

Consultation Questions - Guidance on Inclusive Design for Town Centres and Busy Streets

Question 1

Please give us any comments relating to Principle 1 and what it is trying to achieve (300 word limit).

We welcome increased design guidance on this matter. It is important to have a consistent approach across Scotland in order to ensure consistency for road/pavement users. Glasgow City Council and our Design Service division fully recognise the requirement to consult with all stakeholders including communities and groups who have specialist requirements. We appreciate that the involvement of key stakeholders is critical both to inform the work being undertaken and to achieve buy-in from people, businesses and organisations that will use the improved junctions as part of their day-to-day business in the future.

We ensure this core principle is embedded into our practices. We design and deliver high quality useable infrastructure and understand not only the need for engagement but also the benefits of engagement. As such, we have developed a keen understanding of when to engage, who to engage with and how to reach each specific audience. It is also important to recognise that at Glasgow City Council, Equality Impact Assessments are conducted for all projects that identify potential impacts and mitigations for those with protected characteristics.

Despite our support for the requirement to engage, have concerns with how the guidance was developed. To date, we are unaware of any local authority roads representatives which were part of the development process. The guidance as it stands does not reflect the issues which might have been raised and discussed by these major stakeholders. We therefore suggest the development of the guidance be re-visited by a balanced panel which includes the roads practitioners experience and views.

In addition to the above, we would like to ask that the Scottish Government's Planning and Regeneration Directorate are consulted. Essentially, we would like to ensure a level of consistency across different planning and guidance documents which we are required to adhere to.

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Question 2

Please give us any comments relating to Principle 2 and what it is trying to achieve (300 word limit).

Glasgow City Council agree with the premise of Principle 2, that early and ongoing engagement is critical to the success of a project. Consultation is an essential element in the development of any future design. Consultation ensures that the knowledge, ideas and experiences of people that live and work in a town, city, or region are the basis for the development and design that will meet future needs. We completely agree that consultation and engagement need to be inclusive and where appropriate, used as a tool to assist in the resolution of tensions between different interest groups by including all views at an early stage.

Glasgow City Council views consultation as a key requirement of the development process and as such we ensure appropriate levels of engagement are built into all stages of a project life cycle. This allows the two-way flow of information between client/authors/designers and stakeholders at key stages of the project. Such an approach provides a much greater understanding of issues, promotes cross party 'joined up' working and importantly allows transparency throughout the project.

We do however note that time constraints within external funding packages can make this challenging, this issue is becoming more critical as various Active Travel funding packages for example move to an annual commitment rather than multi-year projects.

Question 3

Please give us any comments relating to Principle 3 and what it is trying to achieve (300 word limit).

Glasgow City Council are in agreement with Principle 3 – All engagement and materials and language used should be accessible to the audience. This is standard working practice across the Council. GCC have a specific set of procedures to ensure the information we prepare and present is clear and easy for everyone to understand. We have a set of standards which are in place to help make material accessible to people with impaired vision, motor difficulties, cognitive impairment, deafness or with hearing impairments.

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It is also important to note that legislation which came into force in 2020 means all downloadable documents and forms published on public sector websites and intranets must be accessible - this includes pdfs, forms, word documents and webpages.

The regulations note: "Accessibility means more than putting things online. It means making content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things."

We apply these standards to our consultation and engagement materials as a matter of course which ensures maximum accessibility for our target audiences.

Question 4

Please give us any comments relating to Principle 4 and what it is trying to achieve (300 word limit).

Glasgow City Council fully agree with Principle 4 that there is a need to engage with individuals, local communities and groups who use or may use a place. This engagement ensures that the knowledge, ideas and experiences of people that live and work in a town, city, or region are the basis for the and design that will meet future needs. As noted within our response to question 1, this is standard practice for design teams across Glasgow City Council.

While we are fully supportive of the aspirations as set out by Transport Scotland we do have concerns that the level of engagement asked for is unrealistic within the context of local government resources if all project were to be considered, and this level of input should only be applicable to major projects. GCC therefore feel that there needs to be a recognition of limitations and potentially a cut down version of guidance requirements for smaller projects.

