

CAIRNGORMS NATIONAL PARK AUTHORITY

Title: Response to Scottish Government consultation on
**‘A Policy for Architecture and Placemaking for
Scotland’**

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Purpose:

To consider the current Scottish Government consultation on ‘A policy for architecture and placemaking for Scotland’ and to agree the CNPA response.

Recommendation

To approve the response to the consultation to be sent to the Scottish Government.

Background

1. The Scottish Government are refreshing their policy on architecture. The introduction to the consultation document sets the scene clearly:
2. “Scotland is a nation that is rich in heritage and creativity. Scottish ministers believe that both our historic and our contemporary architecture must play their part in providing a better quality of life for the people of Scotland as well as better positioning our country on the world stage”.
3. By refreshing their architecture policy, the Scottish Government wants to focus the debate around design, and bring together the multiple facets of architecture’s role in the Scottish economy and Scotland’s identity. The refreshed policy will set out a vision and strategic aims to support and provide direction to the development of the built environment in Scotland.
4. A change in emphasis from previous architecture policies is the inclusion of placemaking as a main element of the policy. Architecture should not be seen in isolation, and as such, this new policy will cover architecture, urban design and placemaking.

5. The starting point for the discussion is the identification of 4 key themes, from which the new policy will flow. These are as follows:
 - Supporting sustainable economic growth
 - Shaping Scotland's future
 - Embedding built environment design into wider policy agendas and ensuring public and private sector buy-in
 - Recognising the cultural value of architecture, urbanism and heritage.
6. The consultation document goes on to briefly elaborate on each of these themes, and then to ask a series of related questions.
7. A full copy of the consultation document can be viewed at <http://www.scotland.gov.uk/Publications/2012/05/8766>

Proposed CNPA response to the consultation

8. Annex one sets out the proposed response from CNPA to the consultation. It addresses each of the questions asked by the government, and draws together a lot of the current thinking and discussions that have been taking place here about design, architecture and placemaking.
9. The proposed response answers the questions set out in the consultation document, but also makes a number of general comments, specifically related to architecture and placemaking here in the Cairngorms National Park.
10. The two main themes that run throughout the proposed response relate to architecture and placemaking being 'place specific' and to the role of architecture and placemaking in achieving the government's carbon reduction commitments, and associated adaptation to the effects of climate change.

Recommendation

11. That Planning Committee approve the response to the consultation to be sent to the Scottish Government.

Alison Lax
Cairngorms National Park Authority
August 2012

Annex I: Proposed response to be sent to the Scottish Government.

Suggested CNPA response

1. The Cairngorms National Park Authority welcomes the opportunity to take part in the consultation on the policy on architecture and placemaking for Scotland 2012.
2. As a National Park Authority, and a planning authority, the quality of architecture, design and placemaking is an important issue for us, and an area of which elements are embedded in all our 4 statutory aims as set out by the National Parks (Scotland) Act 2000:
 - To conserve and enhance the natural and cultural heritage of the area;
 - To promote sustainable use of the natural resources of the area;
 - To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public;
 - To promote sustainable economic and social development of the area's communities.

These aims are to be achieved collectively, and in a co-ordinated way.

3. We have included our aims in full here in order to highlight the fact that they actually set out all of the issues this consultation is looking at – the words may be different, but the sentiment is the same. And this shows why we as an organisation are pursuing an active sustainable design / architecture / placemaking agenda, in order to deliver our aims and achieve the best for the National Park, its natural and cultural heritage, its businesses, communities and visitors.
4. Please see below for our response to the consultation. The first section includes some general comments, and the second section sets out answers to the specific questions asked as part of the consultation.

General points

5. The four themes:
Whilst we don't argue with the themes that have been suggested, we think there are some important points which have been missed and which should be an integral part of the new policy. They link to other government objectives, and the delivery of these should be fully integrated into this new policy on architecture and place making.
 - Place specific – the policy should consider what makes good design in Scotland, and then within parts of Scotland, and so there is a focus on how a good policy should reflect local differences and qualities - not a one size fits all approach. Design in the Cairngorms National Park should reflect what makes the Cairngorms a special place. It's not about competing with other areas, but about focusing on what makes every place special – Our special place.
 - Low carbon / climate change – the policy should make explicit reference to the importance of architecture and placemaking to achieving our carbon reduction commitments, minimising effects of climate change, and playing an integral part in the pursuit of a low carbon economy for Scotland. This could relate to the importance of reusing existing buildings, bringing empty homes back into use, reconsidering VAT relief for renovation work as opposed to just being for new build, energy efficiency and fuel poverty issues, and links to architecture integrating with renewable energy generation.
 - The second point above should also link to making the most of what we already have, both from a cultural heritage aspect, but also from carbon point of view (this is mentioned later on “We cannot afford to be wasteful with our existing building stock or to overlook opportunities for reuse”), but we believe it's more fundamental than that and so should be mentioned in the themes upfront.
6. A truly sustainable economy should recognise and value high and sustainable standards of environmental design.
7. In general terms, we would rather see reference to 'conservation' and not 'preservation' in terms of the built environment. Preservation can be seen as trying to pickle the past in aspic, whereas conservation has a broad definition, which is more appropriate in this context.

