



**TRANSPORT
SCOTLAND**
CÒMHDHAIL ALBA

ANALYSIS OF RESPONSES TO THE
PUBLIC CONSULTATION ON DRAFT
GUIDANCE ON INCLUSIVE DESIGN FOR
TOWN CENTRES AND BUSY STREETS

Contents

Contents	2
1. Introduction	3
2. Headlines.....	6
3. Engagement principles	8
Principle 1. Why and Principle 2. When.....	8
Principle 3. What	9
Principle 4. How	9
Principle 5. Where	10
4. Engagement themes	11
5. Design principles.....	13
Principle 6. Effective Separation Between Different User Zones	13
Principle 7. Clear, Unobstructed Pedestrian Corridors and Footways	14
Principle 8. Crossings	15
Principle 9. Materials	16
Principle 10. Consistency in Design.....	16
6. Design themes	17
7. Broader themes.....	19
Annex 1: Organisations responding to the consultation.....	22

1. Introduction

This report presents an analysis of responses to the public consultation on the Guidance on Inclusive Design for Town Centres and Busy Streets in early 2024. Thank you to everyone who took the time to respond to the consultation.

Background

Draft national guidance for Scotland has been developed to support the design of inclusive town centres and busy streets. It is based on the premise that if the area is designed for disabled people, then the majority will benefit. The guidance was drafted to help structure, plan, and design more inclusive environments.:

[Draft Guidance on Inclusive Design for Town Centres and Busy Streets |](#)
(Transport Scotland website)

The draft guidance was developed in response to research which identified that street design should consider the needs of everyone. The research recommended that the principles which it identified should be embedded in guidance and applied in practice:

[Inclusive Design in Town Centres and Busy Street Areas Transport Scotland WSP Research Report](#) (Transport Scotland website)

For those involved in designing or delivering street improvements or adjustments, the guidance provides information on the engagement process, equality duties and key design features to allow accessibility and navigation of busy streets. It addresses the need for meaningful engagement with local people and a place and person-led approach.

This guidance will be of interest to individuals who use these areas including but not limited to disabled people, disabled people's organisations and community groups involved or interested in street design projects in town centres and busy streets.

The consultation on this guidance was launched on the 11 January 2024 and ran until the 29 March 2024. It asked ten questions, with the first five relating to engagement principles and the second five to design principles. The consultation documents are available on the Scottish Government's website and, where consent has been given to publish the response, it may be found at [Guidance on inclusive design for town centres and busy streets](#).

Profile of responses

A total of 57 responses to the consultation were received. Most of these (55 responses) were submitted either through the Scottish Government's Citizen Space consultation platform or via email to the Transport Scotland policy team and added onto the system. Of these responses, one was blank. A further two responses were submitted in letter form via email directly to the Transport Scotland policy team. Rather than being set out as responses to the ten Principles these provided overall statements on the street design and related matters. The 56 substantive responses were analysed together, and the findings are reported below.

Respondents were asked to identify whether they were responding as an individual or on behalf of a group or organisation. A breakdown of the number of responses received by respondent type is set out below, and a full list of group respondents appended to this report as Annex 1.

Table 1 – Respondents by type

Type of respondent	Number
Professional association	5
Access panel	2
Local Authority	5
Public Body	2
Regional Transport Partnership	2
Voluntary sector or representative organisation	9
Other business or organisation	5
Individual response	27
Total	57

Analysis and reporting

Feedback from the consultation has been analysed by themes which came up across responses to the principles.

As with any public consultation exercise, it should be noted that those responding are self-selecting and in some cases have a particular interest in the subject area. Therefore, the views they express provide important insights but are not intended to be representative of wider public opinion.

2. Headlines

There was broad support for the principles set out in the consultation document among many respondents. There were also a lot of constructive contributions relating to why the principles and guidance are helpful and also how they could be improved. Stakeholders held a range of views related to both engagement and design in town centres and busy streets relating to the quality of the design and also potential cost, enforcement and feasibility issues of implementing high quality engagement and design.

