**Section 1 : About Me**

1. **I am responding as an individual.**
2. **I am a professional with 25+ years’ experience in Urban Design and Landscape Architecture – I am a dual qualified Urban Designer and Landscape Architect. I attained an MSc in Urban Design at UCL Bartlett School of Architecture and was a Chartered Landscape Architect before retirement. My professional work was principally with Local Authorities.**
3. **I am content for this response to be attributed to me. My name is Ms Michèle Rhodius.**
4. **Contact Details in associated e-mail.**

**Section 2 : My views on the proposal**

**Aim and approach**

1. **Which of the following best expresses my view of the proposal to replace the current 30mph default speed limit on restricted roads with a 20mph limit?**

I am partially supportive.

Whilst I am fully in agreement with a graduated speed reduction from the strategic road network through built up areas with a 20mph limit on busy shopping streets, school approaches and all residential areas I consider the blanket Restricted Road approach to be too simplistic. I will elaborate and explain this viewpoint in the ensuing response. (See my response to Question 11 below “**Evaluation of proposal from an Urban Design perspective”**)

1. **Could the aims of this proposal be better delivered in another way (without a Bill in the Scottish Parliament)?**

No.

See my response to Question 11 below “**Evaluation of proposal from an Urban Design perspective”** in which Irefer to the ‘*Urban Design Compendium*’; New Labour Urban Design Planning Policy Guidance; *‘The Manual for Streets 1 & 2*’; Scotland’s ‘Street Design; among other policy and publications since 2000AD all of which was a **voluntary** compliance.

My professional experience of voluntary planning policy and urban design guidance dealing with the less enlightened Transport and Built Environment Planning authorities and the Developers they dealt with proved to me that voluntary policy and guidance was actively opposed.

1. **What do you think would be the main advantages of the proposal?**

A modest speed reduction in some areas.

1. **What do you think would be the main disadvantages, if any, of the proposal?**

See my response to Question 11 below “**Evaluation of proposal from an Urban Design perspective”**

1. **What measures do you think would be needed to maximise compliance with the new national 20mph speed limit on restricted roads?**

See my response to Question 11 below “**Evaluation of proposal from an Urban Design perspective”** and my **2 legislation proposals**. Plus :-

* Enforcement by the Police.
* Motorist education and awareness raising.
* Stronger penalties for contravention.
* Re-education for contravention.

**Financial Implications**

1. **Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:-**
	1. **The Scottish Government :** Some increase in cost without design psychology and cultural change education intervention – significant increase in cost with design psychology and cultural change education intervention
	2. **Local Authorities :** Some increase in cost without design psychology and cultural change education intervention – significant increase in cost with design psychology and cultural change education intervention
	3. **Motorists :** Broadly cost-neutral unless Road Tax is increased to meet capital costs of design psychology and cultural change education intervention in proportion with the distance travelled per annum.
	4. **Other road users and members of the public :** Broadly cost-neutral
	5. **Other public services (e.g. NHS, Fire and Rescue Services, Police) :** Some reduction in cost however this will be dependent upon the effectiveness of the ACTUAL speed reduction achieved. The blanket restricted road speed limit in the absence of design psychology and cultural change education intervention is unlikely to be as effective as a scheme which has evaluated road networks and implements a methodical and targeted speed limit system to a whole city/town/village/rural area.
2. **Do you believe there will be any other benefits to reducing the speed limit from 30mph to 20mph?**

Not until Urban Design best practice principles and ***‘Designing Streets’*** policy is fully implemented to existing and new street design in Scotland.

**Equalities**

1. **What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under Equality Act 2010): age, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation?**

If the Bill is amended to include my two legislation proposals then the consequent improvement to ‘streets’ will result in less traffic, reduced congestion, slower traffic speed and increased social space and this will facilitate a more equalitarian and integrated use of streets and places.

1. **Could any negative impact of the Bill on equality be minimised or avoided?**

Yes, by amending the Bill as currently proposed to include the two legislation proposals in my “**Evaluation of proposal from an Urban Design perspective”** at Question 11 below.

**Sustainability of the proposal**

1. **Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?**

No.

**Economic :** This Bill is trying to save money by a blanket speed limit approach to the behaviour of the motorist and denying that road geometry, layout and design psychology are the fundamental factors in speed reduction. In consequence, ultimately money will have to be spent on retrofitting existing roads and ensuring that new roads are designed to the principles I outline in answer to Question 11 - “**Evaluation of proposal from an Urban Design perspective”** in order for a significant compliance with a 20mph speed limit and a much improved fatality/serious injury rate to be achieved.