Question 5

Please give us any comments relating to Principle 5 and what it is trying to achieve (300 word limit).

To ensure that the consultations we carry out are appropriate, effective and of a high standard we have developed Consultation Guidance which is designed to help those undertaking consultation. The guidance covers all aspects of the consultation

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process from the planning through to the evaluation and provides practical support in areas such as;

- Stakeholders/Target groups
- Methodology
- Timing
- GDPR
- Equalities
- Publication
- Reporting and Feedback

Importantly, we recognise that engagement needs to take place across a variety of mediums for maximum reach and where delivered in person, needs to be held in places that are accessible for the community and at times that will suit people. Glasgow City Council have therefore developed specific guidance which covers approaches for the following methods of engagement:

- Surveys - Face to face, telephone, post, online
- Leaflets and newsletters
- Public Meetings
- Workshops
- Focus Groups

Our guidance has been developed over a number of years and provides staff key information including advantages, disadvantages and specific considerations for each.

Question 6

Please give us any comments relating to Principle 6 and what it is trying to achieve (300 word limit).

While GCC agree in principle with what the guidance is trying to achieve, we firmly believe there is no 'one size fits all' solution.

We do note that TRL guidance (www.trl.co.uk/publications/trl287) evidence's that a 20mm delineation is detectable by visually impaired users. This delineation detail is recommended by Cycling by Design; we therefore can and do use this standard where appropriate.

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GCC suggest that design should be informed by the specific conditions of the area under consideration. This will include level of service, traffic volumes/speeds and place function. We feel that designing to the localised conditions is far more appropriate than one overarching standard.

Question 7

Please give us any comments relating to Principle 7 and what it is trying to achieve (300 word limit).

Glasgow City Council are in full agreement with Principle 7 – pedestrian corridors and footways should be free from obstruction. Whilst we support this principle and work towards it within delivery of our own streetscape designs we would caution against a ‘one size fits all’ approach and note that the optimum design solution may not always be possible. This is particularly true in areas with significant historic built environments. Safety and access specific considerations can and do often come into play and this can often be the case around civic or sensitive sites within major cities where physical interventions may have to be employed for security purposes.

We feel it is important to recognise that building in an existing environment requires compromises to be made. Caveats similar to those included in the tactile design guidance should be included to allow designers to vary from guidance where necessary.

GCC therefore strongly recommend that design judgement and engagement with key users of the space should always help to inform these decisions.

Additionally, GCC would recommend that the guidance should ensure that sufficient weight is given to the multiple benefits that retrofit blue-green infrastructure can provide in urban areas (ie flood risk, air quality, cooling, biodiversity, green network, noise reduction, general health and wellbeing, etc) when applying this principle to ensure that the aspirations of the Scottish Government Water Resilient Place policy framework and corresponding NPF4 policies are appropriately recognised.

Question 8

Please give us any comments relating to Principle 8 and what it is trying to achieve (300 word limit).

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Glasgow City Council do not have anything to add to this section. We agree that safety is paramount. Where possible, GCC Officers will pursue the highest quality of intervention. We recognise that interventions can be influenced by the characteristics of each specific location and while we try to avoid a catch all approach, we do have specific standards which can be replicated across similar areas. Our approach will involve consultation with local communities and those who will use our facilities, it can be important to set out during these sessions, specific design standards and reasons for employing specific interventions at crossings.

Question 9

Please give us any comments relating to Principle 9 and what it is trying to achieve (300 word limit).

Glasgow City Council have nothing further to add here, we agree with the principle as set out and note that this approach is as standard within our designs when selecting materials.

Question 10

Please give us any comments relating to Principle 10 and what it is trying to achieve (300 word limit).

Glasgow City Council recognise the importance of consistency within design standards and implications in projects across our City. We are actively ensuring consistency and standardisation of design standards, details and materials across our recent and current projects. This stretches from design, through to procurement and installation/delivery on the ground.

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