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RESPONSE TO SCOTTISH EXECUTIVE CONSULTATION

A POLICY ON ARCHITECTURE FOR SCOTLAND PUBLIC CONSULTATION: REVIEW OF POLICY

Homes for Scotland is the representative body for the private home building industry in Scotland. In 2005 some 24,000 dwellings were constructed in Scotland, 18,000 of which were built by the private sector without recourse to public subsidy. Homes for Scotland represents the interests of about one hundred companies who provide 95 of every 100 homes built for sale in Scotland and we have a rapidly expanding membership of professional and other service businesses engaged in our industry.

In general terms, our member companies are supportive of a Policy on Architecture for Scotland that promotes good design. However consultations on the present review confirmed that many members found the current policy to be vague, ambiguous and without coherent objectives.

Responses to the questions raised in the consultation document are as follows:

CO-ORDINATION AND CROSS CUTTING ISSUES

- The policy should be concerned with raising awareness of good quality architecture and its contribution to sustainable development.
- The way in which the policy is articulated is important. It should not be articulated in vague generalities. However difficult it might be, the policy must be articulated in a way that allows the setting of tests/benchmarks against which projects can be evaluated.
- It is imperative that the Executive should audit all policy initiatives that impact on the built environment to ensure that no initiative conflicts with design objectives. There needs to be a better understanding of the ways in which regulatory regimes, which seek cost effective engineering solutions to infrastructure provision, can or do inhibit the achievement of wider design initiatives. A classic example can be found in our current approach to roads engineering where the ambition to move vehicles safely at speed can have a brutal impact on the environment in visual terms. Another can be found in sustainable urban drainage systems where safety considerations often inhibit opportunities for creating satisfactory landscape settings. Design gains will never be achieved if regulatory authorities do not acknowledge that design must be at the heart of engineering solutions.
- In terms of raising awareness of the value of building design the Scottish Executive should lead by example. It is imperative that when the Scottish Executive is procuring a public building or is in a position to “authorise” the procurement of a public building by local authorities or other public bodies, they should seek to obtain buildings of strong architectural quality commensurate with budgetary constraints.
- Until such time as the policy is articulated in ways that would allow benchmarking it is extremely difficult to identify a target audience let alone a mechanism for raising awareness.

RAISING DESIGN STANDARDS AND BUILDING QUALITY

- It is important to raise awareness of design issues with development industry professionals while at university. In addition professional bodies such as the RTPI, RICS and RIAS should encourage their members to recognise the more commercial view that good design is not always about providing true value for money.
- If gains are to be achieved it is important to put design at the heart of the planning process. When dealing with development applications most Planning Authorities are primarily concerned with securing measures to mitigate any detrimental impact of the development proposal with the expectation that housing developers will fund and provide supporting infrastructure and community facilities. Inevitable this means that design matters are relegated to a lower order consideration.
- The way in which the Planning System deals with design matters needs to be urgently reviewed. Most Planning Authorities are under resourced in terms of producing design briefs and preparing master plans. In addition the present system of allowing design decisions to be taken by elected members, who are in the main not skilled design professionals is not conducive to the promotion of good quality design. Planning Committees should be responsible for setting design policies and should not have a role in design evaluations. PAN 67 on Housing Quality states [on page 32] “Councillors have an important role to play in the planning of housing, setting out principles rather than becoming involved in design details.
- A+DS should cease to carry out their design review function. Design review comes far too late in the process to be seen as anything other than a narrow regulatory function. Criticism of fully worked up designs can create a climate of resentment when projects have to be completely reworked and modification often results in unsatisfactory compromises in order to obtain consent. It would be far more productive for A+DS to expand both its advocacy function and its deployment of “Enablers” to work with design teams and on behalf of Planning Authorities to influence emerging design solutions.

