more guidance because all involved need to accept the design process is complex and one-size-fits-all is not appropriate.
- Government should aim to:
 - clarify what's policy & what's guidelines,
 - re-write policy using Case Studies,
 - raise best-practice awareness via site visits especially for roads departments,
 - encourage regular multi-sector interdisciplinary exchange.
- Ongoing monitoring of LA performance [built-outcomes or in processes?]

- Ongoing education and buy-in of roads departments. Raise DS profile with roads officers so they engage with design process early in the process.
- Establish DS ‘champions’ to arbitrate between placemaking and technical concerns.
- Consider statutory timetables and rights of appeal for RCC and roads adoption. If RCC is granted then adoption should be matter of course, not subject to further design change.
- ‘Deemed refusal’ for RCC and ‘Deemed to satisfy’ for planning apps and RCCs [further investigation required on the technicalities of these ideas]
- Undertake Post Occupancy Evaluation (POE) in places where DS has clearly been applied by undertaking residents’ surveys.

8. INTERVIEW RESPONSES

Interviews were carried out with two local authorities and two consultants active and experienced at masterplanning; who work with many developers in several local authorities. More interviews are being carried out so this section could be supplemented.

8.1. Interview responses: Guidance

- Local Authorities are working towards synthesised suites of guidance which cover all aspects of street design and which relate streets to place.
- It takes time to develop guidance involving iterative collaborative working between different council departments (eg. planning and roads.) Political support, and decision-making at a high level, has assisted in progressing. Because it has taken some time to develop a shared approach, it has been more difficult for developers to determine what LAs do require. Nevertheless, it is viewed that this is not a process that could be shortened, because of the need to work across departments to resolve potential problems.
- Development Control needs clear Guidance and Policy to assist them to assess applications. Robust Supplementary Planning Guidance is particularly important at appeal stage in order to provide a clear definition of good street design. Training would also assist – informed, knowledgeable staff are essential.

8.2 Interview responses: Process

- There are concerns about the timing of RCC in relation to planning consents and consequent changes to designs and specifications. (e.g. materials used in road surfaces).
- There is concern about the definition of a “Designing Streets Compliant Roads Layout”. This can differ between LAs and developers.

8.3 Interview responses: Practice

- Some developers believed that planning departments do not have sufficient design experience and consider DS Policy overly simplistically.
- Some planners advise that developers do not use the design-led process identified in DS and prefer to use standard house types and layouts where possible.
- Some designers advise that they would pursue high quality street design regardless of policy, and that Supplementary Planning Guidance is not important to them.
- Consideration needs to be given to the Appeals process, which can result in very standard roads layouts gaining consents. Training for Reporters could be helpful.
- **Specific Issues** which have arisen include:

- SW coordination of SUDS with LAs (Section 7 Agreements)
- Locating utilities
- Designing to accommodate waste or cleansing vehicles
- Developers have been offered the choice of old roads guidelines and newer DS policy as a means to assess proposals.
- Case studies are seen as very useful to designers

9. CASE STUDY ANALYSIS

A list of around 13-15 masterplans from around Scotland were identified for case studies. This was whittled down to around 8 to be included in the final report. At present these are undergoing detailed analysis that will be illustrated by use of the B-Plan technique. The process of analysis against key considerations links each masterplan clearly to the six qualities of successful placemaking plus the other policies, as far as possible.

Visuals from this analysis can be included at the time of STAR presentation.

10. EVALUATION AND CONCLUSION

From the observations on the available LA guidance, combined with the distillation of results from questionnaires and interviews, a wide range of barriers to implementation are apparent. When these are considered alongside many of the suggestions that have been made that could better implement DS, a number of recommendations begin to emerge.

The evaluation of what actions to take forward to improve the implementation of DS across Scotland can be broadly split into the following categories:

Guidance

Liaison is ongoing with SCOTS to ensure the compatibility of roads guidance with DS. Communication with LAs, in particular those that this research has identified as having either hard-to-access or out-of-date guidance is being considered.

Process

Simplifying the complex relationships, and degree of repetition, between the audits and assessments related to street proposals is a goal for many respondents. This ties in with DS policies of collaborative working and running RCC and planning in parallel. So this area of action should form a strong basis for recommendations.

Practice

Conflicts around the issue of drainage, utilities and water management emerge as a key driver affecting proposals so more work should be done on integrating this technical area of design with placemaking. Other specialist areas that can disproportionately impact upon the overall design outcome, often negatively, include operational & maintenance issues and accommodating waste collection vehicles. Recommendations will pick up on actions to address these.

The suggestions for more examples of good practice case studies that emerge from the survey responses is being addressed in the published output of this research. The case studies are currently being analysed so that they will clearly illustrate each masterplan's degree of compliance with DS policies, plus include visual assessment against the six qualities of

successful places. Making a process available that can consistently demonstrate how, during pre-application discussions, public and private sectors can collaborate to improve the standards of street design, is already underway. Further consideration will be given to the level of detail and quality of information that should be made available to allow a sufficient assessment to take place and this could link with the content of design statements.

Training and Education

There is some consensus that multi-disciplinary workshop-type events will likely be the best form of further training related to applying DS. The case study analysis offers a model that could be at the heart of hands-on training and offer a chance to re-affirm the statutory status of DS.

A single point of contact within each local authority could champion both the communication and the practice associated with DS.

Overall

At the time of submitting this paper (14th March 2013) Scottish Government is considering between six and 10 areas of action, based around the matters above, to co-ordinate and take forward. These will impact upon planners, engineers and other officials within LAs, utility companies, developers and consultants. Following some more careful consideration, the pointers in the evaluation and conclusion above will form a list of firm recommendations.

11. BIBLIOGRAPHY

Action Research on Road Construction Consent, (2005), Scottish Executive (with WSP in association with EDAW, Muir Smith Evans, Phil Jones Associates and Shepherd & Wedderburn).

Designing Places, (2001), Scottish Executive.

Designing Streets, (2010), Scottish Government (with multi-disciplinary team led by WSP).

Notes

¹ Good or positive placemaking:

- is an inherently collaborative process of ‘renewal and/or creation’; and
- involves design + imagination; and,
- results in places where people to want to live in, work in or visit which exhibit qualities of place.

Scottish Government’s Designing Places and Designing Streets summarise these aspects of places into six qualities to aspire towards:

1. Distinctive
2. Safe and Pleasant
3. Easy to Move Around
4. Welcoming
5. Adaptable
6. Resource Efficient