In the consultation responses there were several themes that emerged across principles. For the first five (engagement) principles, a number of responses related to engagement topics that did not precisely align with the principles and have been presented under themes after the principle response summaries. For the last five (design) principles the summary of responses has been split into some themes as well as principle-specific summaries.

Agree and disagree all principles

A number of comments restated what is positive and helpful about the principles. This report focuses mainly on the value added via the additional comments provided. At the same time, it is worthwhile emphasising the level of support for the principles that came in via this consultation. There were a total of ten comments disagreeing with various principles. Among the ten comments that disagreed, reasons for disagreement included the need for emergency vehicle access, which staggered crossings are problematic because there may not be enough space on the island for a wheelchair, and that disabled pedestrians should be able to move around on pavements without worrying about cars, cycles or e-micro-mobility devices.

The remaining comments which were not clearly agreeing or disagreeing made other sorts of contributions of additional considerations for instance or making a wide variety of points. Because of this the numbers of responses in the table below will not add up to a total number of respondents.

Table 2 – Agree and agree with additional comments responses

Principle	Agree	Agree with additional comments	No response given to this particular question
1	10	23	10
2	12	18	11
3	15	13	11
4	8	19	10
5	13	11	11
6	6	17	8
7	10	20	6
8	14	11	9
9	13	10	11
10	11	6	17

3. Engagement principles

Most of the respondents who agreed with the principles made no further comment (see 'agree' Table 2). Others noted that the principles seem appropriate, although they could be improved upon, or that they are not specific enough. In these cases, a number of respondents provided further views on what could be improved. This was especially true for responses relating to the first five principles on engagement, where several responses included thoughts relating to how to carry out engagement.

Principle 1. Why and Principle 2. When

Responses largely supported the idea that engagement is important in order to arrive at good design for town centres and busy streets.

Respondents supported the guidance document on early engagement with the community, one suggesting that residents could have input on the method of engagement as well as engagement continuing throughout the project. Another respondent suggested going further, to have an ongoing or even permanent consultation process. One response indicated support for engagement continuing after the project is completed as this can help pick up any issues.

Separately a respondent noted that there may be time constraints on projects due to how funding is organised, resulting in potential challenge for engagement processes.

Principle 3. What

Regarding the form the engagement takes it was noted that having at least some events in person and some events online at different times of day/of the week would allow for the best level of participation. Publicly available information and means of response that can be looked at and returned to, was considered to be a key form of engagement by one respondent.

Another suggested going door to door with leaflets and seeking opinions in shopping centres, via schools or other locations to reach the local community. One respondent noted that consultation notices should be posted at a height readable for wheelchair users.

Principle 4. How

Training for the engagement team to be aware of different groups of people who may want to engage, and their needs would facilitate engagement according to one participant. Another asked that the designers be fully involved in the consultation process, so that they understand the subtleties of different sets of needs (which may conflict). Also suggested was for materials to be available in Easy Read format in order to make the planning and design processes more accessible.

Some responses suggested that it can be challenging to engage with proposals. One respondent suggested using examples, followed by artists impressions of the environment in question, which need to be suitable for public understanding and reaction. A respondent recommended using the [Place Standard tool](#) in order to effectively engage communities.

Principle 5. Where

Regarding engagement event location a number of respondents felt it is important for this to be accessible (e.g. with Hearing Loops) and have good public transport access. One option suggested by several respondents is to conduct engagement in locations already used by local organisations and groups in the community. When the location is the town centre or busy street where the project is proposed care should be taken, a respondent suggested, to consider different weather conditions and light levels in order to include feedback in the context of a range of conditions for the new design. Another respondent suggested using the format of a walk-through in order to gain views from local people and identify any context-specific challenges.

4. Engagement themes

Respondents brought in topics relating to engagement which were broader points. Many of these had to do with who is engaged with.

