

## PE1595/III

East Dunbartonshire Council Letter of 16 February 2016

Dear Ms Fergusson

### **Re: Consideration of Petition PE1595 (Moratorium on Shared Space Schemes)**

On the 27<sup>th</sup> of January 2016 East Dunbartonshire Council was contacted by Scottish Government Public Petitions Committee who had earlier heard petition PE1595 *“Calling on the Scottish Parliament to urge the Scottish Government to place a moratorium on all shared space schemes until safety and equality concerns have been addressed.”*

The Council submits two responses to this petition, one detailing the specifics of the Kirkintilloch Town Centre Masterplan and Cowgate Street Design Project and this response which details the Council’s general policy on design.

The Council uses the following Scottish Government documents to inform its policy development and considers that it has followed this policy in its own policy and projects:

- Scottish Planning Policy (2014) – includes a section on Placemaking and states that ‘Planning’s purpose is to create better places. Placemaking is a creative, collaborative process that includes design, development, renewal or regeneration of our urban or rural built environments’. It also states that ‘The design-led approach should be applied at all levels - at the national level in the NPF, at the regional level in strategic development plans, at the local level in local development plans and at site and individual building level within master plans that respond to how people use public spaces’. It sets out the six qualities of successful places which includes easy to move around and beyond – this notes that people should be prioritised before motor vehicles. It also notes that a design-led approach should include ‘using processes that harness and utilise the knowledge of communities and encourage active participation to deliver places with local integrity and relevance’.
- Designing Streets (2010) – This document sets out a policy statement for street design in Scotland which requires a design led approach. It sets out a policy that ‘street design must consider place before movement’ and therefore requires a shift away from prioritising vehicle movement. It requires pedestrians to be considered first, that street design should be inclusive and that vehicle speeds should be reduced through influencing driver behaviour through design. It details the different types of surface level crossings that can be used. It details street surface design and considerations to ensure streets are inclusive. It should also be noted that the policy is underpinned by extensive research and technical detail.
- Creating Places – A Policy Statement on Architecture and Place for Scotland (2013) – sets out the Government’s position on architecture and place. It highlights that quality places are often central to community life and that town centres are important hubs of activity for communities. It also notes the need to encourage people to walk.
- Planning Advice Note 59: Improving Town Centres (1999) – Refers to the needs to provide greater space for pedestrians and the importance of public realm of meeting places and social spaces. It notes the need to make centres more accessible and

reduce vehicle/pedestrian conflict by giving priority to pedestrians, cyclists and public transport, implementing traffic calming measures and good pavement design and surfacing materials, the provision of dropped kerbs and other pedestrian priority measures. It also notes that it is essential that special interest groups are involved in the consideration of what is required.

- Planning Advice Note 77: Designing Safer Places (2006) – States that ‘Slowing traffic down can contribute to a safe and attractive environment. Speed reducing measures should be incorporated into the design of any new development, rather than the reactive provision of traffic calming measures such as road humps and chicanes’.
- Planning Advice Note 78: Inclusive Design (2006) – This Planning Advice Note details how to improve the design of places so that they can be used by everyone, describes the legislative context and roles of different stakeholders.
- Planning Advice Note 83: Masterplanning (2008) – This document explains how to use masterplanning to create better places and how to achieve more effective masterplans. It notes various factors that masterplans should consider including vehicular movement, traffic measures, areas of vehicular/pedestrian conflict, desire lines, disabled access and barriers to easy access, as well as the process of producing a Masterplan including community engagement.

The Council also considers a range of documents produced by other organisations that the Scottish Government and other public bodies recommend as good practise documents.

