Farrell Review of Architecture and the Built Environment
Call for Evidence Questions

NOTE: You can use this form to draft and save your answers to the Call for Evidence questions as you go along. When you are finished, you can then copy and paste each answer into the relevant answer box on the online form and submit your response.

The online form can be found at www.farrellreview.co.uk "Submit your views"

Introduction

This Call for Evidence is to inform the independent Farrell Review of Architecture and the Built Environment, which relates to England.

As announced at its launch on 25 March, the purpose of the review is to inform the Department for Culture, Media and Sport's approach to its role within government of promoting high standards of design in the built environment. This is so that DCMS can continue to influence and shape policy across government, not least because the public sector is a major client/funder of buildings.

The expert panel headed by Sir Terry Farrell welcomes submissions from any interested parties on the following themes within the scope of this review. Included are some suggested questions to help guide your responses. Please ensure these stay within the four themes as outlined below.

Notes:

- You do not need to respond to all the questions.
- Short and concise responses are requested per question; if they are longer than 1000 words they should include a headline summary.
- The online submission form cannot be saved as you go; you must complete it in one sitting.
- Downloadable PDF and Word versions of the questions are available at www.farrellreview.co.uk
- We suggest you draft your responses in Word and then copy and paste answers into relevant question boxes on the online form.
- Please make clear reference to any existing research or publications relating to your response, and the parts or page numbers within it that are relevant.
- You will be requested to fill out some information about yourself or your organisation at the start of the survey.
- All submissions will be acknowledged.
- All submissions are for the use of this review alone.

• The Review will not publish all responses; however, some responses may be quoted in print or online. By responding to the Call for Evidence you consent to us using your evidence.

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1. Understanding the role for Government in promoting design quality in architecture and the built environment

The review will look at lessons that can be learnt nationally and internationally about the role for Government in promoting and achieving design quality. The role of built environment bodies and other organisations that promote the appreciation and better understanding of design quality in the built environment will also be considered.

1.1 Britain has some of the best architects and designers in the world but that does not automatically mean that standards of architectural design in England are as good as they could be. Why is this?

The Institute of Historic Building Conservation (IHBC) finds it somewhat dispiriting that high quality design is demanded and even revered in so many fields (fashion, automotive, consumer durables, electronics, software, graphics etc.) but viewed in some quarters as a scarcely necessary and unnecessarily expensive add-on in the fields of architecture and urban design. Successive Governments, while nominally supporting high-quality urban design, have tended to resile from allowing local planning authorities (LPAs) the scope to improve quality through the development control system by deregulating supposedly in the interests of economic development.

This is despite the fact that good design has been shown repeatedly to add value to buildings. This is hardly surprising because good design is a time-consuming process; but those who do not understand its value by buying the design process from the lowest bidder effectively drive down the amount of time that will be spent on the design of their building. They pay the price in other ways: higher construction costs, ill-thought-out layouts and wasted space, poorer energy performance, higher-cost maintenance, and, most probably, a significantly lower capital value than that for a well-designed development.

Good design requires:

- a brief which integrates the client's needs with the constraints and opportunities of the site/building, and legislative and regulatory requirements;
- a high quality design which resolves all these factors;
- delivery of the design approach, through all the decisions which have to be made after the design is approved.

Reasons why, too often, good design is not achieved include:

- client failure to engage the right skills: "the English will spare no expense to get something on the cheap" (Bryan Jefferson PPRIBA, we think).
- failure to properly assess the site constraints and opportunities;

- failures by designer and client to get the brief right (notably in preparing schemes for planning permission before thinking through building regulation and other requirements or consulting the LPA informally).

The quality of urban design is not just a matter of design. Quality of construction is also important and this objective has been undermined in recent years by the use of design-only commissions, leaving the quality control in the hands of contract managers who may have a greater interest in programmes rather than quality outcomes. There has also been pressure to reduce the weight of conditions imposed on planning permissions so quality control measures are less common through this mechanism as well.