Who

Respondents brought up a number of groups who should not be missed in planning and carrying out engagement. One suggested local authority use their database of blue badge holders to contact them. Another noted it was important to accommodate vulnerable people and those with English as a second language. A third said homeless people and young people in care should be included. Another suggestion was to include multiple groups or people with the same disabilities or health conditions, as not everyone with the same disability or health condition will have the same experiences.

One of the issues raised was ‘How do we avoid missing the quiet voices within the community?’ One respondent felt that the proportion of people consulted by local authorities currently was too low, suggesting that 90% of the population should be involved.

Several respondents suggested engagement with organisations that represent people with diverse needs is important. One question posed here was how projects can reach these organisations and suggested a list of contacts would be useful. One respondent offered views on how to weight the input of organisations as against people who live locally, saying that organisational influence should be limited to 30% with the remainder being for those who live locally. Another felt national organisations should not be ignored but their opinion should be given less emphasis. Other views shared related to locals being asked or decisions made by those living locally.

It was also suggested the local Community Council may not be familiar with the legislation and standards referred to in the guidance, requiring support and advice from the local authority, alongside community opinions.

Engagement leading to action

While the principles on engagement were generally received favourably, questions were raised when responding to the engagement principles around what happens after the engagement. One theme was when engagement is done but does not appear to result in changes to the design.

Additional points on engagement:

One respondent suggested building in a budget to allow for remuneration of participants for their time. Another suggestion related to training members of the design team in disability awareness to improve the engagement process.

5. Design principles

There were five design principles in the guidance document. Some of the responses to these related to the specific infrastructure elements that these principles cover.

Principle 6. Effective Separation Between Different User Zones

Some responses stated why they agreed or provided additional supporting information from their experience or their organisation. As well as this some comments made specific points on this design principle.

Regarding kerbs and dropped kerbs, one respondent referenced a 20mm height differential (as seen in Cycling by Design) and referenced in TRL guidance as being detectable by visually impaired users. Another respondent however suggested 60mm was the suitable size for the drop. A third respondent referenced BS8300 (British Standard guidance used by architects) with reference to dropped kerbs, that these should be 0-6mm for wheelchairs to be able to pass, but that these are sometimes up to 20mm in height and there is a need to audit dropped kerbs.

Quote

“The ideal dropped kerb has a gentle slope from pavement to road, with a seamless join and tactile tiles to alert people with visual impairments to its presence... If a car is parked across a dropped kerb, it is rendered useless to wheelchair users.”

Other points concerned space demarcation. One respondent asked for national consistency on colour use to denote zones for pedestrians, cyclists and motor vehicles. Another asked for all new housing developments to have cycle lanes separate from cars and pedestrians. A third suggested floating parking is not good design because pedestrians have to cross the cycle lane to reach their car. A fourth respondent pointed to a section in the text relating to kerbs to define the pedestrian space – asking if this could be clarified that this does not relate to continuous footways? The same respondent expressed concern around the terminology of ‘low flow and low speed’ streets and the importance of the context of the town centre/busy streets guidance.

Principle 7. Clear, Unobstructed Pedestrian Corridors and Footways

Some responses stated why they agreed with the principle. Others provided additional information or suggestions. One respondent expressed concern about existing infrastructure, suggesting that as not all towns and cities have wide pavements in good repair the practicalities of introducing such a corridor becomes difficult. Another questioned how obstructions will be monitored and what penalties, if any, may ensue if the guidance is not adhered to.

One suggestion was to make cycle parking mandatory near water bottle filling stations. Another asked for the provision of facilities for larger cycles including adapted, tandem and cargo cycles to be added at bike storage locations. One respondent shared a concern about dockless e-bike and e-scooter schemes potentially leading to these vehicles being parked or discarded and blocking pavements. A further respondent noted that clear signage is helpful where footways may be shared with cyclists.

