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Date: 06 September 2012
Our Ref: IHBC/12/07/RC
Your Ref:



Consultation on Policy on Architecture & Placemaking
Scottish Government
Area 2J(S)
Victoria Quay
Edinburgh EH6 6QQ

Dear Mr Mitchell

CONSULTATION on a POLICY on ARCHITECTURE & PLACEMAKING for Scotland 2012

The Institute of Historic Building Conservation 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 of Historic Building Conservation (IHBC) welcomes the opportunity to respond to this consultation. I attach a completed Consultation Questions and Respondent Information document, but in addition I set out overleaf a number of other observations which do not sit readily against one of the consultation questions.

If you wish for clarification or further discussion on any matter raised by us, please contact myself initially.

Yours sincerely,

Richard Cartwright
Scottish Consultations Secretary, Institute of Historic Building Conservation

CONSULTATION on a POLICY on ARCHITECTURE & PLACEMAKING for Scotland 2012-

INSTITUTE OF HISTORIC BUILDING CONSERVATION OVERALL OBSERVATIONS

1. The IHBC is surprised there is no mention of a review of existing policy on architecture and how existing design policy is being applied.
2. The document does not state where any new policy will sit as part of or in relation to Scottish Planning Policy, and also the Scottish Government's Regeneration Strategy, and this should be made clear.
3. We consider there should be further consultation on any draft policy produced as a result of the current consultation.
4. There is a great need for changes to be made in educational programmes, to produce architects and other design professionals with the overall design and technical skills needed in today's real world; this should include preparing cost plans and putting funding packages together to deliver a project.
5. There is currently no procedure or requirement in place for Design Review, which it would be helpful to establish to cover all major public building projects.
6. The IHBC welcomes the inclusion of the Heritage dimension in Theme 4 of this consultation, but we feel this needs to be better integrated across the whole document.
7. More prominence should be given to existing buildings and places in any new policy document; the consultation document is too focussed on new buildings.
8. There is a need to stress the central role of Heritage (both buildings and areas) in defining place in Scotland, both to assist appreciation of the historic environment, which forms such a key part of Scottish identity, and to give a firm basis for new design and place making of local distinctiveness.
9. There is a need for the policy to develop an emphasis on renovation and reuse of existing fabric (the most truly dreadful existing buildings can often be stylishly adapted for a new use at lower cost than new development), infill of existing urban fabric and other incremental change based on urban design frameworks. This is likely to be a lower cost option for Scotland as a whole than a philosophy which gives primacy to major new developments and iconic buildings.
10. Whilst we are aware of the Scottish Government's overarching theme of supporting sustainable economic growth, we believe that for the purposes of the current consultation it would be better to list this as Theme 4 rather than Theme 1.
11. The Scottish Government should make clear in the final document its own commitment and proposals for setting the highest standards of architectural design and placemaking in government led projects.

A POLICY ON ARCHITECTURE AND PLACE-MAKING FOR SCOTLAND: Public consultation 2012



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Institute of Historic Building Conservation

Title Mr

Surname

Cartwright

Forename

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3. Permissions - I am responding as...

Individual / Group/Organisation Yes

Please tick as appropriate

<p>(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?</p> <p>Please tick as appropriate <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>(c) The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site).</p> <p>Are you content for your response to be made available?</p> <p>Please tick as appropriate <input type="checkbox"/> Yes</p>																				
<p>(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis</p> <p>Please tick ONE of the following boxes</p> <table border="1"> <tr> <td>Yes, make my response, name and address all available</td> <td><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">or</td> <td></td> </tr> <tr> <td>Yes, make my response available, but not my name and address</td> <td><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">or</td> <td></td> </tr> <tr> <td>Yes, make my response and name available, but not my address</td> <td><input type="checkbox"/></td> </tr> </table>	Yes, make my response, name and address all available	<input type="checkbox"/>	or		Yes, make my response available, but not my name and address	<input type="checkbox"/>	or		Yes, make my response and name available, but not my address	<input type="checkbox"/>	<table border="1"> <tr><td> </td><td> </td></tr> </table>										
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<p>(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?</p> <p>Please tick as appropriate <input type="checkbox"/> Yes</p>																					

CONSULTATION QUESTIONS

Q1: How could the policy promote higher quality design in order to contribute to Scotland's economic growth?