1.2 How can the "everyday" quality of our housing, public spaces and buildings be significantly improved?

Answer to question 1.2 summary: Regrettable demise of Cabe and the very significant resource in the urban design field that it provided | lack of qualification, aptitude, skill or experience of many working in architectural design | bearing this in mind, the benefits of well-structured design control and design advice through the planning system and the need for improvement and reinforcement of this | loss of expert urban design and conservation staff – and consequent lack of resource – in LPAs and generally | charging for pre-application advice by LPAs inhibits take-up | the benefits of DAS and heritage statements, and the regrettable reduction of the requirements for DAS in cases where it is most required | the usefulness of well-constituted design panels.

Full text: Inevitably the IHBC has to raise the extremely regrettable demise of the Commission for Architecture and the Built Environment (Cabe). The Government's dismantling of Cabe through sudden financial cuts was extremely regrettable and a sorry example of of the blinkered Government thinking on the topic referred to in paragraph 1.1. During its relatively short existence Cabe dealt with the issues being addressed by the Farrell Review comprehensively, backing up its views with research, advice and guidance, and processes for achieving good design in the built environment; and provided a wide range of expert advisers.

One major impediment to improvement is the complete free-for-all in the provision of architectural services. This means that a very large percentage of building work that affects our public domain is designed by people with no formal design training beyond the ability to set out proposals to scale in a drawing.

If (for example) the practice of dentistry was not regulated but the appellation of Dentist were to be the sole statutory aspect of consumer protection, the public would justifiably demand instant change. Yet that is precisely the system we have in the field of architecture. The statutory regulation of the term Architect does very little to promote high quality developments when architectural practice can be conducted de facto by someone with little or no qualification, aptitude, skill or experience.

Design control by LPAs as part of the Development Control system has been the traditional answer to this. In this the LPA judges the quality of the design and not the professional standing of the designer. Some LPAs have a very strong commitment and track record in

dealing with design control well. Typically they are well staffed with urban designers, architects and conservation specialists who contribute to strategic issues as well as day-to-day discussions with developers and their agents at pre- and post-application stages. In smaller LPAs it is the conservation officer, invariably with a dual conservation and design function, who is often the sole source of design advice and expertise. The benefit of this expertise is to negotiate and offer constructive design advice to architects, developers and householders. Such positive design negotiation can overcome delays and stalemates in the application process and avoid refusals and consequent appeals. Many LPA design and conservation officers lend support to the aspirations of architects for better design, specifications and materials, especially where they are engaged by developers who are reluctant to espouse design quality.

Increasingly, because of budget constraints, LPAs planning departments have lost staff, including many of their more senior and experienced planning and conservation officers. Of particular concern to the IHBC is that over a third of conservation posts have been lost since the recession began, and that a significant proportion of them have been senior posts. Remaining staff can lack the experience and confidence to deal with complex conservation and design applications and do not have available to them the mentoring, training and advice that senior staff could once have offered. Of similar concern is that the profession now lacks a career structure which, in the long term, must deter talented individuals from entering the profession.

The loss of staff resources and the loss of experienced staff has undermined the ability of LPAs to help to improve design. Not all planning staff have the specific skills and formal training to vet and negotiate the design quality of planning applications or to offer constructive advice on design improvements, relying on advice from their urban design and conservation officer colleagues. This is the very support that is vulnerable to cuts. Planners do not feel supported by the Government when they try to demand better design quality in applications, particularly in relation to appeals where an application for costs may be made. Many managers of development management teams, have no formal design training and, more importantly, some increasingly lack an appreciation of or give insufficient priority to the importance and public benefits of design quality in development. Consequently, many development management teams are being managed with an emphasis on process and targets at the expense of the quality of design outcomes. While the IHBC supports the need of timely planning decisions, the short term benefit are in danger of causing more lasting harm and public costs to the quality of built environment.

In addition many LPAs now charge for pre-application advice. This can be extremely counter-productive in terms of quality because it means that developers are deterred from seeking advice. This can lead to considerable work being undertaken on poor proposals before there is an opportunity for the LPA to comment. Such proposals are then defended by the developer not because they are good or because there is no alternative but merely because the plans have already been paid for.

