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**From:** Cristina Gonzalez-Longo [Cristina.Gonzalez-Longo@ads.org.uk]  
**Sent:** 25 January 2008 16:23  
**To:** Housing Consultation 2007  
**Cc:** Sebastian Tombs; Jill Leckie  
**Subject:** A+DS's Response to Firm Foundations

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Dear Sir/Madam,

Please find attached completed Respondent Information Form and Architecture and Design Scotland's response to the discussion document "Firm Foundations: The Future of Housing in Scotland", which has been also sent by post today.

Kind regards,

Cristina

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## RESPONDENT INFORMATION FORM

### FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND

Please complete the details below and return it with your response to the above address. This will help ensure we handle your response appropriately. Thank you for your help.

Name: ARCHITECTURE AND DESIGN SCOTLAND

Postal Address: BAKEHOUSE CLOSE  
146 CANONGATE  
EDINBURGH EH8 8DD

1. Are you responding: (please tick one box)

(a) as an individual  go to Q2a/b and then Q4

(b) on behalf of a group/organisation  go to Q3 and then Q4

### INDIVIDUALS

2a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government website)?

Yes  (go to 2b below)

No, not at all  We will treat your response as confidential

2b. Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

Yes, make my response and name available, but not my address

**ON BEHALF OF GROUPS OR ORGANISATIONS:**

3. The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Government website). Are you also content for your response to be made available?

Yes  No  We will treat your response as confidential

**SHARING RESPONSES/FUTURE ENGAGEMENT**

4. 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 the Scottish Government to contact you again in the future in relation to this consultation response?

Yes  No

## QUESTIONNAIRE

### FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND

Should you have any comments on any other aspects of this consultation document, or require additional space for your responses, please return this to us on a separate piece of paper with your name and organisation at the top.

Questions	Your responses
<p><b>Question 1:</b> Do you agree that aiming to increase the rate of new housing supply in Scotland to at least 35,000 a year by the middle of the next decade is a sensible and realistic ambition, and that this will help set a necessary political context for acceleration in housing supply?</p>	<p>PLEASE REFER TO A+DS'S RESPONSE ITEMS 3.2 - 3.8</p>
<p><b>Question 2:</b> Do you agree that, to give practical effect to the ambition, local authorities should co-operate regionally in setting realistic housing targets for housing market areas, and in enabling the delivery of these targets? If so, what arrangements should be put in place to support and provide incentives for such co-operation between relevant local authorities?</p>	<p>PLEASE REFER TO A+DS'S RESPONSE ITEMS 3.10 - 3.11</p>
<p><b>Question 3:</b> Is there a role for a specialist national function to provide expert support for local authorities in strategic planning for housing? What expertise do you think this function would require?</p>	<p>PLEASE REFER TO A+DS'S RESPONSE ITEMS 3.13 - 3.18</p>
<p><b>Question 4:</b> Even when land has planning permission there are still blockages that prevent new housing being built. What additional arrangements would, or could, accelerate development on land with planning permissions to help ensure that future housing supply targets are met?</p>	<p>PLEASE REFER TO A+DS'S RESPONSE ITEMS 3.20 - 3.22</p>
<p><b>Question 5:</b> We have proposed that much expanded or new, stand-alone settlements may be a valid solution. How should we best encourage the development of new, sustainable communities that are sympathetic to Scotland's landscape and environment?</p>	<p>PLEASE REFER TO A+DS'S RESPONSE ITEMS 3.24 - 3.33</p>
<p><b>Question 6:</b> How should different types of assistance within the LIFT be targeted?</p>	<p>-</p>

Questions	Your responses
<p><b>Question 7:</b> How could the Government stimulate more innovative mortgage and related products and services to assist people in purchasing their first home?</p>	—
<p><b>Question 8:</b> Should the Government provide direct cash grants to first-time buyers?</p>	—
<p><b>Question 9:</b> How can the private house-building sector play a bigger role in providing, without public subsidy, increased provision of affordable starter homes?</p>	—
<p><b>Question 10:</b> What issues do you consider should be taken into account when considering the increased use of private sector lets to house low-income and homeless households?</p>	—
<p><b>Question 11:</b> How should we ensure an appropriate balance between safeguarding tenants' rights and encouraging the private rented sector to achieve its full potential in Scotland's overall housing market?</p>	—
<p><b>Question 12:</b> Do you think there is sufficient engagement between the public sector and private landlords? If not, what else should national and local government be doing?</p>	—
<p><b>Question 13:</b> What other options should we consider for increasing the supply of private rented housing for low income and homeless households?</p>	—
<p><b>Question 14:</b> How could more private landlords be encouraged to let to tenants on benefits and homeless households?</p>	—
<p><b>Question 15:</b> What other schemes or incentives might help us to recycle empty properties more effectively?</p>	—