Quote

“This is a particularly welcome aspect of the consultation. Despite being at the top of the sustainable travel hierarchy (from NTS 1 and NTS2) ... pedestrian facilities all too often are not truly prioritised in plans and developments, particularly those where aspects are having to be retro-engineered.”

Principle 8. Crossings

Some responses stated why they agreed or provided additional supporting information from their experience or interest group. Others provided additional information or suggestions. One asked for controlled crossings at four way junctions, another that cycles are included in controlled crossings. The need for there to be a path through tactile paving at a crossing for those with feet problems was raised. Another respondent expressed concern about continuous footways as a form of crossing, while one participant was supportive of controlled crossings but suggested there may not always be enough time provided to cross the road.

Additionally, one respondent suggested bollards be placed either side of significant dropped kerb locations to prevent parking across them.

A local authority shared that they had done engagement with mobility stakeholders and people with mobility restrictions, finding a preference for two-staged crossings due to lack of time with a single stage.

Quote

“Members recognise that new crossing display the ‘red/green man’ at a lower level on the same side of the road. While this may be helpful for some crossing users, for those with a cognitive impairment, this may cause confusion since it is not familiar, and they may not look for the signal at a lower level.”

Principle 9. Materials

Some participants provided additional comments from their experience or interest group. In relation to Principle 9, in one case it was requested that cobbled or flat paving tiles are not used, as these can become slippery. Another asked for guidance to support local procurement of materials, including assessing the lifecycle of the materials. A third requested that the work of one utility company is not quickly followed by another.

Principle 10. Consistency in Design

Some responses stated why they agreed or provided additional supporting information from their experience or interest group. Others provided additional information or suggestions.

Better enforcement of Equality Impact Assessments would be helpful according to one participant. Another said consistency in street design is good because it helps people with sight loss to navigate. In contrast, another welcomed a design led approach which leads to context specific projects rather than standardised designs. Regarding gathering data and auditing road safety one response suggested that councils cannot afford to do this.

6. Design themes

As with engagement, some topics came up in the course of the consultation relating more broadly to design. In this part of the report are some issues that emerged from the responses to the five design principles.

Stakeholders were split on the question of having universal design principles as opposed to suiting a design to a location and context (e.g. traffic volumes and place function). Their views also varied in terms of how to weight high quality design principles against the cost of implementing these.

Quote

“Any skilled observer of the public realm will see a significant and obvious design and implementation failures on many streets. Celebrating projects where accessibility is embedded in design and delivered well (as judged by users, especially disabled people) is vital.”

Maintenance

Comments on maintenance were focused on route surfaces, with some respondents also commenting on the need for maintenance of dropped kerbs and controlled crossing infrastructure (such as rotating cones), including how it is funded and delivered.

Relatedly, one respondent noted that it is helpful when local authorities have accessible fault reporting systems.

Also, the choice of materials in this context came up, suggesting that robust materials and their life-cycle are important considerations, as well as protecting pedestrian spaces from heavy vehicles.

On surfaces, several respondents referred to the importance of these being kept in good repair including after utilities works. One gave details of how poorly maintained surfaces can affect wheelchair users, potentially causing pain, injury or simply being unpassable.

Hazards

Paving being slippery (due to fallen leaves) or uneven and poorly maintained was a recurring theme.

Raised kerbs were generally positively received as a way to distinguish between areas for different modes, however it was noted by several respondents that people with dementia may not be as easily able to perceive the kerb if it is not also demarcated in another way e.g. a contrast between the two areas in colour or material or another boundary element such as a single row of paving bricks.

At the same time, the use of dropped kerbs was encouraged at all crossings and also along longer or residential roads for those using wheelchairs or mobility aids.

7. Broader themes

The themes discussed in this section, emerged as cutting across both engagement and design.

Implementation

A number of the responses which expressed support for the principles also brought up questions relating to implementation of these principles in practice.

Some respondents felt it was unclear how and by who the guidance will be used. For instance, one respondent suggested more work is needed to clarify how the principles will work in practice. Some were concerned that the guidance may not be adding anything new.