**Social :** As long asTransport and Built Environment Planning continues, in the majority of situations, to be NOT about ‘people and place’ the well-being of countless people will continue to be adversely affected by third rate built environment quality and design illiteracy.

According to the 12 February 2016 ‘Urban Update’ article entitled “Streets of Shame” by the Urban Design Group “Trunk road geometry is still being applied in the centre of towns” and “Use out of date approaches to highway design and management could leave highway authorities liable and professional staff in breach of codes of professional conduct.”

**Environmental :** This Bill is essentially ignoring the glaring environmental impacts of the failure of both Transport and Built Environment Planning to implement both best practice urban design advice and the Scottish Government’s design policies. See my “**Evaluation of proposal from an Urban Design perspective”** at Question 11 below.

**General**

1. **Do you have any other comments or suggestions on the proposal to establish a 20mph default speed limit on restricted roads?**

Yes.

**Evaluation of proposal from an Urban Design perspective**

The proposal of this Bill is a simplistic mitigation of an historic and complex problem set rather than a comprehensive solution which positively and radically addresses the failure of both Transport and Built Environment Planning. Successive Westminster and Holyrood Governments have continually allowed silo systems to structure Transport and Built Environment Planning organisations such that specialist professionals design our urban and rural environments from a single, narrow and separatist perspective instead of restructuring these Planning organisations into equalitarian multi-disciplinary teams whose focus is the health and well-being of the people who live in the neighbourhoods of life and who should also be a significant part of that design process. Transport and Built Environment Planning should first and foremost be about People and Place. The Capitalist and free market economy, however, has placed the focus firmly upon the private car, property and consumerism. This economic system assumes exponential growth and inexhaustible resources; none of which is the real world.

The most influential urban thinker, writer, and activist of our time, Jane Jacobs regarded the work of Highway Planners/Engineers as “destructive car-centric planning” (Source : <https://www.transalt.org/news/releases/152> ‘*Statement on the Death of Jane Jacobs*” April 25, 2006) and ‘abominable’ because they do not understand “locality” or “Life Science” (Source : ‘The Death and Life of Great American Cities” Jane Jacobs 1961 p.431). At that time she also censured Planning Theorists and Planners for assuming initially that “Cities were properly problems of (bi-variable) simplicity” and latterly problems of “disorganised complexity” instead of “organised complexity” and developed a theory based upon physical science, rather than Life Sciences, which determined that such a system was “understandable purely by statistical analysis” and “manageable by the conversion of groups into averages” and “probability techniques”. Jacobs goes on to state that “City planning, as a field, has stagnated” (Source : ‘The Death and Life of Great American Cities” Jane Jacobs 1961 p.448-452). This critique which she returns to in her last work “Dark Age Ahead” published in 2004 two years before her death, applies across America, the United Kingdom, Australia and, to a much lesser degree New Zealand and Europe, to the present day. It should be stated that New Zealand post millennium has sought to radically change its built environment policies with a positive emphasis upon the best principles of Urban Design and environmental sustainability. And, yes, there are pockets of enlightening thinking and innovative construction in the UK geared to People and Place nevertheless the predominant approach of Transport and Built Environment Planners prioritises the car in ever increasing quantities and broad-brush statistics over people and place in a vision trammelled by capitalist kerbstones and locked in intellectual stagnation.

The first edition of the *Urban Design Compendium* was published by English Partnerships, the national regeneration agency for England, in 2000 and formed the cutting edge of urban design best principles for the new millennium. The then Labour Government’s Homes and Communities Agency described it as “the latest principles of urban design, how they can be applied and lead to successful places.” (<https://www.gov.uk/government/publications/urban-design-compendium>)

A second more comprehensive edition was published in 2007, just 12 months before English Partnerships (EP) were replaced by the Homes and Communities Agency, and comprised three parts – Urban Design Principles, Delivering Quality Places and online access to 100 Case Studies. Although a third revisionary edition was produced by the Homes and Communities Agency it is the EP editions which achieved International acclaim and renown across the world in the sphere of urban design. In the document “creating the urban structure began with the “Movement Framework” :-