Questions	Your responses
<p><b>Question 16:</b> Do you agree that we should exempt new build social housing from the Right to Buy?</p>	<p>—</p>
<p><b>Question 17:</b> Do you agree that we should subsidise local authorities in areas of need to use their prudential borrowing capacity to build new council houses?</p>	<p>—</p>
<p><b>Question 18:</b> Do you agree that we should introduce large scale competitions for subsidy?</p>	<p>PLEASE REFER TO A+DS'S RESPONSE ITEMS 6.4 - 6.7</p>
<p><b>Question 19:</b> If not, how would you ensure that public subsidy is used to build as many good quality RSL houses as possible?</p>	<p>PLEASE, REFER TO A+DS RESPONSE ITEMS 6.9 - 6.11</p>
<p><b>Question 20:</b> Do you agree that we should subsidise the development of houses for mid-market rent?</p>	<p>—</p>
<p><b>Question 21:</b> If so, should the subsidy be awarded as part of the competitive regime for awarding HAG that we are proposing?</p>	<p>—</p>
<p><b>Question 22:</b> If not, how would you increase variety in social housing?</p>	<p>—</p>
<p><b>Question 23:</b> Do you agree that we should encourage landlords to look at means of adjusting the mix of their stock in the interests of achieving more sustainable mixed communities?</p>	<p>—</p>
<p><b>Question 24:</b> Do you think that subsidies for development should be provided to bodies other than registered social landlords?</p>	<p>—</p>

Questions	Your responses
<p><b>Question 25:</b> What sorts of protections should be offered to tenants in these circumstances?</p>	-
<p><b>Question 26:</b> Do you think that the Scottish Government should vary Right to Buy discounts by (a) locality and/or (b) type of property?</p>	-
<p><b>Question 27:</b> Do you agree that ALMOs can provide a satisfactory alternative to stock transfers?</p>	-
<p><b>Question 28:</b> Do you think that additional help from Government to enable landlords to meet the SHQS should be linked to improvements in a landlord's performance?</p>	-
<p><b>Question 29:</b> If so, what measures do you think would be beneficial? If not, why not?</p>	-
<p><b>Question 30:</b> Do you agree that we need to find new ways of focussing on the quality of place/open space and greenspace within deprived neighbourhoods?</p>	PLEASE REFER TO A+DS'S RESPONSE ITEMS 6.13 - 6.20
<p><b>Question 31:</b> Do you have suggestions for approaches that are not resource intensive and that include stakeholders?</p>	PLEASE REFER TO A+DS'S RESPONSE ITEMS 6.22 - 6.25
<p><b>Question 32:</b> Do you agree that the lead role (and recipient of any resources) to undertake this work should be open to a range of stakeholders?</p>	PLEASE REFER TO A+DS'S RESPONSE ITEMS 6.27 - 6.28
<p><b>Question 33:</b> Do you agree with the features and principles we have set out here for a modernised regulation framework?</p>	
<p><b>Question 34:</b> How would you like social housing regulation to be organised? (For example, should it be a separate organisation or part of a group of other regulators?)</p>	

A+DS'S RESPONSE TO THE SCOTTISH GOVERNMENT'S DISCUSSION DOCUMENT  
**"FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND"**  
25 January 2008

## EXECUTIVE SUMMARY

We welcome the call in this discussion paper for housing development to focus on delivering quality places. Our key points are:

- Urban design and placemaking should be embedded at the heart of all housing development
- The quality of spaces between buildings, the public realm, is a vital component of the quality of place, and therefore the quality of life – particularly in deprived neighbourhoods.
- Roads design standards should be revised as a matter of urgency, to assist the development of safer more enjoyable streets and places in housing areas.
- Spatial masterplans can play a vital role, ensuring sensitive integration with and connecting to existing communities, creating places of enduring quality that respect local character.
- Environmental performance of housing layouts as well as individual units must inform decision making; the design quality of the houses and places proposed to be built in the next 10-15 years is of fundamental importance to Scotland's future sustainability.
- To ensure delivery, processes need to be put in place to ensure that core placemaking values are retained from inception to implementation, and inform long-term maintenance.
- Good practice examples can demonstrate that radical change is not only possible but that it can lead to better places and better lives. This kind of public inspiration is essential for decision makers who are seeking a strong public mandate to back up tough decisions and motivate changes in behaviour.
- It is essential that Local Authorities work together on a regional basis, to best plan the location, size and nature of new housing development.
- Local Authorities have key leadership roles through the strategic approach to land release, through the development plan process, and also through supplementary planning guidance documents which can lead to much improved housing development.
- This consultation, together with SPP3, Planning for Housing, and the National Planning Framework 2008, presents an important opportunity to plan for housing in an integrated and effective way: avoiding past mistakes, creating thriving communities. This will not be achieved by working to lowest cost denominators.

## 1 INTRODUCTION

- 1.1 Architecture and Design Scotland (A+DS) is Scotland's national champion for good architecture, design and planning in the built environment. It was established by the Scottish Government in April 2005. Architecture and Design Scotland is a Non Departmental Public Body (NDPB) which acts as a key delivery mechanism for the objectives of the Scottish Government's Policy on Architecture for Scotland. Our main aim is to inspire better quality in design and architecture in the public and private sectors to ensure that Scotland's built environment contributes in a positive way to our quality of life and our built heritage.
- 1.2 A+DS supports the Scottish Government's aim to create a housing policy that meets Scotland's communities' needs for good quality, energy efficient homes that people can afford. In particular, we welcome the call in this discussion paper for housing development to focus on delivering quality 'places'. This is essential if the investment is to have lasting value, and avoid the 'could be anywhere' housing of recent years. New housing in Scotland that consistently contributes to an increased quality of life, on a par with that enjoyed by our northern European neighbours, should be the objective.
- 1.3 Scotland's historic built environment is internationally recognised as of great quality and character, and Scotland should maintain a level of aspiration founded upon this heritage. Many lessons have been learnt during the 20<sup>th</sup> Century about the wisest ways of approaching housing renewal, regeneration, and new building, much of it painful and expensive in human, as well as in financial and environmental terms: the exemplar urban design of the Crown Street neighbourhood in the New Gorbals is perhaps the best known case. In this instance, place making was a core part of the ultimate brief for the masterplanning stage, and has been successfully delivered. It is essential that these place making lessons are applied more actively across Scotland in future.
- 1.4 At a national policy level, recognition of the key importance of good urban design has been evident since 2001 in *Designing Places*, which has been supported by a useful series of Planning Advice Notes (PANS) on housing and related matters. Despite this, urban design and place making is not yet embedded at the heart of most housing developments, especially in the speculative volume sector. If communities are to be connected and sustainable this must be addressed through the Planning and Development process.
- 1.5 Local authorities have key roles, both through the Development Plan process and also through Supplementary Planning Guidance documents. Where well crafted and drafted, these can lead to much improved housing development, and can provide strong support for development control decisions if challenged at appeal. Local authorities also have a role to play in setting the level of ambition for their communities – a vital leadership function which can influence deeply the physical quality of places throughout the authority area, including housing of all types.
- 1.6 As set out in Chapter Two of the consultative document, a key principle of place making is a recognition of the site, and all its contexts and constraints – i.e. cultural and historic, geological and geographic, topographical and climatic – so that the place that results from development has characteristics appropriate to the landscape, the local environment, settlement patterns and so on. These are what create particular places with special qualities

and provide identity as a consequence. Scotland is a wonderfully diverse place with many types of place already; we should not be afraid to create new places that enhance our country in a variety of ways – and will form a legacy of which we will be proud. This will not be achieved by working to lowest cost denominators: a look back to those places which we now value highly shows that it is a false economy to aim low.

- 1.7 In summary, A+DS welcomes the Government's strategic consideration of housing and reinforces that good quality housing, forming attractive places to live and work in, is vital for creating sustainable communities. A high quality built environment is an essential ingredient in creating a smarter, fairer, wealthier, safer, stronger and greener Scotland.
- 1.8 This discussion paper, together with the recently issued *National Planning Framework 2008* discussion draft and the *Scottish Planning Policy SPP3: Planning for Housing* consultative draft, present an important opportunity to plan for housing in Scotland in an integrated and effective way; an opportunity to avoid the mistakes of the past and ensure that housing investment creates new thriving places.
- 1.9 Our comments in this paper are not tenure specific, except where identified as such.