- 1.1 by supporting SUSTAINABLE growth or development, which is the overriding objective of the SG (not just growth)
- 1.2 by promoting better infrastructure in LPA's, including skills and capacity, through human, regulatory and financial resources
- 1.3 by improving awareness of the economic benefits of good design
- 1.4 by promoting closer working between the public and private sector in terms of assisting their quality objectives.
- 1.5 by more strongly recognising and supporting the contribution heritage led regeneration can make.
- 1.6 in some cases (eg Glasgow's new riverside museum) an iconic project has been used as the catalyst for successfully attracting further investment.
- 1.7 Policy requiring good design needs to be universally applied and sustained over long periods to avoid its gradual subversion.

Q2: How could the policy better embed the benefits of good design in economic, social and environmental terms within procurement processes?

- 2.1 by promoting greater use of a minimum quality score in procurement evaluation (failure to meet this resulting in disqualification from the tender process)
- 2.2 by setting SG and LA standards, and enforcing these through regulation
- 2.3 by facilitating better inter-disciplinary training & awareness for Built Environment and Heritage service providers
- 2.4 by promoting enhanced skills and role of, and support for, voluntary sector as representing third party interests.

Q3: How could the policy ensure that the aim of achieving a low carbon economy is at the heart of development processes?

- 3.1 by encouraging the use of local materials, skills and businesses
- 3.2 by encouraging building refurbishment more effectively, including through reduced VAT, and thereby discouraging carbon resource intensive demolition and redevelopment
- 3.3 by promoting and encouraging building care & maintenance as an intrinsic part of the planning & development process, eg by including whole life costings, including RMI in cost projections. A Life Cycle Assessment of energy and other environmental impacts and costs as part of the design process is urged, covering all stages- design, construction and use over a building's projected design life.
- 3.4 by the promotion of exemplar schemes and creative funding packages.

Q4: How could the policy contribute to the delivery of environmentally sustainable places?

- 4.1 In addition to the answers to Qn 3 above all of which are relevant here...
- 4.2 by giving greater policy strength to require or favour the use of long-lasting quality materials, eg natural slate, over cheaper, less-lasting and lesser quality materials, eg concrete roof tiles.

4.3 by considering how local community buy-in can contribute to sustainable development
 4.4 by requiring single clear guidance from a LA on design; at present there is minimum uptake of Designing Streets principles due to the fact that the Roads Construction Consent process has not been tackled and integrated.
 4.5 by requiring LA's, where they introduce eg a new Schools Program, to introduce in parallel to this a Re-Use of Existing Schools Program. This equally applies to other public buildings including libraries and health service buildings.

Q5: How could the policy encourage design processes that better meet the needs of individuals and communities?

5.1 by the SG introducing further PAN advice and guidance on this matter
 5.2 by the promotion/ publishing of further best practice guidance on the successful involvement of communities in design processes
 5.3 by better integration of community groups into the development process through consultation and perhaps involvement in the procurement process.
 5.4 recognition that local groups are well placed to provide input on the local context for development and regeneration should be given.

Q6: What should the short term, medium and long term priorities of policy now be? Possible issues for consideration could include:

	short	medium	long
Supporting innovation and emerging practice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Affordability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sustainability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing hotspots	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Street design	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High streets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mixed-use neighbourhoods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brownfield sites	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
International promotion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other: please describe below:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Vacant/ derelict/ redundant Buildings
 Spaces between Buildings (require better promotion of importance of design here)
 Educational Reform (to ensure Professionals are trained for the real world)

Any comments you wish to make about your choices - see above.

Of the issues listed above, IHBC affirms the clear current need for priorities to be given to Sustainability, encouraging good Street Design (see our comment on RCC under Qn4) and Mixed-Use Neighbourhoods, and tackling High Streets/ Town Centres, Brownfield Sites, Vacant/ Redundant Buildings. The need for Educational Reform is covered in our General Points in our accompanying letter.

Q7: How could the policy help generate better partnership working and wider buy-in from the private and public sectors and communities to the importance of good design?