* “The movement framework concerns the structural aspects of movement, focusing on the street and footpath networks.” (Ch. 3 Creating the Urban Structure : 3.1 The Movement Framework p. 34)
* “The movement framework should, wherever possible and practicable, make it as easy and attractive to walk, cycle or take the bus, as it is to travel by car. This means providing the right kinds of route to fit the journeys that people want to make. The reason why one route is better than another depends on countless factors, many of them quite intangible, hence route assessment can never be an exact science. Predicting vehicle movements is only one part of the exercise: how people experience their journey (especially people on foot) is just as important.” (Ch. 3 Creating the Urban Structure : 3.1 The Movement Framework p. 34)
* “Direct, attractive connections between key facilities, avoiding dead ends, help to create more convenient and comfortable places. An assessment of how best the site can plug into the wider movement networks should aim to provide the maximum number of direct connections to main streets carrying through traffic. The more direct the links between main streets, the greater the potential for mixed use (the links do not have to be vehicular). Decide which links are most important to extend into the scheme, to provide the basis for the internal movement structure.” (Ch. 3 Creating the Urban Structure : 3.1.3 Street network p. 36)
* “A successful and sustainable local neighbourhood is a product of the distances people have to walk to access daily facilities, the presence of a sufficient range of such facilities to support their needs, and places and spaces where a variety of activities can take place. These are exemplified by the traditional Victorian and Edwardian suburbs which were built on the assumption that most movement would be pedestrian. Other travel needs were serviced by a suburban rail line – the station providing the focus of retail, commercial and civic activity. Such spatial and use patterns are often difficult to replicate in modern development due to current transport planning regimes, the dispersal of movement patterns facilitated by the car and the trend towards ever larger retail, educational or healthcare buildings in order to achieve efficiencies of scale.” (Ch. 3 Creating the Urban Structure : 3.2 Mixing Uses p. 39)
* “Often the planning system does not help. To illustrate, if we take a typical large site, land uses may include housing, a primary school, shops, offices and some industry. Planning generally zones these uses and gives them relatively fixed boundaries before any serious design work is undertaken. On occasion, sites are carved into development parcels around a rudimentary road system without a clear urban design structure in place. At this stage, it is not unknown for densities to be decided upon, as well as other fixed requirements - open space provision, for example. This approach frequently involves routing the main road round the site rather than across it and locating the traffic generating uses such as retail and employment areas close to entrance junctions and along the main road. The road is used as a boundary to segregate uses. Such attempts to create a sense of place around a focal point often fail because the very uses that generate activity are on the edge of the site or beyond, in a nearby business park or out-of-town centre, and tend to be internalised in ‘big boxes’.” (Ch. 3 Creating the Urban Structure : 3.2 Mixing Uses p. 40)
* “Design the layout of buildings and spaces to help control the flow and density of traffic. Signs and add-on traffic calming features should only be relied on as additional measures.” (Ch. 4 Making the Connections p. 69)
* “Layout is a major influence on how people choose to travel. Over the last 50 years or more the planning of development has been dictated primarily by the geometry of road design, and this has had the effect of encouraging car use, even for journeys which would be much better made by walking or cycling. To reverse this tendency means designing with all forms of movement in mind, not just the geometry of road layouts. What matters is that, wherever possible, movement on foot, by bicycle or by public transport should be as easy and convenient as using the car. This doesn’t mean excluding the car: what is needed is an appropriate balance between traffic and other uses to create attractive, lively, safe and interesting places.” (Ch. 4 Making the Connections p. 70)
* “**Design for convenient cycling :** Cyclists need clear, direct routes which take them to the shops, school or station without stopping short at awkward junctions or obstacles:
* on low-speed streets (below 30 kph: 20 mph) cyclists can mix with vehicles;
* on busy streets, where there may be higher traffic speeds (30-50 kph: 20-30 mph) there should be clearly defined cycle lanes;
* separate cycle tracks are a major incentive for people to cycle, and should be introduced where space allows.” (Ch. 4 Making the Connections : 4.2.1 Design for Convenient Cycling p. 73)
* “**Places not roads :** Adherence to the rigid geometry of road layouts and highway authority adoption standards produces bland, uniform developments. In designing streets, give priority to analysis of the local context, and on that basis design an appropriate network of spaces - such as streets, squares and courtyards. The principle of tracking, described here, and the careful design of junctions, will allow a level of movement to suit those spaces. In already developed areas, the designation of home zones helps produce low traffic speeds (below 30 kph: 20mph) and reinforces the sense of place.” (Ch. 4 Making the Connections : 4.4.3 Streets as Social Places p. 76)
* “But there are many cases where a development inherits an existing street layout that cannot be traffic-calmed except through add-on measures. When that is so, two points to bear in mind are:
* The measures should be designed with pedestrians, cyclists, public transport, service and emergency vehicles in mind.
* Traffic calming measures should be designed to suit the local context, avoiding the use of standard solutions. This is the job of **the urban designer and landscape architect, not just the traffic engineer**.” (Ch. 4 Making the Connections : 4.4.6Traffic Calming and Pedestrian Crossings p. 77)