## **2 CHAPTER ONE**

### **THE CHALLENGE OF HOUSING SUPPLY - COMMENTS**

- 2.1 Recent changes in the housing market across Scotland are impacting on the pace of new housing development. In too many cases, this is not enhancing the quality of our cities, towns and villages. At present there are 25,000 new houses built in Scotland per year. *Firm Foundations* proposes a substantial increase in new house building to provide 35,000 new homes per annum by 2015. If this increase in new housing is not to blight our towns and settlements it must be spatially planned with care. New development should be sensitively integrated and connected to existing communities and take account of local and specific character and extant successful development patterns.
- 2.2 The design quality of the houses and places proposed to be built over the next 10-15 years is of fundamental importance to Scotland's future sustainability. We must learn from the errors of the past, as we cannot afford to demolish and re-build as we have done in many post war housing schemes over recent decades, in which the low quality of the environment and spaces created around buildings and the lack of maintenance have made them unattractive and unsustainable places to live. From the perspective of creating successful places through housing development, A+DS stands ready to contribute to meeting these challenges – advising on how best to enable and procure new high quality homes and residential areas.
- 2.3 The excellent work being carried out by the Housing Supply Task Force is acknowledged.



### 3 **CHAPTER TWO** **PRIORITIES FOR ACTION ON HOUSING SUPPLY**

- 3.1 *Question 1: Do you agree that aiming to increase the rate of new housing supply in Scotland to at least 35,000 a year by the middle of the next decade is a sensible and realistic ambition, and that this will help set a necessary political context for acceleration in housing supply?*
- 3.2 **Any plan to increase output must be managed to ensure high quality places, and high quality of life for communities**, demonstrating the characteristics of successful places as set out in ‘Designing Places: A Policy Statement for Scotland’, and supported by national Planning Advice Notes (PANs).
- 3.3 We fully endorse the introductory remarks in Chapter Two that stress the nature and importance of good design; and the characteristics of sustainable places – the integration of land use to provide opportunities for a range of work and lifestyle choices; mixed tenure and house types; walkable neighbourhoods with well integrated and well managed open space and urban realm. These objectives have consequences for density patterns, and the ways in which the car is handled.
- 3.4 As noted in our introduction, we agree that the starting point for this approach is an understanding of context and place. We endorse the desire to see the creation of the conservation areas of tomorrow, places of enduring quality which should respect (rather than necessarily reflect) local traditions in their design and layout, while embracing not only the challenge of higher energy efficiency, but wider sustainability targets – such as waste and pollution diminution.
- 3.5 To achieve these objectives, we support the preparation of long term settlement strategies, which have as a fundamental elements, care in location choices and urban design and layout considerations. The determination to avoid the mistakes of the past is welcome.
- 3.6 **Substantial output increases will require a properly co-ordinated delivery programme to ensure that built quality is not jeopardised.** We note that the construction industry in Scotland is already ‘over heated’ and recently has begun to rely on EU labour to make up for short falls in labour and skills; and that the target timescale is concurrent with projected increases in public sector building programmes in Health, Education and Regeneration and the delivery of the Olympic and Commonwealth Games.
- 3.7 For the target to be realistic, carefully co-ordinated investment will be required in research and development, and in the training of skilled construction and development personnel. If not in place, the proposed increase in housing supply will stretch the industry and consequently there will be higher risks that the housing provided will be not be of the required built quality, and not achieve vital improvements in environmental performance.
- 3.8 The higher energy standards set out in the recently issued report of a panel appointed by Scottish Ministers: *A Low Carbon Building Standards Strategy for Scotland (2007)*, to which A+DS contributed will, when implemented, place increasing pressure on the capacity and skills of the industry. Alongside other pressures, the challenges of producing low carbon developments call for robust strategies to ensure that the quality is achieved in the design of new housing developments and the reuse of existing ones.