The way out of this dilemma was the Design and Access Statement (DAS). The theory behind the DAS was that good urban design could inferred from a coherent DAS in which context, design objectives, alternative approaches etc. would support the design that emanated from the process. A development proposal supported by a sound DAS would be

unlikely to be refused planning permission because the LPA would have no empirical alternative evidence to offer. Unfortunately DASs were never taken seriously by planning applicants or LPAs; but instead of reinforcing their position in the urban design process, the Government effectively abolished them for the majority of projects; in some ways the projects in most need of them. Add to this recent Government demands for speed in decision making which means that LPAs cannot turn away even the most inadequate of submissions and is forced into a decision-making timetable that prohibits serious negotiation on design issues, and you have a sound recipe for mediocrity.

Short of a stricter regulatory regime on the qualifications of applicants for planning permission, as pertains in some countries in Europe, the only way forward would appear to be based on the careful consideration of the design quality of development proposals in the Development Control process. This needs to involve proper contextual analysis and explanation of their proposals from applicants especially where the historic environment is involved and heritage statements are required by paragraph 128 of the NPPF. Design panels are another way in which standards can be helped to improve if they comprise people of appropriate design qualifications and experience. We hope the Review would recommend the promotion and assistance of these.

1.3 Would having a formal architecture policy (as some European countries do) help to achieve improved outcomes? What might be the potential aims of such a policy? What might the benefits be and how they could be measured?

The IHBC thinks this might help. But it would probably not be very effective unless it were to be supported by some sort of body – the IHBC suggest an Institute of the Built Environment (however called) with sufficient scope to ensure non-membership by built environment organizations would make them seem Luddite.

1.4 What can local and national bodies do to promote design quality? What policy infrastructure would assist them in this important task?

It is observable that the structure of the built environment professions – architecture, planning, surveying, engineering, landscape architecture etc. - largely reflects the nature of built environment processes 100 years ago. Two of the most pressing issues before the Farrell Review – urban design and historic environment – are served at least in part by professional structures that span the scope of the older Institutes. A reorganization of the built environment professions into an overarching structure (perhaps analogous with the GMC) within which a greater range of specialisms at varying degrees of qualifications might do something to ensure that design work in the public realm was carried out by appropriately qualified people, and increase the skill levels of those currently carrying out the poorest quality work in design terms.

All the existing professional Institutes have a role in promoting good design and most of them do this to some degree or other. Certainly most, through their members at least, contributed to the work of Cabe. An Institute of the Built Environment with proper buy-ins from the built environment professions, the development industry (which also contributed to Cabe), might be a way forward; but this would need proper commitment going well beyond the support of their own membership's narrow interests and sheer profitability.

Local bodies present something of a problem as well. The demise of the Civic Trust in 2009 was a blow to support for the sorts of local bodies that might have something to offer. Local Civic Trusts have a natural tendency to "small c" conservatism often because they have too-often seen what lack of properly informed design control can do to local environments. They need some form of structure and involvement that helps to give them the confidence to recognize good modern architecture when they see it.

1.5 What other recommendations would you like to make relating to this particular theme?

We have no further comments.

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2. The economic benefits of architecture and design, and maximising the UK's growth potential

The review will consider the contribution of architecture to the UK's economy, how the economic value of good built environment design can be demonstrated, and how it can be maximised in the future.

2.1 In what ways does architecture and built environment design contribute to the UK economy?

Britain is a world leader in the provision of built-environment design services. Sadly, the general standards of urban design at home are not a good showcase for this – they should be. This is not a matter for short-termism. It takes years of solid work and achievement on the ground for perceptible differences to be made in the quality of urban environments as a whole. So if Britain is to remain a world leader it needs to ensure that the direction of travel at home is the correct one. At present this is in doubt.

2.2 It is claimed that high standards of architectural and built environment design add economic value. Can this be demonstrated and, if so, how?