The Council has therefore set out its own policy on design in the following documents:

- Local Plan 2<sup>1</sup> (2011) – Local Plan 2 is the Council’s adopted development plan and sets out policy regarding new development in East Dunbartonshire. With regards to town centres Local Plan 2 requires improvements to Kirkintilloch and Cowgate through a masterplanned approach, and states that proposals should encourage access by walking, cycling and public transport. It includes a section on design quality and Policy DQ2 states that ‘developments should be designed having regard to the varying needs of all groups in society and should afford ease of movement and access for all’. Its transport policy section also requires accessibility by walking, cycling and public transport.
- Urban Design Guidance Note<sup>2</sup> (2011) – This Guidance Note accompanies Local Plan 2 and in particular this states that pedestrians and cyclists should be prioritised over the car.
- Kirkintilloch Town Centre Masterplan Guidance Note (2013)<sup>3</sup> – This Guidance Note accompanies Local Plan 2 and outlines a number of proposals within the town centre to address issues that emerged from consultation with the public and various stakeholder groups. The projects were then grouped into themes: Public Realm, Gateways and Access, Historic and Built Fabric, Long-Term Physical Change and Economic Development. One such project is the Cowgate Street Design Project, which at that point sought to implement a ‘Shared Space’ approach to street design in Kirkintilloch town centre. This project has subsequently been designed following significant public and stakeholder engagement.

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<sup>1</sup> <http://www.eastdunbarton.gov.uk/residents/planning/planning-policy/adopted-local-plan-2>

<sup>2</sup> <http://www.eastdunbarton.gov.uk/residents/planning/planning-policy/adopted-local-plan-2>

<sup>3</sup> <http://www.eastdunbarton.gov.uk/residents/town-centres/kirkintilloch-town-centre-masterplan>

- Designing Streets (2010)<sup>4</sup> – Following the publication of Design Streets the Council adopted it as policy.
- Proposed Local Development Plan (2015)<sup>5</sup> – The emerging Local Development Plan will replace Local Plan 2 once adopted. The Proposed Plan was published in 2015 and includes Policy 2 Design and Placemaking as a principal policy in order to emphasise the importance of design. It refers to Scottish Government documents Designing Streets and Creating Places. It requires that all development must accord with a range of design and placemaking principles including: E. Help to reduce use of the car by prioritising pedestrians and cyclists; G. Contribute to a welcoming and safe environment; and H. Promote healthy, active and inclusive lifestyles. Policy 4 Sustainable Transport is also a principal policy and requires the prioritisation of pedestrians.

In addition to taking into account national policy in producing its policy documents, the Council also carries out an Equalities Impact Assessment on each document and carries out extensive consultation work including informing a range of community and equality groups about the consultation.

The Council's policy is used to develop public realm and street design projects and planning applications are assessed in accordance with this guidance. The Council has considered a full range of projects and applications since Designing Streets was adopted. This includes a range of residential schemes and the Cowgate Street Design Project. All applications and projects are decided on their own merit and through assessment of the context of the site – the Council does not have a 'one size fits all' approach to design. Following consultation on the policy itself, further consultation is carried out on projects and planning applications with the public, Council and external consultees.

A moratorium would raise a number of issues:

- How would it be enforced?
- From what date would the moratorium take effect? Many planning applications and projects will have been approved throughout the country for development. A request to pause these developments would have a significant impact on the development industry.
- How would Councils make decisions under a moratorium – what changes a shared space street from any other street?
- How would the Government and Council proceed with improving street design for the benefits of all the community?

We would therefore recommend that any potential moratorium or change to the current policy approach by the Scottish Government would require a significant piece of work to review current policy and carry out research on the benefits and dis-benefits of Designing Streets based schemes versus non-Designing Streets schemes and significant engagement across the range of stakeholders involved with street design.

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<sup>4</sup> <http://www.gov.scot/Resource/Doc/307126/0096540.pdf>

<sup>5</sup> <http://www.eastdunbarton.gov.uk/residents/planning/planning-policy/emerging-local-development-plan/proposed-local-development-plan-0>

Should you require any further information please do not hesitate to contact me.

Yours sincerely,

Alison Laurence  
Team Leader – Land Planning Policy