- 3.9 *Question 2: Do you agree that, to give practical effect to the ambition, local authorities should co-operate regionally in setting realistic housing targets for housing market areas, and in enabling the delivery of these targets? If so, what arrangements should be put in place to support and provide incentives for such co-operation between relevant local authorities?*
- 3.10 It is essential that Local Authorities work together on a regional basis, to best plan the location, size and nature of new housing development.
- 3.11 Ultimately, **the quality of the places created is as important as the focus on numbers of dwellings**. It will be important to set ambitious criteria for place making at the outset, and monitor its delivery throughout all stages of the process, if the natural inclination of local and national authorities to focus on the numbers alone is to be managed effectively. This quality audit work could best be undertaken independently.
- 3.12 *Question 3: Is there a role for a specialist national function to provide expert support for local authorities in strategic planning for housing? What expertise do you think this function would require?*
- 3.13 **There is a role for a national function to provide expert support for local authorities in strategic planning for housing**. Strategic planning is not only about analysis of demand and the organisation of supply, but also about the quality of place that is to be an outcome of the development process. We would expect the national role to include support in aspects such as masterplanning, development frameworks, design statements, and infrastructure.
- 3.14 A+DS would welcome the opportunity to discuss this role further with Ministers.
- 3.15 Housing is a major contributor to Scotland's environmental impact. All new housing should be laid out to improve its collective environmental performance, starting with using passive methodologies (orientation, form, materials, etc). We support the proposals in the report *A Low Carbon Building Standards Strategy for Scotland*, which sets out a forward plan for implementing improvements in individual building performance. Designers need to be encouraged to be innovative and to design and build not only to current but also to future standards.
- 3.16 In addition to improving performance at the level of individual housing units, best practice in masterplanning and place making is the most effective way of delivering the objectives of Government through the mechanisms of both planning and building standards.
- 3.17 Better integration of housing and related strategies at the local and national level, in particular infrastructure such as transport and energy, water and drainage at a regional level, could also be addressed through such a national function. Strengthened integration of this kind becomes more critical if the intention is to create stand-alone settlements of potential regional significance.
- 3.18 The discussion paper calls for a renaissance of council house building and for planning policies to be grounded in good understanding of housing markets, which in some cases will

require working across local authority boundaries. This reinforces the case for a national function in such matters.

- 3.19 Question 4:** *Even when land has planning permission there are still blockages that prevent new housing being built. What additional arrangements would, or could, accelerate development on land with planning permissions to help ensure that future housing supply targets are met?*
- 3.20 Infrastructure-related issues, such as water and drainage capacity, are often cited as reasons for delay. Greater collaboration between Local Authorities and Utilities companies at a strategic level should assist in preventing such blockages in the future.
- 3.21 **Local Authorities should take a leadership role in promoting masterplanning, local design frameworks and land assembly.** These should be integrated into local development plans, with sustainability and high quality at the top of the agenda. The provision of quality places can from time to time require the use of CPO powers by local authorities and others – such as the URCs - to facilitate land assembly for critical sites. While this can prove time consuming, the long-lasting results can often justify this approach.
- 3.22 As Homes for Scotland has recently noted in its response to *OFT - Market Study into House Building*, more emphasis needs to be placed on design-led masterplans. We are aware that some authorities are promoting streamlining of planning consents based on developer compliance with agreed Masterplans and Development Frameworks. Such mechanisms can ease the flow of approvals and overcome barriers through careful forward planning.
- 3.23 Question 5:** *We have proposed that much expanded or new, stand-alone settlements may be a valid solution. How should we best encourage the development of new, sustainable communities that are sympathetic to Scotland's landscape and environment?*
- 3.24 We support the criteria shown in relation to the Scottish Sustainable Communities Initiative, which also reflect the 'Designing Places' principles.
- 3.25 **Strategic urban design, masterplanning and the management of buildings, spaces and places are essential parts of any sustainable development or climate change strategy.** A holistic approach is required which goes beyond measurement and calculations to consider the quality of places.
- 3.26 Reducing carbon emissions is not just about the design and management of individual buildings and changing individual behaviour but about planning and designing for sustainability at the scale of neighbourhoods, cities and regions (from CABI: *Sustainable design, climate change and the built environment*, 2007).
- 3.27 To date A+DS has seen too few proposals for stand-alone settlements to be able to draw firm conclusions about the appropriate processes and policies to deliver schemes which could be described as places designed for sustainability.
- 3.28 However, we welcome the lead, and the challenge set out in the consultation. Research shows that *people believe that government should take the lead in combating climate*