Response to consultation questions

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

- Taxation issues – we would support a change in the VAT system so that refurbishment and renovation are taxed at the same level as new build.
- Economic benefits of good design - sustainable and affordable design and placemaking, means we create places that are affordable for the long term - affordability in terms of living in / using / heating / lighting buildings.
- Local delivery / local materials – encouraging the use of local materials and contractors helps to keep the economic benefits of good architecture and placemaking in the locality is key to the success of this policy. This approach helps support local businesses, provide employment throughout the whole of Scotland, and to make the most of the skills and materials that are available in different parts of Scotland. This also has the benefit of ensuring local differences are celebrated and architecture and placemaking reinforces what is special about individual places, and doesn't just encourage the one size fits all approach seen in recent years, which is eroding Scotland's distinctiveness.

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

- We would like to see recognised standards for environmental performance embedded into policy to ensure increasing standards and a level playing field for all involved. This approach also necessitates clear links to be made between architecture / placemaking, the planning system, and building standards.

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

- We agree with the emphasis in the consultation documents on local sourcing – one suggestion that could be promoted is the creation of local materials stores, for example, if a council / other organisation is aware of demolition work, the materials could be stored in a central place and made available for future work that may require these difficult to acquire local materials.
- Local sourcing could also be encouraged through the promotion of environmental policies within the construction industry. Another benefit of local sourcing of materials is the economic benefits to the area, and the idea of keeping wealth local. This is important in an area like the

Cairngorms National Park, where we want to see local materials used, for aesthetic, environmental and economic reasons – a win win win situation.

- Links to training and skills development for smaller local companies who have an opportunity to get more involved in this area of work – if we have the skills in our area, then it will be easier to see this objective delivered on the ground. The 'Cairngorms construction skills project' is one example of how investing in skills development for young people in the construction industry has worked, and one which we would be happy to share with others as good practice in this area.

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

- The consultation document focus on energy efficiency, but what we actually need is resource efficiency – we suggest that the policy is broadened out to accommodate this. The availability of resources, whether energy, water or constructions materials, will become an increasing issue in coming years, and so the policy should reflect this.
- The basic underlying principle should be to ensure the policy and activity that flows from it is focused on fabric first interventions.

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

- We support the principle of using community centred design events, but we also need to ensure people are engaged broadly in this agenda on a day to day basis in order to really get people involved.
- The policy should focus more on getting young people involved, and engaging schools in the architecture and place making debate. Schemes run by organisations such as Planning Aid Scotland, with their In My Back Yard programme are one way of getting school children to think about planning and place making, but it could be taken further, through more encouragement of consideration of place making in school curriculums.

Q6: What should the short term, medium and long terms priorities of policy now be?

- It is hard to say that any of the suggestions made in the consultation document are not important – and the relative importance will depend on the specific agenda you are coming from. However here in the Cairngorms the issues of affordability and sustainability take precedence in our view.

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?

- Continue to raise the profile of good design and placemaking at a national level.
- Need to move to a position where quality design and placemaking is expected. It's not enough to aspire to it, it needs to become reality. There is far too much mediocre and downright poor architecture and place making in Scotland, and this has to change. For this to change needs the buy in of a range of sectors. Planning Authorities, like the CNPA, have an important role to play in this, and we are engaged in a programme of work to try to improve the quality of design in the National Park. A key element of this is in us shifting our own culture / approach and we are taking steps to do this. We also need to work with others, and we have an important enabling and facilitating role to play to help to actively bring forward good architecture in the Park. We are keen to improve what we do and work with others to achieve a better all round result for the Park, and the quality of architecture and placemaking across the board in our area. Good quality design and placemaking is possible, and there are good examples in Scotland, it's just not the norm, and that is what it should be.

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

- The rules governing public sector procurement certainly have a role to play here, and we should be seeking to ensure that small local firms are not penalised by this, and that clear environmental standards are set at the outset when plans are being made for new public sector investments..
- The policy could go on to encourage masterplanning / design brief exercises to be undertaken in partnership between developers, the community and the planning authority.

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

- The policy should encourage benefits to remain in the locality – utilise local resources, get people involved and engaged, and focus on local delivery and procurement. This will help to support a wide range of local enterprises.
- Open space and children's play areas outside / making streets places where children can play is also an important point that should be taken forward to ensure communities are active, safe and vibrant places.

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

- Awards for good design and placemaking have an important role to play here. The first design awards for the Cairngorms National Park have been held this year, and we are in the midst of the judging process at the moment, following a great response and a large variety of responses. We intend to sue the awards, and forthcoming case studies to highlight what is good in the Park, and we intend to build on this approach in the future. However, the policy also needs to encourage people to move beyond this, and into some more practical means of celebrating what has and can be achieved. The use of national standards for environmental performance could help to raise the bar and set a clear benchmark of what is expected across all new development.

Q 11: How could the policy help capitalise upon links between the quality of design of our best new cultural building and public interest in their exhibits?

- We suggest incorporating aspects of the buildings' design and construction into the exhibitions themselves. Many people are interested in the buildings that house cultural exhibits, and so would appreciate being able to learn more about the design and construction of any new space / cultural building.

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

- There are clear links here to getting the general public, and local communities more involved and engaged in the quality of their local built environment.