

Design Guide for New Residential Areas External Consultation: Summary of Comments Received, Council's Response and Action Taken

Q1. Do you think that the document clearly identifies the new process?

Summary of Comments

Overall, feedback was positive. Most comments concerned lack of clarity in relation to the process stages diagram, stage numbers and the numbering within the body of the text. A stronger link to Designing Streets at the beginning of the document was suggested.

Council's response and action taken

The process stages diagram has been amended to make it clearer, hyper links added and numbering corrected. The statutory consent section has been amended and a clearer link to Designing Streets has been made in the Purpose and Vision section. Stage 2 The Appraisal section has also been amended for greater clarity.

The Guide places emphasis on process in order to assist developers through the stages of development. Street design involves a wide range of contributors and the Guide aims to support collaborative working from the earliest point to deliver Designing Streets' objective of distinctive streets where functionality is accommodated within a positive sense of place. The Council is committed to providing representatives from the disciplines involved from the early stages of the process.

Q2. Do you think that the process follows a logical approach to development?

Summary of Comments

Overall positive responses were received. However, concern was expressed as to whether the Council would be able to handle planning and roads construction consent applications as proposed and meet with developers as intended; regarding lack of reference to scale of development, with the guide appearing to have a one size fits all approach; where the process sits within the pre-application period; the substantial costs, resources and time required from developers but lack of certainty on the principle of development.

Council's response and action taken

The Council acknowledges the Design Guide will require a change of working practice and that this will entail a resource commitment from the Council.

A one size fits all approach is not intended. As with current practice, the amount of detail and the supporting documents required for a development will vary, depending on its size and on the nature of the site. The Guide has been amended to make it clearer that the Council undertakes to provide more detailed pre-application advice if the process stages are followed. In this regard, the Guide also advises that following the initial desk top survey, the developer should contact the Council to agree what surveys will be necessary. Such surveys, e.g. a topographic survey, transport assessment, flood risk assessment, environmental impact assessment are existing requirements depending on the circumstances of the site and development.

Pre-application consultation is required only for major applications (i.e. 50 dwellings or more, or sites of 2 hectares or more). For a major application, a Proposal of Application Notice (PAN) must be submitted at least 12 weeks before the planning application, with community consultation carried out in that period. The pre-application procedures outlined in the Design Guide could overlap with community consultation and a developer could use the appraisal, strategy for the site and conceptual layout as a basis for the community consultation, which could then inform the detailed design.

The Process Stages set out in the Guide advise developers to contact the Council to discuss the general principles of a proposed development before starting an appraisal. Thus, the Council would be able to advise at the outset whether the principle of residential development is acceptable for a site.

To establish the feasibility of a development and what number of units can be achieved will require an appraisal of the site and its context which will inform the design and layout and consequently the number of dwellings. This is current good practice in line with existing Scottish Government policy and guidance e.g. Designing Places, Designing Streets, Green Infrastructure: Design and Placemaking and PAN 44 Fitting New Housing into the Landscape.

The Guide is a design-led approach to be implemented through a consistent pre-application process. When this is followed an application for roads construction consent can be submitted at the same time as a planning application with reduced consideration times for both applications. Developers could apply for planning permission without going through the pre-application process and the application would be determined accordingly but Road Construction Consent would not be considered simultaneously and therefore the applications would not benefit from the reduced timescales offered by the Design Guide's approach.

Q3. Do you think the objectives as shown at the beginning of each stage clearly identify the responsibilities of both the developer and council?

Summary of Comments

Again, overall feedback was positive but comment was made that the Guide appeared to put onus on the developer but did not make clear the Council's responsibilities and obligations. It was noted that Stage 3.3 Housing Typologies and Stage 4 did not have objectives causing lack of clarity.

Council's response and action taken

As noted above, the Design Guide will require a change of working practice. The Council undertakes to provide more detailed pre-application advice as part of the process and to provide resources for pre-application discussions. Accurate records of meetings will be agreed and will accompany the process.

The Housing Typologies section was not intended to be a stage in the process but simply to provide examples of possible layouts that meet the guidance provided. This has been relocated in the Guide and Stage 4 has been given an objective.

