

Response to Stewardship and Responsibility – A Policy Framework for Private Housing in Scotland

I respond as follows on behalf of the Royal Incorporation of Architects in Scotland.

The Royal Incorporation of Architects in Scotland (RIAS) is the professional body for Chartered Architects in Scotland. It has charitable status and offers a wide range of services and products for architects, students of architecture, construction industry professionals and all those with an interest in the built environment and the design process.

1.00 Quality Standards for Private Housing in the 21st Century-

However, the RIAS has concerns. The Standards identified in the report are broadly acceptable and very necessary in order to make statistical assessment of the current situation against previous standards. For future performance, the key issues are

- the standards existing in that substantial proportion of the housing stock which is only marginally above the minimum standards; and
- the funding of future improvements.

Who is to say what are the minimum standards? Where is funding for improvements to come from? Who is going to step in and ensure that continuing improvements are made – the householders, the owners, or the public purse?

It is evident that current government policy is directed to replacement rather than repair. The RIAS accepts this as being appropriate in the circumstances but feels that the policy of “replacing” or “repairing” should be clear in both public and private sectors. The RIAS foresees a looming requirement for improvement of a substantial proportion of the housing stock, both privately and publicly owned, where the property is at or near the lowest standards.

There should be mechanisms applicable across all sectors for assessing the position. The RIAS suggests engaging with parties such as Communities Scotland, Homes for Scotland and Local Authorities in a joint effort. The private sector, left to its own devices, is unlikely to take an overall view and will naturally concentrate in its own priorities. At the middle and upper end of the market the private sector may present little problem but at the margins of economic viability the public purse may well have to be resorted to.

2.0 Managing the Situation

Management of the existing privately owned stock is essential. The RIAS is critical of the terms of the provisions of currently typical ownership title deeds in this respect. Essentially, owners seek to minimise their commitment to communal facilities and maintenance.

The following should be addressed for the joint benefit of all -

- The complexities of joint ownership of the building fabric and services (applies especially to flats)
- The environment and locality
- Facilities and services
- Accessibility
- Energy Consumption/Sustainability

The RIAS is strongly of the opinion that leaving the setting up of appropriate mechanisms to the legal profession when compiling title deeds, or to the property management profession who tend to take a retrospective management stance, or to the short term sales perceptions of the mass house builders is not sufficient.

The RIAS would like to see “model” forms of title that include common arrangements for subsequent management of shared interest. This, we think, would result in a considerable benefit to individual householders and the community as a whole e.g. the mechanisms in the Tenement Bill should be expanded to all residential properties. These features need, of course, “teeth and clout”.

The RIAS suggests an immediate priority to get pilot projects moving that have geographical spread over the range of urban, suburban and rural property so that lessons can quickly be learned and assimilated.

The RIAS recognises that the potential to provide a support network of expertise has never been higher in terms of RSLs, Local Authority and indeed consultants working in the commercial sector. This expertise needs to be harnessed for the benefit of the private sector.

However, the RIAS sees the need to focus and channel these capabilities. A “guardian” is needed at local level to direct things. Perhaps this is a role that should reside in advisors to Local Authority Planning Departments, Community Councils and Residents Associations. The RIAS feels that it is appropriate to think in terms of locality in dealing with these matters. Professional consultants, architects included, are more than willing and able to contribute. Perhaps this is a matter that can be taken forward under the Community Planning banner?

The RIAS has considerable concerns that local government reorganisation has led to a dearth of professionals who have appropriate understanding of design management and procurement skills i.e. those whose task is to oversee and guide how the community makes best use of its resources for the public good.

The RIAS has concerns that the report is not forward looking in terms of improving the built environment. The emphasis is on achieving minimum standards. Given that the life cycle of housing is generally long, government should be adopting much more ambitious targets in for example, space standards, energy/CO₂ performance, transport facilities, public open space and the like. We think that a forward-looking assessment of needs and aspirations should be made. Do we not need a group of rehabilitation energy advisors for instance?

The RIAS recognises that the scale of the problems is considerable. This is all the more reason to approach the problems with vision rather than pander to the politically correct agenda of setting low targets so as not to be seen to have failed in the future.

3.00 How to start things off?

The RIAS sees architects as having a body of valuable knowledge in this respect.

The RIAS suggests that past experience can be drawn on. Much tenement and public sector rehabilitation has been done since the mid seventies but no one could say that the task has been completed.

At the same time, it has to be recognised that the housing stock is slowly but surely ageing. This applies across both public and private sector. What could and should be done? Are we in an era of “disposable” housing i.e. after 40 years demolish and rebuild as a matter of course?

Minimum standards tend to concentrate on the poorest quality stock. What about the middle ranking run of the mill property? Will that prove adequate for the needs of the 21st Century? Perhaps considerable stock will have to be written off. Is the quality of recent and current construction such that ‘Assessments of Obsolescence and Sustainability’ need to be made? Professional advisors agree, for instance, that the products of the 60s present very little scope for upgrading due to the minimal space dimensional standards prevalent at that time. These issues need to be actively assessed. The architectural profession has these skills.

4.00 Resourcing

The RIAS sees no easy answer to what is essentially a political decision as to whether to allocate public funds. Whether the private sector has the will and the ability to regenerate the housing stock is unclear. Undoubtedly, successive governments have attempted to move “housing” into the private sector but the question remains – if private tenants and landlords are not able to upgrade the existing stock, will the government step in? What are the implications for the housing legacy in 50 years’ time? Are the current allocations of funds available for Housing Improvement Grants sufficient? Who is assessing that?

5.00 Associated Facilities

The RIAS is concerned that the commercial housing market is not creating whole communities, complete with associated facilities of shops, schools, residential, community facilities and employment prospects. It is important that housing does not exist in isolation or as a simple number crunching exercise. Will, for instance, restrictions in car use, advocated by the energy lobby, profoundly influence the development of our towns and cities by forcing a return to higher densities and mixed use development?

6.00 Summary

Architects have the skills to bring added value to the projects by producing creative solutions. We recommend that the government find ways of harnessing that at community level. Commissioning some pilot projects would be a start.

DIRECTOR OF PRACTICE