*change and use the regulatory framework to support behaviour change (Ipsos MORI Climate change survey, 2007). As CABE has already published: 'People agree that government has a mandate and a responsibility to do so. There is a huge opportunity for government and the public sector to lead by example. Government has three tools: regulation; fiscal incentives; and procurement. Any action by the public service needs to be matched by, and done in partnership with, business and the public' (from Sustainable design, climate change and the built environment, 2007).*

- 3.29 To take such initiatives forward will require a boldness of leadership on both public and business sectors, and recognition that it will almost always cost more upfront to achieve higher sustainability standards. Such expenditure should be assessed on the basis of whole-life costs and benefits and the opportunities of scale over longer time periods.
- 3.30 Concerning place making in new settlements, allocating land through a capacity study method may not be the most effective way of ensuring better quality. Non allocation of sites could create a level playing field and allow sites to be judged on the basis of the integrity and appropriateness of the specific design proposals. Alternatives to current practices of land purchase and options, usually made on the basis of density calculations and standard layouts need to be explored if the creation of the best possible developments and places is to be delivered.
- 3.31 One approach to progressing such projects, might be for Scotland's most creative minds and forward-thinking designers to be brought together to visualise scenarios for low carbon, sustainable settlement patterns. Good practice examples can demonstrate that radical change is not only possible but that it can lead to better places and better lives. This kind of public inspiration is essential for decision makers who are seeking a strong public mandate to back up tough decisions and motivate changes in behaviour.
- 3.32 There are a growing number of examples in development across different parts of the globe, from which Scotland could learn. Any investment in such approaches would warrant thorough research, as well as willingness to pilot studies, and practical experiment. Such a creative and important impulse in Scotland would be welcomed.
- 3.33 Offering incentives to Housebuilders and developers to participate in developing exemplars or demonstration projects is a potential way to raise standards. Local Authorities could promote land in their ownership or developers could bring forward appropriate sites for consideration.

#### **4 CHAPTER THREE ASSISTANCE FOR FIRST TIME BUYERS**

- 4.1 The provision of affordable homes by developers without subsidy should be carefully considered in the context of the parallel demands for increased infrastructure associated with new housing development (including schools and other facilities), the desire for good quality design of the homes themselves, and in the public realm and associated greenspaces created. To date the private sector has generally found it difficult to provide the quality of public realm and infrastructure which is clearly needed for sustainable new communities.



4.2 The consequences of adopting such an approach should therefore be tested.

## 5 **CHAPTER FOUR** **THE PRIVATE RENTED SECTOR**

- 5.1 The reuse of existing stock is a component of sustainable development, as is proposed. Action of this kind should aim to maximise the environmental performance of such stock, not only to tackle climate change and reducing energy demand, but for the important social advantages of tackling fuel poverty.
- 5.2 Opportunities to reuse not only existing housing, but also other suitable existing buildings for conversion into housing should be considered. Providing incentives to owners to upgrade properties to higher environmental standards, perhaps on condition of making them available to local people at affordable rents, could also be worth considering.

## 6 **CHAPTER SIX** **STIMULATING INNOVATION AND CHOICE IN SOCIAL HOUSING**

- 6.1 A+DS actively encourages innovation, but it is concerned that the discussion paper is proposing a route of developers' and contractors' frameworks, with the idea of small number of developers acquiring the specialist skills in design, procurement, funding and land acquisition necessary to deliver large programmes. Research needs to be carried out to establish if the current industry is capable of coping with this task and the adequacy of this approach. Any design, of course, needs to be carried out by a competent design team, including architects, and needs to be site specific in support of the objective of place making.
- 6.2 Since the 1970s most Local Authorities in Scotland have ceased to carry in-house staff with the skills to develop new housing. By contrast RSLs have trained staff and developed the necessary skills. The recent experience of the Glasgow Housing Association in striving to deliver its targets for new housing development illustrates the result of under-estimating the need for experienced staff with development and resident consultation skills. The proposal that there should be one RSL as the sole developer for each Housing Market Area may have merit in some rural areas. However, in large urban areas this is problematic. For example, the Glasgow Housing Market Area extends beyond the city boundaries and nearly all of the existing housing associations would be debarred by their rules from competing for development funding. This would reduce competition and restrict innovation.
- 6.3 *Question 18: Do you agree that we should introduce large-scale competitions for subsidy?*
- 6.4 **Reducing development costs should not be the only concern of a Government that seeks a fairer, healthier, safer and greener Scotland.** The quality of the place that is created must be a major consideration, and the value of long-term investment in housing needs to be put into a local context. Reduced development costs may also lead to higher maintenance and running costs; whole life cycle costing should be introduced at all stages of the process to inform investment decisions.