Q4. Do you think the information contained within the housing typology is clearly illustrated?

Summary of Comments

There was strong concern that the housing typologies were too prescriptive and parking-led, and excluded alternative housing types and integral garages and included rear lanes, which in some areas are associated with anti-social behaviour. It was commented that the diagrams seem to fall short of the aspiration of the document and did not relate well to the text.

Council's response and action taken

The Housing Typologies section was not intended to be prescriptive but aimed to test the presence of cars within residential development and to provide examples of possible street layouts that meet the guidance provided and existing policy framework. The typologies are not exhaustive but represent housing types most frequently built in Glasgow. Other house types are not excluded.

Integral garages are not ruled out by the Guide and this section has been clarified. The rear lane shown in the terraced housing typology is conceived as a private shared access and not as a through lane. The Council will endeavour to prevent anti-social behaviour issues by promoting passive supervision and lighting (through factoring arrangements).

The Housing Typologies illustrations have been redrawn to improve their appearance and relocated to make it clear they are examples and to avoid them being seen as prescriptive.

The Guide is not parking-led. However, in seeking to promote streets as social spaces for people to enjoy, one of the greatest challenges is how to accommodate parked cars and prevent them from visually dominating the streetscape.

Q5. Do you think that introducing a preliminary and a detailed design audit is beneficial to the overall process?

Summary of Comments

There was general consensus on the benefit of introducing design audits, provided they do not hinder the overall process. Concern was expressed regarding the level of information asked of developers and greater clarity regarding what is required in a design audit submission was requested.

Council's response and action taken

As noted above and in accordance with existing practice, the level of information required for a development will vary, depending on its size and the complexity of the site.

The initial desk top survey does not involve additional work but is current good practice to identify key constraints and opportunities that will influence the design of a development. The Guide then advises developers to contact the Council to agree what additional information will be necessary. Surveys such as a topographic survey, transport assessment, flood risk assessment, are current requirements that should be undertaken early in the design process.

The Guide's requirement for design audits is in accordance with Scottish Government policy. Designing Streets promotes use of design audits, stating they are particularly beneficial at pre-application stage and should be integral to design. They can ensure that street designs are appropriate and meet the objectives agreed at the outset.

The Preliminary Design Audit section has been re-written to explain better what is required and clarify its relationship to the Road Safety Audit process. It now makes clearer reference to the need to include walking, cycling and public transport accessibility in the audit and advises that the amount of detail in an audit will depend on the scale and complexity of a site. Requirements can be discussed with the Council but for simpler sites a preliminary design audit may not be required.

Q6. Do you think that the audits are introduced at the appropriate stage within the overall process?

Summary of Comments

There was overall acknowledgement that audits should be undertaken early in the design process provided there is timely and coordinated feedback from the Council. Positive mention was made of the use of the Bavarian B-Plan tool.

Council's response and action taken

These points are noted. The Council undertakes to provide more detailed pre-application advice as part of the process and to provide resources for timely and coordinated feedback.

Q7. Do you think that Glasgow's design guide for new residential areas allows for the detailed implementation of designing streets principles in relation to place and movement?

Summary of Comments

Overall responses were favourable. Main concerns were that the Guide should not be overly prescriptive and should not stifle innovation and that it reads as standards based. There was concern that place and movement are placed equal and therefore placemaking is not seen as paramount. It was suggested that the Guide would benefit from greater emphasis on the role of green infrastructure in placemaking.

Council's response and action taken

It is agreed that the Design Guide should not be overly prescriptive and so stifle innovation. The Guide's aim is for design and layout to respond to particulars of each site and to discourage the application of standard design solutions. It aims to interpret Designing Streets in a Glasgow context and promotes use of practical measures such as street trees and forward visibility to achieve Designing Streets' objectives.

The Guide has been amended to avoid it appearing overly prescriptive and additional emphasis has been placed on incorporating green infrastructure.

Q8. Do you think that the information provided in the document is laid out in a clear manner?

Summary of Comments

Consultees considered the document generally clear but nevertheless it would benefit from clearer navigation and referencing between the flow chart and stages and there was some confusing numbering. It was commented that the document is overly long and wordy but, additional text was suggested by a number of consultees. It was suggested that more diagrams and explanations for text would be helpful.