It can be clearly seen from these quotes that the design approach of both the Local Authority Planning and Highway Departments were recognised pre-2000 as being crucial to both integrated movement modes and speed control; and neither were implementing urban design best practice or delivering quality urban environments. Permeability was a big issue then, too, with the Highway Engineer refusing to concede that if the street network was designed from a Life Science behavioural psychology approach instead of a physical engineered approach then traffic would be slowed and not create so-called ‘rat-runs’ thorough residential areas because it would be time ineffective. To this day this mindset still persists among many Highway Authorities. The result is a road network which is unnecessarily circuitous and carbon/fuel inefficient; and residential areas that are accessible by only one entrance point which increases traffic congestion at these locations on the busier peripheral road network instead of diffusing that traffic load through multiple entrance/exit points.

The “New Labour” Government commissioned both academic, government agency and private urban design practice research from which grew a plethora of urban design planning guidance of the highest quality. Documents like the selected following including some pertinent quotes: -

* ‘***Paving the Way***’ by CABE with the support of Department of Transport, Local Government and the Regions UK (DTLR) commissioned in 2001 published in 2002
	+ “Streets are not just conduits for transport. Streets are where people meet each other. Streets define neighbourhoods. Streets have individual characters and qualities. So why do all the rules and regulations, all the codes and manuals, still treat the street as if it were the exclusive province of the motorist?” (Sir Stuart Lipton, Chairman, CABE)
	+ “The Road Improvement Act of 1925 allowed local authorities to prescribe building lines according to traffic needs, and to chamfer street corners to improve visibility at junctions. That legislation, followed by the Highways Acts of 1959 and 1980, placed increased powers in the hands of the Minister of Transport and of the highway authorities. All government advice on the design of roads and streets, notably *Design Bulletin 32* (DoT/DoE 1992) for residential roads and the *Design Manual for Roads and Bridges* (DETR 1994), reinforced the dominance of vehicle movement as the prime function of streets to the disadvantage of all other uses.” (Ch.2 The Quality of our Streets p.17)
* ***‘Better Places to Live, By Design’*** – A Companion Guide to PPG3’ by CABE pub. 2001
	+ “The lesson from countless traditional towns is that the overall arrangement of buildings and spaces, by obstructing forward vision, induces drivers to go slowly. The same effect can be achieved in new developments by using the technique known as ‘tracking’, as described in *Places, Streets and Movement*. This method gives priority to the arrangement of buildings and spaces, with the carriageway threaded through.” (Ch.32 Managing Traffic)
* ‘***Places, Streets and Movement - A companion guide to Design Bulletin 32 : Residential roads and footpaths’*** by Dept. of the Environment, Transport and the Regions (DETR) : London pub. 1998
	+ “The main result of the emphasis on the movement of cars and vehicles has been that in new developments the roads are designed first, and then the houses are fitted around them. The planning of housing layouts has been dictated first and foremost by the road hierarchy, from the road down to the cul-de-sac or courtyard. The geometry of road design and the highway authority’s adoption standards have frequently created places which relate badly to their locality and are indistinguishable one from another.” (Ch.2 Look at the Place not the Car p.26)
	+ “Wherever possible, traffic speeds should be managed by the arrangement of buildings and spaces. Physical traffic calming measures, such as speed humps and chicanes, should be regarded as back-up measures where the layout alone does not produce low speeds. The aim should be to take account of traffic calming at the earliest stages in the design process, not to add it as an afterthought.” (Ch.3 Traffic Calming p.60)
	+ **“In many areas it is desirable to have average speeds much lower than 20mph. It is better to achieve this through the careful design of the street layout, rather than by trying to introduce lower speed limits, which may be unenforceable**.” (Ch.3 20mph speed limit zones p.63)
* ***‘Urban Design : Why don’t we do it in the road? Modifying Traffic Behaviour through Legible Urban Design’*** by Ben Hamilton-Baillie, internationally acclaimed Urban Design and Movement Specialist : published in ‘The Journal of Urban Technology’ Volume 11 No. 1 pp.43-62 in 2004 Quotes are taken from his 2005 ICE publication ***‘Improving traffic behaviour and safety through urban design***’.
	+ “The immediate environment of our urban areas is dominated by kerbs, road markings, bollards, traffic signals, barriers and signs. We negotiate our journey through a city landscape fashioned by traffic engineering. The rules that govern this landscape have little in common with the special cultural history and values that have shaped the architecture and the unique signature of the place. Indeed, the overarching principle governing the foreground has its roots in the desire for consistency, conformity and predictability. Traffic engineering seeks uniformity and unambiguous clarity, demanding the same standards, whether the backdrop is Fort William or St Austell.”
	+ The effect of traffic engineering on the public realm is difficult to overstate. In many cities in the USA, over 70% of the urban space is made up of streets and car parks (Fig. 1). Even in the UK, 30–40% of public space lies in the realm of the traffic engineer. **Yet these professionals receive no training in urban design and usually (unsurprisingly) place little value in achieving good-quality places, preferring instead to focus on optimising traffic capacity and safety**.
* ***‘Home Zones : Challenging the Future of our Streets’*** by The Department for Transport, UK Government : pub. 2005
	+ “Home Zones are a relatively new concept in the UK. They aim to extend the benefits of slow traffic speeds within residential areas and give greater priority to non-motorised users. Importantly, they use design to limit vehicles to very low speeds, well below 20mph. The aim is to improve the quality of life in residential roads by making them places for people, instead of just being thoroughfares for vehicles. This should encourage people to use streets in different ways. Drivers should feel that the car is a guest in the street.” (Section 1 Introduction P.5)
	+ “The design of a Home Zone is crucial to achieving the low speeds necessary for the scheme to be successful and for activities to take place safely.” (Section 4 Design P.64)
	+ “Vehicles must be accommodated within the Home Zone as an integral part of daily life, but they must share the space with cyclists and people on foot. Motorists should feel that they are a ‘guest’ in the street.” (Section 4 Design P.64)
* ***‘Manual for Streets*** 1’ (MfS 1) was published in 2007 by the Department for Transport (DfT) in collaboration with 4 private Consultancies, Communities & Local Government and the Welsh Assembly after extensive research dating back to at least 2003. This document replaced both *Design Bulletin 32*and it’s companion guide *Places, Streets and Movement* which were withdrawn.

