



RIAS

The Royal Incorporation of Architects in Scotland

Submitted via email to: scotplan@gov.scot

SUBMISSION TO THE SCOTTISH GOVERNMENT NATIONAL PLANNING FRAMEWORK NPF4 CALL FOR IDEAS

The Royal Incorporation of Architects in Scotland (RIAS) welcomes the invitation to respond to the Scottish Government's consultation and *Call for Ideas* on the National Planning Framework NPF4.

The Royal Incorporation of Architects in Scotland (RIAS) is the professional body for all of Scotland's chartered architects. Our members work in over 1000 architectural practices of all sizes, as well as in areas of industry from housebuilding to local and central government. The RIAS should be seen as a prime participant in the review process. The RIAS is responding on behalf of the 5000 members of the architectural profession. The RIAS has drawn on its members' expertise in planning and housing, sustainability and conservation and offers the following matters for consideration.

We have set out ideas in relation to the specific questions and agendas referenced and provided supplementary recommendations that we believe should be considered in developing the next phase of Scotland's Planning Framework. The RIAS would welcome the opportunity to address any of the points raised in this paper and to assist with calls for evidence that may follow.

Underpinning any aims of a new foundation plan for Scotland, we should recognise the Sustainable Development Goals (SDGs), set by the United Nations General Assembly in 2015, to be achieved by the year 2030.

The new NPF4 should not lose sight of the 17 broad based and interdependent goals in making provisions for our new Planning Framework for Scotland:

1. No Poverty
2. Zero Hunger
3. Good Health and Well -being
4. Quality Education
5. Gender equality
6. Clean Water and Sanitation
7. Affordable and Clean Energy
8. Decent Work and Economic Growth
9. Industry, Innovation, and Infrastructure
10. Reducing Inequality
11. Sustainable Cities and Communities
12. Responsible consumption and Production
13. Climate Action
14. Life Below Water
15. Life on land

16. Peace, Justice, and Strong Institutions
17. Partnerships for the Goals

There are 169 targets for the 17 goals, and each target has between 1 and 3 approved indicators used to measure progress towards reaching the targets; in total there are 232 approved indicators to measure compliance.

1. What development will we need to address climate change?

The greater part of the built environment which exists now will continue to be our living environment in the future. NPF4 should include measures to ensure that this is made fit to address the changes and support the requirements of placemaking.

NPF4 should also be considered in the context of the Scottish Government's commitment to being Net Zero Carbon by 2045. That commitment will not be achieved through the Building Regulations alone and must be supported by the planning system. Development should demonstrate how it will meet the Scottish Government's carbon and climate commitment (and other local authority more stringent commitments) early in the design process.

Clearly, all forms of development need to address climate change, and as may be seen from a period in lockdown, carbon emissions have dropped, so it can be done. The population of Scotland will need to be proactive in every aspect of our lives to reduce carbon emissions. Architectural design should see this as a guiding principle. We are going to have to give further and fuller considerations to how people live, the design of homes and the resources used in building them.

We have highlighted the following detailed opportunities, some of which are already principles that are embedded in planning policy;

Place and Infrastructure

- **Future Flood Plains:** More extreme weather patterns will have effects on our established plans and places. There should be greater attention to the designation of land on potential future flood plains.
- **Retain, Reuse and Maintain Existing Buildings:** Actively encourage the reuse of existing buildings and apply a policy framework that supports reuse and retention and recognizes where compensatory measures can be used to support its reuse. Existing housing and building stock upgraded to meet higher standards of insulation and durability. Essential natural and cultural resources have to be conserved. All existing buildings contain embodied energy and the materials and construction skills of their builders. It is important that existing buildings are maintained and kept wind and watertight even before further measures in relation to energy performance are considered.

- **Brown Field Development and Increased Densities:** Prioritise brownfield development and increase / set minimum levels of density for inner city brown field sites.
- **Green/ Open Space/ Green Infrastructure and Biodiversity Net Gain:** Set goals for the provision of green/ open space as an integral part of major developments and remove the right to offset provisions.
- **Protect existing green infrastructure and trees:** Extend protection under tree protection orders to green infrastructure.
- **Car Use and Active Travel:** Car use is one of the biggest contributors to CO2 emissions and pollution and solutions to counteract car ownership and consider active travel alternatives are essential.
- **SUDs:** Encourage the use of above ground attenuation linked to landscape treatment.

New Standards and Materials Use

- **Renewable Energy / Fabric First:** Encourage the use of a fabric first approach to energy use. Always reduce demand as the primary objective.
- **Standards for Housing:** Apply standards such as the 'Glasgow Standard' across all new housing in Scotland.
- **Maintenance and Management:** Consider maintenance plans for buildings as part of the planning process.
- **Growing Food:** Consider provision for areas of food growth.
- **Home Working:** New housing could have a mandatory space allowance for home working such as described in Aspect Silver Level 6.
- **Low Embodied Carbon:** New proposals have to demonstrate that the materials being used are low embodied carbon.
- **Deconstruction:** Include a deconstruction plan with 100% waste recoverability as part of a planning application.
- **Design for Long Life / Loose Fit:** All new buildings need to demonstrate that they can be easily adapted for alternative use.
- **Design out Waste:** Planning conditions should include targets for waste management both on site, off site and in use.
- **Pitched Roofs:** All new low-rise housing needs to demonstrate how the roof space can be easily converted into additional space. This should include the shape and form of the structure.
- **Post Occupancy Evaluation:** Include post occupancy evaluation as part of future planning applications to be submitted to the Planning Department a year after completion, to demonstrate that the aims of the project are being met.