- 6.5 Local control over development solutions, developed by community-based and local RSLs, has created places that meet the criteria of 'Designing Places'. Such processes, and places, have also been an important part of community capacity-building as part of developing sustainable communities. These benefits must also be considered when looking at the procurement process.
- 6.6 The Government's aims to improve housing design and environmental performance within the RSL sector are important objectives; however, the risks of failing to achieve these aims by adopting a reductive approach needs to be very carefully assessed.
- 6.7 As in other sections of this response, it is the overall quality of the places made, as much as the individual quality of buildings, that will provide best value over time.
- 6.8 *Question 19: If not, how would you ensure that public subsidy is used to build as many good quality RSL houses as possible?*
- 6.9 As recognised in the discussion paper, the holistic approach of local housing associations in Scotland, rooted in the local community, with long-term interest in investing in the community and with local knowledge, have been playing an important role in creating successful housing developments, and we support this approach on creating successful communities and places.
- 6.10 There will be opportunities to overhaul the Scottish Housing Quality Standards (SHQS) in line with Low Carbon Building Standards Strategy for Scotland.
- 6.11 Best value delivery requires more than numerical calculations, and the temptation to build "more for the same sum" should be resisted. The lessons of the 1960s and 1970s need to be kept clearly in mind, and a balanced score card, including social and environmental elements should be employed.
- 6.12 *Question 30: Do you agree that we need to find new ways of focussing on the quality of place/open space and greenspace within deprived neighbourhoods?*
- 6.13 **Yes.** However our comments relate to all settlements, not simply those dubbed deprived, and they relate to all public space, not simply greenspace. A general depletion of the public realm is in progress throughout the country, and with it the public life of our neighbourhoods. It really is that serious. We do not mean here 'environmental improvements' alone, but the fundamental design of settlements, which affects how people move around, where they meet, the richness of visual experience, the nodes and connection of daily life. **The quality of spaces between buildings is a vital component of the quality of place, and therefore the quality of life – particularly within deprived neighbourhoods.** A key aspect of the failure of many of these areas that has resulted in their demolition has been the low quality of the environment and space around buildings which have made them unattractive and unsustainable places to live.

However this attention should not be limited to designated 'green space' and 'play space', but should also include access, roads, parking areas and common backcourt areas. Too many housing developments are dominated by roads designed to ease traffic, rather than to

slow it down and encourage pedestrian movement. Masterplans need to address this, and consider the maintenance issues arising out of public space.

- 6.14 A+DS welcomes this focus on the quality of places, which is essential if real change is to be brought about, not only in deprived neighbourhoods, but also much more generally in housing and other development. The paragraphs on Better Neighbourhoods are most encouraging, and A+DS is supportive of the “quality of space” project work, and in particular the guidelines and standards for the quality assessments of green space in neighbourhood areas.
- 6.15 A+DS has been in discussion with Homes for Scotland and others regarding what could be a parallel set of criteria for place making in terms of the built environment and public realm, as a mechanism for lifting the level of ambition in urban design, and delivering more successful results. This is seen as especially necessary in suburban developments by the private sector, where high quality layouts, shared spaces, green space and public realm generally are very rare.
- 6.16 A tenure neutral approach could usefully be explored for a set of criteria which could assist those at the early stages of developing proposals, but which could also be used to assess already built schemes.
- 6.17 Work on “quality of place” and quality assessments of greenspace should be considered as potential models for wider application, including urban public realm. We welcome the appreciation of the significance of (green) space in the life of a community and of being responsive to local need. This issue has already received much attention in a range of policies and funding streams aimed at communities 'doing it for themselves', especially in deprived areas, where physical improvements are also bracketed with capacity building. **Too often, though, these moves are necessarily ameliorative rather than structural, relating to a discrete site rather than conforming to any kind of spatial strategy.** The danger is that the space is less sustainable as a result; and the lack of connection between funding for improvements and any sustained management and maintenance adds to that risk.
- 6.18 Costs associated with open space and public realm maintenance are seen too often as simply a cost burden. Maintenance and management of shared space and public realm is of paramount importance, especially in deprived neighbourhoods. Scotland will benefit if it follows the actions of most European nations who have made a virtue of the quality of their overall physical environments in housing, as well as their civic spaces. Nonetheless, attitudes to open space can change, as illustrated in the consultation document; and such change across a wider section of Scottish society could be achieved with relatively modest means.
- 6.19 A critical aspect of new housing layouts relates to the standards for roads design, which are often working against a place making outcome. It has been demonstrated that better design of spaces, where the pedestrian has natural priority, lead to drivers moderating their behaviour, and thus generate safer environments. The Manual for Streets, which was published in England in 2007, shows how such standards can be revised and widely promulgated, and relatively quickly assist the place making agenda. This is a most important issue, for early action. A+DS has seen numerous projects where greater flexibility in the design of such spaces would have been welcomed by local authority planners, by the