***Manual for Streets 1*** was a milestone in street design intended by both Urban Design practitioners and the Department for Transport to be a radical game-changer in the design of residential streets :-

* “MfS updates the link between planning policy and residential street design. It challenges some established working practices and standards that are failing to produce good-quality outcomes, and asks professionals to think differently about their role in creating successful neighbourhoods. It places particular emphasis on the importance of collaborative working and coordinated decision-making, as well as on the value of strong leadership and a clear vision of design quality at the local level.” (Preface p.7)
* “Research carried out in the preparation of *Manual for Streets* indicated that many of the criteria routinely applied in street design are based on questionable or outdated practice. For example, **it showed that, when long forward visibility is provided and generous carriageway width is specified, driving speeds tend to increase**. This demonstrates that driver behaviour is not fixed; rather, it can be influenced by the environment. MfS addresses these points, recommending revised key geometric design criteria to allow streets to be designed as places in their own right while still ensuring that road safety is maintained.” (Preface p.7)
* “MfS focuses on lightly-trafficked residential streets, but many of its key principles may be applicable to other types of street, for example high streets and lightly-trafficked lanes in rural areas. It is the responsibility of users of MfS to ensure that its application to the design of streets not specifically covered is appropriate. MfS does not apply to the trunk road network. The design requirements for trunk roads are set out in the *Design Manual for Roads and Bridges* (DMRB).” (Status and Application p.5)

And, yes, this guidance was only applicable in England and Wales. However, in 2009/10 that situation was going to change in Scotland. The important thing to recognise here is that all of these documents were the precursor to subsequent radical change in Scotland policy and guidance.