Council's response and action taken

Changes have been made to the Guide to bring consistency and clarity and to integrate the information provided including diagrams and illustrations. The document has been edited and a balance struck between providing sufficient information to assist users of the Guide but not so much as to burden them.

Q9. Do you think the illustrations support and complement the advice provided in the text?

Summary of Comments

The general view was that the images could be improved and their connection to the text should be more explicit. There was a request for further examples of acceptable layouts, different housing types and street patterns and a comment that it was not always clear whether images were of good or bad examples.

Council's response and action taken

The Guide aims to show positive examples. To improve the document, photographs have been reviewed and replaced or relocated where appropriate and have been given titles.

Sketches have also been reviewed, relocated and in some instances redrawn. However, examples of all possible layouts may be seen as overly prescriptive and standardised approach and could stifle innovative design solutions to the constraints and opportunities offered by any individual site.

Q10. Do you think that considering the RCC and planning application simultaneously will assist the development process?

Summary of Comments

The general view was this would assist the development process provided decisions are made in a reasonable timescale and much would depend on implementation, staff training and culture change. There is risk that if planning permission and roads construction consent are fully integrated the length of time to obtain planning permission will increase. Developers may not wish to pay for road construction consent before planning permission is granted. The Guide should demonstrate that the investment up-front will be worthwhile from the developers' point of view. Appendices 1 and 2 should be aligned as far as possible. It was added that on-street parking should be discouraged on bus routes

Council's response and action taken

The executive summary has been amended to explain the benefits of the Design Guide process. Planning permission and roads construction consent are different statutory consents but through the Design Guide the Council aims to improve and align the processes for obtaining these consents. It is anticipated that early consideration of all issues relating to a development (planning and roads) may result in fewer planning conditions. The Guide encourages on-street parking in appropriate locations.

Q11. Are there any additional terms mentioned in the design guide whose meaning should also be identified and included in the glossary?

Summary of Comments

A number of suggestions were made together with an additional comment that use of full text in the document would be clearer than abbreviations.

Council's response and action taken

All suggestions have been considered and have been added to the glossary as appropriate. Full text will be provided the first time wording is used in each chapter then abbreviations.

Q12. Do you have any other observations on the design guide?

Summary of Comments

Consultees made a variety of additional observations, reflecting their particular interests and expertise. Some comments concerned current requirements of existing Development Plan policy, national policy or current practice and procedures. These include the need to identify potentially commercially viable public transport routes, for dwellings to be served by a potentially adoptable road, choice of street materials, SUDS, dwellings to have dual aspect and carriageways to be designed as flexible pavements.

General observations included the following: it is not clear what status the Design Guide will have in relation to the Development Plan. The Council have not gone far enough in promoting shared space as a suitable alternative to traditional streets. It is disappointing the Council is no longer willing to accept the model of on-street allocated parking used in new Gorbals. The requirement for new residential areas to be designed so that no-one is required to walk more than 400 metres from their home to access public transport will curtail development on the

periphery or in the greenbelt. The Design Guide should acknowledge the importance of conservation areas that border potential sites.

It is not clear who will maintain street trees and how these will grow with the requirement for non-frost susceptible materials.

Council's response and action taken

The Guide has been amended to incorporate suggested additions and changes but these have had to be balanced against the need to avoid making the document over long and unwieldy. Where suggested amendments concern existing policy requirements or requirements that do not change to current practice and procedure no change has been made.

The Design Guide will be a material consideration in the determination of planning applications for residential development involving the formation of a new street. It does not prohibit shared spaces but they are not promoted as best practice. The Guide does not promote the Gorbals model as an ideal solution for allocated parking design but neither is it ruled out for flatted developments. A balanced approach with regard to placemaking and other design considerations should be sought. The requirement for new residential areas to be designed so no-one has to walk more than 400 metres from their home to reach public transport is not new but is national policy. Conservation areas have been added to the list of topics for the initial desk top survey. Street trees will be maintained by the Council and tree growing medium will be separated from the road construction.