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Our Ref: IHBC/03/09/RC
Your Ref:



Transport Admin. Team
The Scottish Government
Area 2-E, Victoria Quay
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EH6 6QQ

Richard Cartwright
Consultations Secretary
Environmental Services
Fleming House,
Cumbernauld G67 1JW
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Dear Sirs,

CONSULTATION ON DESIGNING STREETS

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The Scottish Branch of the Institute welcomes the opportunity to comment on this consultation paper, and we attach our comments, which are focussed on those aspects of the consultation which particularly impact on the quality of our historic built heritage environment.

The Scottish Branch of the Institute of Historic Building Conservation is glad to have the opportunity to input to this consultation, and would be grateful if you could consider these points in the revisions to be made to Designing Streets.

Yours sincerely,

Richard Cartwright
Scottish Consultations Secretary
Institute of Historic Building Conservation

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A. General Comments

1. The key aspects of Designing Streets listed in Section 3.12 are supported by the IHBC.
2. Respecting historic character and re-inforcing the special qualities of a place should be emphasised as the most important policy objective of this document.
3. References to contributing to/ improving the quality of the built environment are welcomed.
4. We consider that there needs to be a clearer distinction in the document between policy and suggested good practice (guidance or advice).
5. The document is too long and in consequence its usefulness and use will suffer.
6. The merit of this document being supplemented by local Supplementary Guidance should be promoted- the latter can usefully further help to foster local distinctiveness, eg in advocating and approving a limited pallet of materials for surfacing and street furniture.

B. Local Distinctiveness & Character

1. The following Key Policy Principle from the Executive Summary is supported:
 - Making streets distinctive and diverse by developing street character types on a location specific basis
2. Section G2.11 on Local Distinctiveness is strongly supported.
3. Character analysis of a place should be encouraged in the document, perhaps with a helpful reference to the principles contained in PAN71 for Conservation Areas.
4. The particular importance of Conservation Areas should be referred to as a prime example of local distinctiveness.
5. See General Comments 2 and 6 above.

C. Place

1. Paragraphs 1.3.2 to 1.3.4 are supported by the IHBC.
2. See General Comment 2 above.

D. Parking

1. Paragraph 5.3.6 The merit of Scottish Government guidance on parking standards for particular situations should be considered.
2. An acknowledgement of the importance of on-street parking as a feature of Scottish places should be highlighted in the document.

E. Traffic Signs

1. The document should more strongly advocate the minimum signage required for place identification, direction and naming.

D. Street Furniture

1. Section G8.2 especially paragraphs G8.2.1 to 8.2.4 are supported.

E. Lighting

1. Section G8.3.8 is supported.
2. The potential importance of street lighting to design should be highlighted more in the document (paras 1.2.6 and 1.3.10 give minimal references).

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F. Photo examples used

The use of the following photo examples of good practice is supported:

1. Fig G3.1 Edinburgh New Town- scale that encourages walking
2. Fig G5.9 On street parking in centre of street in Glasgow
3. Fig G7.7 Design contributes to sense of place and reduces clutter (a multi- function, attractive post).

Also the use of the following photo example of poor practice is supported:

4. Fig G7.1(a) showing excessive sign clutter

However we have some concern over the use of the following examples:

5. Fig 1.4 Melrose Town Centre as an "example of streets where a recent innovative design approach retains both a high place and movement function." Melrose has been designated an Outstanding Conservation Area and the IHBC considers that one way system and pedestrianisation introduced have adversely impacted on its quality of place and not properly respected existing character.
6. Fig G3.6 "Uninviting pedestrian link- narrow, not well overlooked, unlit (Edinburgh)" – whilst this could be improved by cutting back overhanging vegetation at the entrance, and possibly by lighting, the space formed by the enclosing stone walls is an attractive one.

G. Case Study Examples

1. The IHBC considers that more examples of good practice should be included in the final document, from Scotland wherever possible.
2. Case study G11 Polnoon Outstanding Conservation Area- the intention to include this as a case study in the final document is supported by the IHBC.