In September 2010 ***Manual for Streets 2*** (MfS 2) was published by The Chartered Institution of Highways & Transportation (CIHT) in partnership with two principal private multi-disciplinary Consultant teams, Commission for Architecture and the Built Environment (CABE), DfT, Homes & Communities Agency, Communities & Local Government, English Heritage, The Association of Directors of Environment, Economy, Planning and Transport (ADEPT), Transport for London, CHIT and a host of professional contributors. ***Manual for Streets 2*** is a companion guide to ***Manual for Streets 1*** and where “MfS 1 focuses on lightly trafficked residential streets it also states that a “street is defined as a highway that has important public realm functions beyond the movement of traffic…..Most highways in built up areas can therefore be considered as streets.” MfS 1 also stated that, “many of its key principles may be applicable to other types of streets, for example high streets and lightly trafficked lanes in rural areas.” “MfS 2 builds on the guidance contained in MfS 1, exploring in greater detail how and where its key principles can be applied to busier streets and non-trunk roads” thereby filling a perceived gap between MfS 1 and The Design Manual for Roads and Bridges which is the design standard for trunk roads and motorways in the whole of the UK. (Source : MfS 2 Status and Application p.4)

Among a long list of design principles MfS 2 advocates design “***to keep vehicle speed at or below 20mph in streets and places with significant pedestrian movement unless there are overriding reasons for accepting higher speeds***” and the use of the “minimum of highway design features necessary to make streets work properly.” (Source : MfS 2 1.2 MfS Principles p.8)

It is worth noting here in terms of Rural Roads MfS 2 stated that many ‘A’ roads are “single carriageway here the speed of HGVs is limited to 40mph and this acts as a speed restraint on car speed. I live in rural Scotland, in the Highlands and I can testify to the fact that most HGVs currently ignore the 40mph rule and utilise the national speed limit of 60mph to the extreme danger of all pedestrians and cyclists. Enforcement is key and the much-depleted Police Force is unable or unwilling to monitor speed in rural areas. (Source : MfS 2 2.8 Context – Rural Areas p.26)

***‘Design Bulletin 32’*** (DB 32), providing guidance on the layout of residential roads and footpaths, was first published in 1977 and, in 1992, ‘***The Manual for Roads and Bridges’*** (DRMB) providing comprehensive standards, advice notes and design details relating to the design, assessment and operation of trunk roads, including motorways in the United Kingdom. Both of these documents became the ‘bible’ of the Highway Engineer for designing every road in Britain. These were the authoritative texts of every Highway Engineer who seldom stepped outwith their constraint into the realms of innovation and creative thinking. Unlike Bridge and Structural Engineers, the Highway Engineer did not function as a designer or exhibit creative design expertise preferring to be constrained by risk aversion and safety and strict adherence to tram-lined guidance. In the present day, it can be clearly evidenced in developments across the UK that some Highway Engineers are indeed practicing the innovation inspired by MfS 1 & 2 whereas a significant majority still exhibit no understanding of the principles of people, place and integrated movement. There is NO EXCUSE for the resultant poor design, seas of tarmacadam monotony and roads (not streets) continually built for cars with priority given to travelling from A to B as fast as possible – road geometry belying whatever the Highway Engineer might claim to the contrary.

Of all the cities in Scotland, Edinburgh has probably been at the forefront of urban and street design policy in the 3rd millennium. The **‘*Edinburgh Standards for Urban Design’*** were introduced in 2004, updated in 2009 and took the form of Supplementary Planning Guidance. Also in 2009 Edinburgh City Council initiated an Urban Design Panel whose remit was to “review Council planning policy & guidance with design significance.” (‘*The Edinburgh Standards for Urban Design – Review’* : Planning Committee Report Item 22 : 6 August 2009 p.4) That was followed in 2006 by **‘*The Edinburgh Standards for Streets*’** which very much set out to create a walkable and visually appealing city streetscene. These standards were superseded in 2015 by the **‘*Edinburgh Street Design Guidance*’** which states that street design “is about every street in the city” (p.3) and that “For too long we have put car based movement ahead of the needs of pedestrians, cyclists and public transport users when designing streets. While most streets will require to accommodate car use, we need to achieve a much better balance, where the street environment positively influences driver behaviour and where other street uses, sense of place and other forms of travel are put before speed of movement by car.” (p.3) The **‘*Edinburgh Street Design Guidance*’** is a comprehensive street design policy suite which incorporates urban design best practice, encourages innovative design, and “design to influence road user behaviour, helping reduce vehicle speeds and thus improving safety, particularly for pedestrians and cyclists.” (p.10)” Place” and “Movement” are key design criteria for both existing and new streets and the Guidance states that “Edinburgh is the first 20 mph city in Scotland with 30mph and 40mph speed limits only maintained for a limited arterial network. Therefore the default design speed for new streets is 20 mph.” with a few clearly defined exceptions. (p.19) **Two important factors to note here are that the Guidance emphasises the use of innovative design to modify driver behaviour not off-the-peg engineered solutions; and refers to the *design speed* of streets in the 20mph limit which emphatically prohibits the typical design speed of 30-40mph for residential streets.**