This can easily be demonstrated but it is a bit harder to quantify. It is observable everywhere that better designed urban environments are the more attractive ones to live and work in and to visit. This means that they attract investment and the investment is more likely to retain its value. It also explains why people in already attractive urban environments also tend to be more resistant to change. Only very low value businesses and those in housing disadvantage tend to choose to locate in areas of poor urban environment. This is probably quantifiable but probably not without some coherent form of national structure for analysis within which regional differences can be discriminated.

2.3 What is the commercial value of our historic built environment for the UK brand and for local economies and tourism?

The IHBC offers a similar response to our answer at question 2.2. Heritage is a major tourism draw for the UK and the historic built environment is a major component of this. You only have to look at our best historic towns and cities to see this: Oxford and Cambridge; Canterbury and York; Bath and Harrogate; Durham, Norwich, Chester and Salisbury; Warwick, Ripon, Lincoln, and Ludlow; and a host more (the Historic Towns Forum has plenty of details); not to mention the historic cores of many larger cities.

2.4 How do we ensure the culture of architectural and built environment design excellence is part of a perceived national brand identity that can be exported and how can our expertise (such as place-making and sustainability) be offered to a rapidly urbanising world?

Most, probably all, of the towns and cities mentioned in answer to question 2.3 have had well designed modern buildings and urban landscapes. Too often they have had to struggle to achieve them. Some developers are predatory. The premises policy of too many retailers, for example, revolves around fixed ideas of internal store layout rather than working with the grain of what local premises and circumstances can easily provide. Mixed-use developments, that often make the most appealing urban environments as well as the safest ones, are harder to finance as too many development funders specialize in single building use types. We have said, in answer to Question 2.1, that we need to showcase our skills in the urban environments we create for ourselves. We say more about this in answer to Questions 3.1 and 3.6, in the dealing with local distinctiveness and "green" issues respectively.

2.5 To enhance market leadership in built environment design how can we ensure that the UK is leading and responding to innovations in technology, sustainability and communications in an era of rapid globalisation?

The IHBC does not have much to say on this issue beyond reiterating the point that we are likely to be judged on the quality and inventiveness of our application of emerging technologies to our own towns and cities. On the whole we are not very good at this lagging behind world leaders in most fields.

2.6 What other recommendations would you like to make relating to this particular theme?

We have no further comments.

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3. Cultural heritage and the built environment

The review will look at how to encourage good new architecture whilst retaining the best of the past, and the value of our historic built environment as a cultural asset and in successful place-making.

3.1 How does architecture and the built environment contribute to our society and its identity and how should we evaluate this?

It seems clear that society greatly values its built environments of quality. This can be seen by how people behave (where they choose to live and visit) and what they say about buildings and townscapes that they like and don't like. Local identity is often tied up with local building traditions and vice versa. However evaluation of this is problematic. The IHBC does not believe that urban landscapes can be scored in any meaningful way; certainly not as a method of deciding what weight should be afforded to their conservation against competing interests. This is much better left to the local communities to decide with safeguards. The planning appeal system fulfils this requirement reasonably well with only the contentious cases needing to be examined and then being tested by rigorous analysis by a specialist: the planning appeal system.

Local distinctiveness is usually synonymous with “vernacular”. Vernacular architecture is relevant to our own time. The principles often prescribed to historic vernacular architecture are those which are generally applied, today, to the meaning of sustainability: buildings of simple quality, reusable and adaptable, produced from materials that are freely available and economic to produce and use in construction.

The biggest enemy of the vernacular is the standardization as applied (usually admittedly, as a result of regulation) by the volume house builders. New developments are bedevilled by a host of minimum and maximum standards for areas, widths, heights, splays, intervening spaces and so forth, that impose a visual standardization and poor integration with the rest of a place's townscape that is apparent in the developments of the past 60 years almost everywhere.

In some places there have been valiant attempts to get away from this with the production of Design Guides that show how more imaginative and locally sensitive developments can be achieved within the scope of the standards. Some of these relax the standards themselves in certain circumstances. However, the IHBC is rather against Design Guides on the whole because they can reduce the process to a tick-box exercise that produce conforming but not necessarily good design. Better is the careful justification and consideration of individual proposals.