2. How can planning best support our quality of life, health and wellbeing in the future?

Our Quality of life and wellbeing in the future will be best supported by well-informed planning practice guiding new and existing development through the sensitive design of places and placemaking. NPF4 with its provisions should foster a greater relationship between the need to be met and the special character of the place within which the development is located.

Education and raised awareness of what makes good places can be achieved by drawing together professional expertise alongside communities and decision makers.

The fundamentals of Place and Place making should be at the heart of all development as important components of a healthy environment. Jane Jacob's 1960's book about the death and life of great American cities notes: "*Dull neighbourhoods are inevitably deserted by their more energetic, ambitious or affluent citizens, and also by their young people who can get away*".

"Our Place in Time" (OPIT); the historic environmental strategy for Scotland ensures the cultural, social, environmental and economic value of Scotland's heritage makes a strong contribution to the wellbeing of the nation and its people.

Guidance such as conservation area management plans and city centre development briefs are valuable tools for planners and architects. It is important to ensure that this good work is supported and continues to be regularly reviewed and developed.

Detailed opportunities include;

- Influence: Place a greater emphasis on community priorities as demonstrated by consultation processes and the role of Place Plans, for example.
- Transport / Pollution targets and standards: Improving air quality is essential by managing car dominance and encouraging active travel.
- Low Emissions Zones: Introduce and increase the scope of low emission zones to reduce car use, pollution and encourage 'green' transport networks.
- Avoid Toxic Materials: Include statements on the use of toxic materials in applications. Currently the consideration of materiality is limited to the major surfaces e.g. roofs, walls when there are a number of other important considerations e.g. the materials used for windows.
- Protection and Accessibility of Green/ Open Space: Better protect existing green space and encourage the creation of new green space that is accessible. Remove the option to offset the inclusion of green space and play through financial contribution.
- Playing fields: Consider carefully the removal of any playing fields as a change of use.
- Biodiversity Net Gain: Support the principles that ensure development improves the biodiversity of an area.

3. What does planning need to do to enable development and investment in our economy to benefit everyone?

This question needs to be addressed in the context of the changes that we are all going to make as a result of the 'new normal' and climate emergency. Economic development cannot be viewed in isolation.

The zoning of green field sites for development at the edge of settlements has had serious consequences for our cities, towns and villages at every level, reducing the ability to develop public transport and increasing reliance on private car use, which is damaging our ability to respond to the climate crisis.

Developments are generally self-contained, and rarely respond to the immediate needs and the wider needs of an expanding settlement and do not anticipate the long-term impacts of continuing expansion. Community facilities are rarely integrated, and are left as plots of land that are off loaded to independent retail operators or the local authority.

Critically, NPF4 should identify where beneficial investment can be made by developers and housebuilders to bring certainty and avoid the impacts from of land banking. Masterplanning could be used to allow developers to bid for the opportunity to build on defined plots.

To bring change about and manage the socio /technical changes needed there should be a defined period of transition, or programme, for the longer term transformative change, with goals set for Government and big building firms to meet goals defined by people themselves who are willing to initiate that change.

Applying new measures to the planning process including an increase in submission fees was understood to be generally acceptable if there was a reasonable expectation of a positive outcome from an application. Planning decisions should move more efficiently through the consultation process to avoid inordinate delays.

Detailed opportunities include;

- Effective Land Supply: Land designated for housing should be "effective", with no uncertainty about matters such as ground conditions and access.
- Urban Renewal: Maintaining tight urban boundaries will ensure that development pressures are directed as far as possible to redevelopment land and brownfield sites; maintaining pressures for urban renewal and improvement within established communities
- Placemaking and Mixed Use approach: Ensure that all new major developments are mixed use and are designed to include or be connected to amenities. Local Place plans can support these requirements. Large housing developments should incorporate commercial use while likewise large commercial proposals have to incorporate residential use, planned within the wider urban design.

- Local business – support commercial development that complements the local economy with a range of opportunities
- Co-housing development and self-build: consider mechanisms to allow individual involvement in new housing incorporating different solutions/ models.
- Design for Long Life / Loose Fit: Look at how adaptation can be incorporated into development to reflect changing needs. Make it a requirement that an application shows how it could be adapted to a different use.

4. How can planning improve, protect and strengthen the special character of our places?

Planning should both build on the mechanisms already there to recognize the special character of places, including designations for example the Conservation Areas, and draw on design skills to protect and enhance established building groups and urban features where these exist.

To be able to improve, protect and strengthen the special character of our places we need to better understand what place is.

For example, there should be a heightened awareness of history, local culture and traditions of established communities, through education of communities and consultations. The greater part of the built heritage of buildings and communities we have to manage were created by earlier generations and we have a fine heritage of listed buildings and mature communities to help us, and to enhance and improve these, as far as can be done.