PUBLIC ENGAGEMENT AND COMMUNITY INVOLVEMENT

- The Minister for Communities is currently undertaking a consultation exercise on Community Involvement in the Planning Process and is working with a wide range of stakeholders covering local communities, the environmental lobby, the development industry and development industry professional bodies. The models of community engagement emerging from this exercise can be used to improve engagement on design matters. Beyond that it is important for the Executive to promote and publicise examples of buildings and public spaces, which have enhanced the quality of Scotland’s towns and cities. Specifically in the field of housing, Homes for Scotland remains committed to work with the Scottish Executive to promote good design through initiatives similar to the Annual Finnish Housing Fair. Homes for Scotland welcomes the Six Cities Initiative but believes that to have any impact such initiatives must be repeated over a sustained period.

PLACE MAKING / URBAN DESIGN / LANDSCAPING

- In its current vague articulation it is difficult to assess how the policy can support the place making agenda with its emphasis on context and layout. On a practical level gains could be achieved by specific direction to A+DS to promote the place making agenda as set out in current Planning Advice documents.

- It is clearly easier to deal with public realm issues when comprehensive development or redevelopment is being undertaken although gap site development can on occasions have a significant impact. It is the experience of the house building industry that public realm matters are often introduced as an after thought when planning authorities are seeking to capture a portion of the uplift in development value. It would be far more appropriate for planning authorities to seek to have public realm matters dealt with when preparing development briefs.
- The national bodies charged with managing Scotland's historic heritage are, rightly or wrongly, perceived by the development industry as being anti-development and hostile to private investment driven by requirements to generate a return on capital investment. These bodies need to promote investment in a more proactive way or, at least, should not be perceived as doing the opposite. Given the inevitable limitation placed on resources available for investment in historic buildings there is an urgent need to set priorities for investment and to assess the basis on which we identify buildings to be conserved/preserved. It is not sufficient to argue for the retention of buildings just because they are old.

PROCUREMENT

- Homes for Scotland would not propose to comment on public sector procurement.

SUSTAINABILITY

- In terms of housing design there are probably as many definitions of sustainable housing as there are commentators in the field. The work being undertaken by "Sust: The Lighthouse on Sustainability Initiative" with some of Homes for Scotland's member companies is helping to identify costs and benefits of different approaches to design and procurement. The Scottish Executive should increase the resources made available to this programme and should work more closely with the industry to provide specific advice on sustainable design based on practical built out examples.

INTERNATIONAL PROMOTION AND NETWORKS

- While it is laudable for the Executive to promote Scotland as a centre of excellence, greater emphasis needs to be placed on encouraging Scotland's designers and Planning Authorities to learn from good practice in Europe and beyond. These programmes should not be aimed at the exchange of high profile government delegations. They should be targeted at practitioners and encouraged through educational initiatives such as CPD programmes.

MANAGING AND UNDERSTANDING CHANGE IN THE BUILT ENVIRONMENT

- In an urban setting where development is being procured in a context of well-defined hard edges significant gains are being made. The challenge to the house building industry remains the building of low density family housing at the edge of settlements. Our current planning system is ill equipped to deal with this challenge and closer working is required between A+DS, Planning Authorities, Homes for Scotland and our member companies. There is an urgent need to build on the recent initiative taken by Homes for Scotland, Sust, and A+DS in respect of sustainable buildings in Scandinavia and the proposed initiative between these bodies relating to place making in the Netherlands. Homes for Scotland

would suggest that additional Scottish Executive resources to promote an enhancement of this programme would be beneficial.

EDUCATION AND RESEARCH

- Given the significant impact which housing development has on our urban and suburban environments it is disappointing to note how little emphasis is given to housing design and the design of housing layouts in our Planning Schools. There is arguably a case for encouraging planners and architects to graduate with a specific qualification in housing design and construction.

In conclusion Homes for Scotland would wish to record its appreciation of the opportunity to comment on this consultation and would be happy to elaborate on any of the points made.

Edinburgh
28th July 2006