Local Planning Authorities should be directed to produce district/borough-wide Characterisation Studies based on good urban design and planning principles. These should identify macro and micro area characteristics, areas for improvement and opportunity, infrastructure needs, public realm improvements and areas and buildings of special interest worthy of designation. This evidence base should be at the heart of policies in the Local Plan, drive up design quality in the development process and inform Development Management planning decision-making.

3.2 Do we value heritage, whether historic or recent, evenly throughout the country?

The answer to this is probably not. In the first place heritage environments do not have an even density across the country. While scarcity of heritage assets can mean higher standards of control and conservation, widespread characteristics (e.g. the use of Cotswold stone) can result in strong conservation policy across a wide area. But, secondly, it can be argued that in economically depressed areas heritage is sometimes not at the forefront of

community aspiration when new development is being considered. Analysis of employment of Conservation Officers (or otherwise) by LPAs shows that neither of these characteristics is conclusive on the viewpoint the LPA is likely to take; and this probably reflects community feelings as well.

3.3 How do we make sure that new architecture understands and responds to its cultural and historic context?

Sound methodologies for building in context are already available. They need to be more prevalent in use and should be enforced in practice in sensitive environments such as the setting of listed buildings and in conservation areas as required by paragraph 128 of the NPPF.

3.4 Are there characteristics in older buildings and places that are valued which are lacking in new buildings and places? What should the design of new places learn from the best of the past?

Ancient places have charm whether or not they are well-designed. Charm is an extremely illusory commodity in new development. Pastiche and kitsch are to be avoided everywhere as they will eventually be found unsatisfying no matter how well they appear to be done in the first place. The skill of building in ancient places is to respect scale and massing, and, above all, materials. That is not to say that modern materials are inappropriate, far from it. What is important is that materials which purport to be in keeping should really be so. For example, brick, stone and tile from the same sources as the existing and not some best-we-can-find-and-hope-it's-ok alternative. Ill-considered intrusions of materials that just look wrong in the locality do more to degrade local distinctiveness than anything else. Heritage should be regarded as a benchmark for the quality of future development, and national public institutions (DC-Cabe, EH, HLF, professional institutes) should be publicising strongly examples of how this is done successfully.

3.5 What is the role for new technologies in conservation to enable older buildings to meet modern needs and to be adapted with less impact on their historic features?

There is enormous demand and scope for such new technologies. Old buildings can be extremely adaptable and “green” if handled in the right way. Indeed some recent studies have shown traditional buildings to be more energy efficient than standard theoretical analysis give them credit for. Unfortunately buildings of traditional construction are too often compromised by being treated to standard building industry techniques – chemical damp-proofing, sealants and membranes, cementitious mortars and renders, gypsum plasters, and so forth. The one-size-fits-all approach of the Green Deal concerns us greatly. We fear that a considerable proportion of the nation's stock of traditionally constructed buildings could be compromised in structure and performance by inexpertly applied Green Deal techniques in coming years; which would be a pity as there are perfectly sound ways of achieving satisfactory improvements in thermal performance. The easy concept of “solid wall = breathable = traditional materials and treatments” ought to be simple enough to build into refurbishment training and practice.

3.6 What other recommendations would you like to make relating to this particular theme?

Much is made in modern architecture and building of climate change issues: reductions in the use of energy and greenhouse gas emissions. Yet almost all the regulation and practice in this field relates to energy-saving and greenhouse gas reduction in use. Little attention is paid to two aspects that should form part of the analysis in every case: the embodied energy of any building being replaced and the energy requirements relating to the procurement of the new building, its construction, materials and components, many of which have high energy consumption in their manufacture, transport and installation.

Whole-life energy analysis is a reasonably well established discipline but is used all too infrequently. It should be used to inform the developer (for himself and as a proxy for the end-user of the building) of the optimum energy strategy to be adopted, and this should be actively promoted by Government. The IHBC believes that many "green" developments would be found to be far less so by the adoption of this technique and would provide support for the careful reuse of older buildings in many cases, often with fewer design and townscape impacts.