Quote

“Even where good designs are adopted, the success of the projects will be reliant on tight control by ... project managers ... Too often contractors fail on detailing ... e.g. ... levels of upstands, configuration of tactiles ... poor placement of secondary street furniture etc. This needs to be further explored in the guidance.”

Cost

Some respondents were concerned about the cost of what is being proposed in the guidance. They stated that quality in engagement and design can only happen if properly funded.

For example, one respondent was concerned that constraints on funding could limit implementation of effective community engagement. On the design side one respondent noted that controlled crossings cost money to install and maintain, while another suggested new infrastructure design must include planning for the cost of including controlled crossings.

Enforcement

Several responses expressed concern about how these principles will be enforced in practice. It was suggested by one participant that a lack of enforcement may lead to poor quality infrastructure. Another brought this up in the form of concern about how compliance would be monitored, including what penalties, if any, were to be given, and asked for this to be clarified.

Another response stated that disability legislation is good, but it is the carrying out of the Public Sector Equality Duty where this falls short, e.g. public bodies not doing adequate Equality Impact Assessment (EqIA). There was also a suggestion that there is a need for training on EqIA.

Best practice examples from engagement and design

Some of the responses to the consultation contained advice relating to how the document could be more effective. One response suggested providing real world case studies or hypothetical examples of poor engagement methods that have or can result in poor design outcomes, which would help make the guidance relatable. There was also a suggestion that the document could include examples of what inaccessible material and language look like compared to more accessible material and language. Examples of engagement done well, and successful places created as a result, were asked for.

Similarly to engagement, respondents asked for design best practice examples to be included in guidance alongside real life examples in order to demonstrate for instance how a particular crossing could impact disabled people and show the importance of the right design.

Quote

“Recently completed housing co-design research at the University of Stirling showed that [immersive visualisation] technology can support full and detailed involvement of older people, including those living with dementia, in the environmental design process.”

Other respondents provided examples of case studies they felt illustrated relevant points.

- New cycle paths in Glasgow were the subject of engagement after completion, allowing for the input of visually impaired people and the potential for improvement of the design.
- Engagement in Stirling Council with local people living with dementia, and their carers and families supported and informed the implementation of projects in Stirling city centre, with a focus on what worked well and what was in need of improvement.
- Aberdeen City Council Disability Equity Partnership worked to support informing the design of projects in Aberdeen city centre.

Annex 1: Organisations responding to the consultation

Voluntary sector or representative Organisation

- Health and Social Care Alliance Scotland (the ALLIANCE)
- Environmental Design Special Interest Group of Dementia Alliance International
- Whizz Kidz
- RNIB Scotland
- Paths for All
- Age Scotland
- Scottish Dementia Working Group (SDWG) and National Dementia Carers Action Network (NDCAN)
- Sight Scotland and Sight Scotland Veterans
- National Federation of the Blind of the UK (NFBUK)

Professional association

- Built Environment Forum Scotland (BEFS)
- Royal Town Planning Institute
- Architecture and Design Scotland
- Law Society of Scotland
- Royal Incorporation of Architects in Scotland

Access Panel

- Edinburgh Access Panel
- Stirling Area Access Panel SCIO

Local Authority

- Scottish Borders Council
- City of Edinburgh Council
- Glasgow City Council
- Aberdeenshire Council
- Aberdeen City Council with Aberdeen Disability Equity Partnership, Shop Mobility Aberdeen and North-East Sensory Services

Public Body

- Public Health Scotland
- Mobility and Access Committee for Scotland (MACS)

Regional Transport Partnership

- NEStrans
- TACTRAN

Other business or organisation

- Crail Golfing Society
- Intersectional Stigma of Place-based Ageing project at the University of Stirling
- Dumbarton Stations Improvement Trust
- Common Weal
- Our Connected Neighbourhoods (c/o University of Stirling)



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