house builder, and by the community, but where responsibility for taking such decisions proved to be too difficult. A national approach to this single issue would do much to assist the urban design agenda across the country.

6.20 Roads design standards should be revised to assist the development of safer, more enjoyable streets in housing areas. Given the core importance of well-connected streets, and spaces that have function and significance, the opportunity of a new housing development to redeem or stitch together a *wider portion of the urban fabric* should always be taken.

6.21 *Question 31: Do you have suggestions for approaches that are not resource intensive and that include stakeholders?*

6.22 **Early consultation is fundamental.** Best practice shows that it is essential to carry out community consultation and engagement, not only throughout the design and construction of places, but also to monitor the outcomes. Local Housing Associations are well placed to carry out this work.

6.23 Time for these processes needs to be built into the programme. It is important to recognise that the community (and other stakeholders) and the development industry move at different paces. To be effective, to resource community groups and ‘charettes’ and money spent ‘up front’ in getting the quality agreed and the design right, is never wasted, but it is important that early aspirations are carried through throughout the entire process.

6.24 Any new development should be based in a spatial masterplan, which should be carried out by competent professionals in consultation with the local authority, client, users and local community. This requirement could be included in grant/funding conditions where such apply.

6.25 The thrust of A+DS’s response to this whole document is that quality and sustainability are synonymous; failed environments have required decades of highly expensive ‘regeneration’. So there is no escaping the fact that some resource will be needed to get it right, but not so much, if the delivery mechanisms are well designed. The issues are those of scale, strategic linkages, timing, empowerment – and imagination.

**Scale:** appropriate scale brings local identity, responsiveness to local need, delivery of services, accessibility to decision making. Might the Urban Task Force’s unit of 10,000 residents might be a maximum?

**Strategic linkages:** the more local the operation, the greater the need for strategic linkage, and this is an exciting challenge, made the more urgent (and easier?) by the climate change agenda. Local masterplans should be created for all neighbourhoods and integrated with the local plan process.

**Timing:** one of the first casualties of development is ‘consultation’. Local agencies are able to take a longer view and plan for **animation** of their masterplan process.

**Empowerment:** local agencies need to be appropriately empowered and resourced. The apparent inefficiencies of scale needed to resource an effective local organisation are offset



by the inefficiencies involved in mitigating the failures of less responsive services, badly designed environments, poorly integrated services.

**Imagination:** the potential of 'place' as a creative tool for transformation is only now beginning to be unlocked; the 'cultural planning' approach grows in strength. This should be embedded in the placemaking process. The work needs different skills from those of the housing official, but may simply need engagement with existing local services rather than additional resource; but once again, who is leading the delivery and at what scale will make the difference.

**6.26 Question 32:** *Do you agree that the lead role (and recipient of any resources) to undertake this work should be open to a range of stakeholders?*

**6.27 Yes – but the leadership should be taken by the local authority** who may wish to delegate to a local organisation (e.g. RSL) and resource it. A range of solutions has to be looked at, so that the best one is identified and the lead role is specified accordingly.

**6.28** Ownership (real and/or psychological), design, management and 'animation' of the public realm, both green and 'grey' are fundamental to sense of security, sense of place and quality of life, and we propose a much more integrated role for relevant local lead agencies working strategically but at the neighbourhood level. This could be a housing association, a development trust or other suitably equipped local organisation; the crucial credentials apart from the obvious ones of transparency and capacity are: *the skills to truly engage with local people while retaining strategic vision, combined with integrated delivery and management.* More traditional stakeholders would continue to be present: council departments, specialist national advisory agencies, but local decision-making and delivery would have a recognisable and accessible presence in the community. We welcome the suggestion of pilot projects to test a range of approaches.