7.1 perhaps a model process could be developed by the SG
7.2 the idea of possible incentives and disincentives set out in the consultation document is an interesting one, how could this be developed?
7.3 the SG could promote and fund more training events to facilitate interaction between these 3 groups, including discussion of exemplars and how to replicate similar successes. Promoting exemplars of heritage led regeneration projects involving the third sector/ communities could be particularly helpful.
7.4 one means of facilitating interaction and partnership working between these 3 groups is by continued support for BEFS Workshops, as BEFS work covers the interests of all these groups.
7.5 Standards of architecture in the public realm can be significantly improved if planning authorities all had proper urban frameworks and were able to offer accessible urban design advice at the early stages of project commissioning for both public and private sector developments. The best authorities already do this with the support of Architecture and Design Scotland.

Q8: How could the policy help to ensure that public sector investment results in well-designed schools, hospitals and other public buildings and places?

8.1 by introducing a requirement for an independent structured assessment of design quality with a requirement for a minimum score on quality for any tender to be successful.

8.2 The public sector is uniquely placed (as both maker of policy and commissioner of projects) to deliver on this aspect and the starting point must be in the brief for the building or scheme. The requirement for high design standards can be promoted by:

- ◆ Selecting architects and urban designers on the basis of their record for design quality or the prospects for a quality design emerging from their submission rather than fee proposal.
- ◆ Requiring publicly procured projects to be firmly rooted in urban design strategies or frameworks for the areas they are to serve or, in the absence of these, to demonstrate how the proposal has been designed to serve the visual demands of its location rather than just the requirements of its function.

8.3 by the SG, ADAS and perhaps COSLA working to raise client awareness and ambitions over design quality.

8.4 see comment above at 4.5 also, on need for re-use of existing public building programmes.

8.5 by encouraging greater use of design competitions.

Q9: How could the policy help build successful, resilient communities?

9.1 by encouraging community engagement (and see 5.3 above).

There are many examples of the vision and design quality that communities can deliver if given the opportunity and means. Vehicles for this include community architecture projects, which became so successful in the 1980s that many mainstream architects practices have the skills to work with community clients in a meaningful way. The best success will be had by releasing budgetary control for community developments where the communities concerned can show the necessary resilience; they should also have access to proper architectural and development professional help, to develop housing and other projects.

9.2 mixed use, walkable neighbourhoods- as flagged in consultation document- will help

9.3 if it encourages and respects an inclusive process in development, including third party interests, that will help

9.4 a focus on speedy outcomes, rather than good outcomes, has undermined the success of much previous policy.

Q10: How could the policy better promote and celebrate achievement of excellent design?

10.1 by more of a SG PR effort, perhaps involving other key bodies including COSLA.

10.2 the introduction of design issues into mainstream culture is an obvious way forward, and that Government encouragement of this would help.

10.3 One very successful vehicle in the past decade or so has been the promotion of good architectural design in mainstream TV programmes such as Kevin McCloud's *Grand Designs*. This has had a major impact in the public's understanding of the world of architecture including green design and the proper care of historic buildings.

10.4 recognise and reward quality positively.

10.5 empower LA's with recognised skills and resources, to help lift them above the average.

10.6 promote design competitions more including their use for all major public projects.

Q11: How could the policy help capitalise upon links between the quality of design of our best new cultural buildings and public interest in their exhibits?

11.1 The SG, national & regional tourist bodies and Historic Scotland may be able to assist in highlighting such linkages and using them to further promote high quality built environments.

Q12: How could the policy help encourage better public interest in the future of our historic environments?

12.1 by the outreach program of Historic Scotland

12.2 by SG or Historic Scotland grants to local amenity groups to support projects helping this public interest

12.3 by encouraging HS sponsored Conservation Area Regeneration Schemes (CARS) to include this element

12.4 by not presenting the historic environment as a barrier to change, but rather presenting it as part of the context for change.

12.5 by encouraging LA's to promote public interest in the historic environment by recognising its importance, including in heritage led regeneration, in its corporate policies and programmes, eg SOA's and Community Planning Partnership documents, as well as in Supplementary Planning Guidance.

12.6 This is a question that we think should have been posed earlier in the consultation document and might have been better posed the other way round. It seems to the IHBC that with the high value placed by the public on historic environments for living in and visiting, that fostering our historic environment is a key to achieving higher standards of design generally. Where the existing urban fabric places demands on development layout, scale, and proportion (such as Glasgow's Merchant Quarter) exceptionally high environmental outcomes can be achieved with a highly diverse mix of land-uses. The fact is that the two go hand-in-hand and the future of our historic environments is key to producing design frameworks that are uniquely representative of Scotland.