There is far too little collaboration in urban design. LPAs should have multi-disciplinary urban design teams able to assist developers make appropriate proposals within the scope of urban development strategies, at the earliest design stages when such assistance can be most beneficial.

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4. Promoting education, outreach and skills

The review will consider the potential contributions of built environment education to a broad and balanced education both as a cultural subject in its own right and as a way of teaching other subjects. Public outreach and skilling-up will also be considered.

4.1 What is the potential contribution of built environment education at primary and secondary school level, both as a cultural subject in its own right and as a way of teaching STEM (science, technology, engineering and maths) and other subjects?

There have been many examples in the past of efforts to broaden the scope of eduction in schools by using "environmental education" as a medium for studies in routine school subjects such as maths, science, English and art. We do not wish to enlarge on this beyond observing that recent proposals which will have the effect of narrowing school curricula do not appear to be a step in the right direction.

4.2 What is the role of architecture and the built environment in enabling a better public understanding of issues related to sustainability and the environment?

It is arguable that Kevin McCloud has done more than anyone else to promote a good public appreciation of design in the built environment through his Channel 4 series *Grand Designs.* His critical examination of proposals, seeking rationality in design decisions, promoting

proper collaboration between clients and professionals, and championing both sustainability and historically appropriate techniques have been a better public showcase of "how to do good design" than anything produced by the professions. Following the success of *Grand Designs,* the genre has been paralleled in other television programmes and series and there is thus more public appreciation of design and heritage issues than there was 10 years ago. The built environment professions should use such vehicles to promote good practice in their disciplines (without introducing the dead hand of narrow professional interests and a lack of human interest).

4.3 How can high standards of design be achieved and promoted through neighbourhood plans?

Those preparing neighbourhood plans are probably going to have high design aspirations. Neighbourhood Plans involve a time-consuming process of some complexity and are unlikely to be attempted by the uncommitted. However the ready availability sound advice (a well-designed web based information and advice system would be ideal) would be likely to be a good start. A mentoring system like the Cabe "Enabler" programme would also be helpful.

4.4 How can we better ensure that awareness and support of high standards of design are shared among all the professions concerned with architecture, the built environment, and quality places?

The IHBC thinks that awareness of the need for high standards is already well established in the built environment professions. Where it is not is amongst the poorer elements of the scarcely qualified part of the designer offer, DIYers and the building systems and products manufacturers who supply direct to the public. There also may be a problem for individual professionals when employed by clients with small aspirations and budgets in the need to retain work in these straitened times. There needs to be, therefore, a 4-pronged approach: more rigorous rejection of poor designs by LPAs, a renewed commitment to the reasoned justification of their designs by those who submit planning applications affecting the public realm, the reinforcement of design advice (a well-designed web based information and advice system would be ideal) and urban design courses aimed specifically at those with less than professional qualifications pitched at a level that suits their likely needs as a designer.

4.5 How can we ensure fair representation (gender, ethnicity, class, etc) and better preparation for those wishing to enter into higher education and the built environment professions?

Degree courses leading to professional qualification in built environment professions typically have specific entry requirements that involve the right curriculum choices as early as the age of 13-14 (e.g. mathematics). It is crucial, therefore, that career aspirations amongst under-represented groups, be fostered and steered before that age. This is why general environmental education is so important.

4.6 What other recommendations would you like to make relating to this particular theme?

In recent years there has been a reduction in the numbers of university courses in architecture, planning and urban design. It seems that, sometimes at least, this has more to do with the relatively high cost of providing such courses rather than the demand for them. Maintenance of a vibrant offer of tertiary education in the built environment professions is a vital component of the nation's offer on the world stage. There needs to be an expansion of university courses and modules in urban design and heritage.

Please **submit your responses via the online form** that can be found at: www.farrellreview.co.uk . We regret that emailed attachments of this document will not be considered as evidence.

Please respond by **5pm, Friday 19th July 2013** (six weeks from the opening of the call). Replies after that time may not be taken into consideration.