In June 2009 the Scottish Government published ***‘National Planning Framework for Scotland 2’*** which emphasised the “importance of Place” in attracting “well-educated, talented people and capital flows to places which have the sort of physical and social infrastructure which supports innovation.” It recognised that “The environmental quality, built heritage and cultural life of Scotland’s cities and towns are therefore strong economic assets and planning policies must place emphasis on supporting and enhancing them.” Equally, “A positive sense of place is just as important in rural areas. As the rural economy changes, a high quality environment and a strong cultural identity will be key assets in promoting sustainable growth, economic diversification and community development.” (Source : ‘*National Planning framework for Scotland 2’* : Key Challenges Paras.13/14 p.4) In terms of the built environment the Framework states :-

* “The application of appropriate planning, design and building policies can achieve more sustainable urban forms and much higher energy efficiency and emission standards in new development.” (Built Environment Para. 80 p.28)
* “Some 20th Century residential developments promote high car dependency and may require substantial, imaginative reworking.” (Built Environment Para. 80 p.28)
* “Our built heritage, including urban conservation areas, will need sensitive treatment.” (Built Environment Para. 80 p.28)

In 2010 the *National Planning Framework* was followed up by the publication of a suite of Policy Statements each dealing with individual aspects of the built environment; importantly, in the context of the proposed 20mph Bill, the Policy Statement ***‘Designing Streets’.*** In the Foreword John Swinney, the then cabinet Secretary for Finance and Sustainable Growth, stated “This document underpins Scottish Ministers’ resolve to move away from a prescriptive, standards-based approach in order to return to one which better enables designers and local authorities to unlock the full potential of our streets to become vibrant, safe and attractive places” and he welcomed “*Designing Streets* as a new policy document which puts place and people before the movement of motor vehicles.” (Source : ‘*Designing Streets*’ by The Scottish Government 2010 Foreword). ***‘Designing Streets’*** also replaced both ‘**PAN 76 New Residential Streets’** and “all previous road guidance and standards documents based on” ***‘Design Bulletin 32’*** (Source : ‘*Designing Streets*’ by The Scottish Government 2010 : Policy Relationship p.3). Significantly, “*Designing Streets* was developed for the Scottish Government by a **multi-disciplinary team** of roads and transportation engineers, urban designers, planners and legal advisors, led by WSP UK” and “aimed at everyone who plays a part in creating or determining the quality of streets; architects, engineers, planners, developers, politicians, local authorities and, indeed, anyone who has an interest in how street design is taken forward.” The document also understood the limitations of DRMB and stated:

*“Design Manual for Roads and Bridges (DMRB)*5 is the standard for the design, maintenance and improvement of trunk roads and motorways. There are some locations, however, where a more sensitive design that follows the principles of *Designing Streets* may well be appropriate, such as where a small burgh High Street is also a trunk road.” (Source : ‘*Designing Streets*’ by The Scottish Government 2010 : The relationship of *Designing Streets* to main and busy streetsp.4)

Crucially ***‘Designing Streets’*** recognised the vital importance **of multi-disciplinary teamwork and Community participation** thus :

“**Most importantly, a multi-disciplinary approach, full community engagement and a balanced appreciation of context and function is fundamental to successful outcomes in such cases**.” (Source : ‘*Designing Streets*’ by The Scottish Government 2010 : The relationship of *Designing Streets* to main and busy streetsp.4)

Key principles of ***‘Designing Streets’*** are :

* “Creating good streets is not principally about creating successful traffic movement: it is about creating successful places.” (p.7)
* “In the more recent past, vehicle movement has often dominated the design of streets, resulting in many streets being out of context with their location and overly influenced by prescriptive standards. The prime concern of *Designing Streets*, in contrast, is to reverse this trend and shift the focus firmly back to the creation of successful places through good street design.” (p.7)
* “Movement status can be expressed in terms of traffic volume and the importance of the street, or section of street, within a network. Movement status should be considered in terms of all modes of movement, including vehicle traffic, pedestrian and cycle flows and public transport.” (p.8)
* “*Designing Streets* is national planning policy and its policies should be taken into account by local authorities when determining planning applications and producing guidance. Designing Places and Designing Streets stand together as the two key design policy statements for Scotland.” (p.9)

***‘Designing Streets’*** isa very comprehensive street design policy document which details design psychology for the structure, pattern and layout of the street for all movement modes such that design is used to “influence driver behaviour” and “reduce vehicle speeds” noting that “**Psychology and perception –** play a strong part in influencing driver behaviour”. The document places greater emphasis upon a range of “speed-controlling features” rather than purely speed humps taking a more sophisticated psychological rather than crudely physical approach to design. (p.32)

It is clear that the Scottish Government, through its Built Environment and Architecture & Place legislation and policies is demanding a very high quality urban environment in terms of architecture and street innovative design. However, outside of Edinburgh is this happening? That policy has been in place since 2009, 8 years, and what has changed in Scotland’s cities, towns, villages and rural areas? How are roads becoming streets? Where are the ***new*** streets which create a sense of place and integrate movement? Where are the streets which sing innovation and people?

And, more importantly in the context of this ***Proposed Restricted Roads (20mph Limit) (Scotland) Bill,*** where are the ‘streets’ throughout Scotland’s cities, towns and villages which DO NOT place vehicle-based movement as the dominant transport mode and instead, by design, reduce traffic speeds to 20mph in all residential neighbourhoods, High Streets, busy neighbourhood streets and places with significant pedestrian movement? Where is the integration and equality of movement? Why is the ‘road’ geometry unchanged? Why have Transport and Built Environment Planning not implemented 17 years of (UK) policy and guidance? Why have Transport and Built Environment Planning remained in stasis? Why have they not progressed?

No. Instead, monotony, cloning, and standardisation still rules our living Neighbourhoods and High Streets. Why? Because, as I stated in my opening paragraph, Transport and Built Environment Planning still operate in separatist silos and do not function as ONE MULTIDISCIPLINARY TEAM.

Design innovation and creativity are not expensive solutions. The education of Planners and Transport Engineers at University in Urban Design, indeed design itself, is crucial to changing our built environment.

Where a 20mph speed limit in residential areas, community activity areas, city/town/village high streets is undoubtedly beneficial to human health and well-being the consequence of this Bill being passed into law, as it is currently proposed, will be to sanction the continuation of substandard separatist Transport and Built Environment Planning and third-rate built environments disarticulated by unconstrained traffic growth.

There is no doubt, based upon the evidence presented together with the Bill Proposal, that a 20mph speed limit imposed upon all Restricted Roads may have some modest effect. It is clear, however, from the experience of the city of Portsmouth in particular that narrow roads lined with parked vehicles are very effective in terms of speed control. These roads were not designed for the car and even without being lined with parked vehicles their geometry is simply enough to constrain speed. Unlike modern roads designed for traffic predominantly with generous carriageway widths, relatively unrestricted forward visibility and excessive Quadrant kerbstones radii at junctions all of which facilitate speeds in excess of 30/40mph.

To impose a blanket speed limit without enforcing change in the design of Scotland’s Built Environment by legislating compliance with Built Environment policy is to legislate for failure.

As I have detailed in my argument above, the solution to speed control is a little more complex and I would strongly advocate that :-

**This Bill should legislate** that Transport and Built Environment Planning be brought together to work as a multidisciplinary team under the auspices of a restructured Planning Department whose Director/Head is a Masters qualified Urban Designer. The in-house team should at a minimum comprise Urban Designers, Landscape Architects, Architects, Planners with design expertise, Highway Engineers with design expertise, Housing Officers, Heritage Conservationists where necessary, Ecologists where necessary and Human mental and physical health specialist(s).

 The out-house team should comprise Members of the Public and Stakeholders in the Neighbourhood(s)/District directly affected, Councillors, Community Organisations, City/Town/Village Centre Managers, Local Artists, Scottish Natural Heritage, SUSTRANS, Cycling Scotland any other individuals and groups relevant to the project goals.

**This Bill should legislate** that the Scottish Built Environment policy statement ***‘Designing* Streets’ is made compulsory by Law.** The voluntary status of this policy is clearly not working. The policy is largely being ignored. It has been ignored for nearly 2 decades – how much more proof is required that such action is necessary?