There is the opportunity to do this through the requirement in the new Planning Act 2019, to establish Local Place Plans.

Architects, Urban Designers and Landscape Architects are able to bring their skills to bear.

We would support consideration of the following;

- **Retaining Existing Buildings:** Greater effort should be given to retain existing buildings, not just those that are listed but those which make up the ‘background’ character of place. Many town centres are especially vulnerable to loss of quality buildings through neglect. These can often be renovated to form new homes. Tax benefits to encourage this are required.
- **Multi-Generational Design:** Integrate different age groups and tenures as opposed to segregating them. The young need to be afforded more opportunity to remain with their communities, the biggest factor preventing this aim is the provision of affordable housing.
- **Local Materials:** Quality of place is often a result of the use of local materials; these should be encouraged wherever possible. Targets should be set for the use of local materials. Local materials could be categorised as those found or manufactured in Scotland.

- Local Economy: A big factor in the quality of place is the local economy, locally scaled businesses bring life and vibrancy to place; these should be encouraged.
- Mixed Use: Good place requires vibrancy; encourage mixed use in all instances. Commercial areas will benefit from the foot fall and natural policing of residential use. Residential use will benefit from having local amenities within close proximity.
- Responding to the Local Vernacular Design: Encourage innovative design that responds to 'place'.
- Green Space: Targets for protecting existing green space and new usable green space needs to be encouraged using net gain principles and avoiding offsetting.
- Transport / Use of the Car / Pollution / Active travel: Balancing the impact of the car and provide active travel alternatives.
- Design for Long Life / Loose Fit: Do not treat 'place' as static, it is in constant flux, make 'place' more resilient by making it more flexible.

5. What infrastructure do we need to build to realise our long-term aspirations?

Principally, the new Act requires authorities to co-operate to identify regional needs and bring these together within the spatial plans for areas throughout Scotland.

NPF4 should ensure an infrastructure-led approach to development. Disaster risk mitigation would be best built into planning strategies.

With further reference within a programme of change, the implementation of infrastructure need should be simplified either by a CPO process or an agreed, time limited process to prevent long delays or frustration of the proposals by protracted and expensive legal delays.

It is important to not only consider what new infrastructure we need but also our existing infrastructure which we need to protect.

Our cultural and heritage infrastructure has often been lost to make way for new large scale infrastructure projects and should be identified as a resource.

Further considerations include:

- Reduced Car Use / Public Transport: We recognise the use of the car will need to reduce to combat pollution and that future infrastructure provision should reflect this change and focus on improving public transport. We should also consider ways to better maintain our existing roads and improve existing public infrastructure.
- Active Travel: The network of pedestrian routes and cycleways has to be increased and a greater priority be given to pedestrian/cycle use.
- SUDs: Encourage the use of above ground attenuation integrated with landscape design. Avoid the use of large basins and find solutions which disperse attenuation across development sites.
- Energy Use: Look to reduce our energy output ahead of generating new energy networks. Can we achieve what is required with our current energy networks and use

our resource in improving the energy performance (through fabric first) of our building stock?

- Waste: Reduce waste and support this by introducing infrastructure to help this happen.
- Green / Water Infrastructure / Biodiversity net gain: It is important to increase our network of green / water infrastructure, for example, create biophilic corridors across urban areas.
- Cultural / Heritage Infrastructure: Protect the assets that contribute to 'place' and placemaking.

Supplementary Recommendations

Protection

Protect the following:

- Prime quality agricultural land: which like flood plains is easier and cheaper to develop land for housing.
- Greenbelt: There should be increased protection for green belt land and urban green spaces, including sports facilities such as bowling greens, tennis courts and golf courses.
- Water Management: There could be fuller proposals around the use and management of Water; seas, estuaries, rivers, lochs with their appearance, conjunctions, importance and opportunities for ecological improvement.

Informed decision making

- Despite the present crises, the Covid-19 pandemic and consequent economic downturn, there should be no weakening of the regulatory role of planning.
- Better prepared: to consider applications and make well informed decisions on matters of suitability of development,
- Local government councillors: should be supported for the task and well versed in the requirements in council meetings and in Local Review Bodies.
- Reporters: they may welcome some design guidance to help the decision process.
- Provisions in the SPP: Policies currently expressed as a 'should' be considered to be a 'must'. NPF4 should enable the outcomes that make that purpose clear. Government must expect to fund local authorities to achieve this.
- Historic Environment Policy for Scotland (HEPS) is a policy statement directing decisions that affect the historic environment in Scotland. We would like to see HEPS incorporated into SPP within NPF4, making HEPS statutory. HES guidance contained the Managing Change suite of documents should continue to be material matters in the consideration of planning applications.

Effective Land

- Housing Land: There is the continuing debate around housing land, and how can effective sites be brought forward. There are many different models to be considered with participators looking to "land value capture", an approach which will not readily

find cooperation with established land holders. A more measured approach following “land value sharing” might be a better way forward and is more likely to stimulate positive co-operation from land-owners and others.

- Development land: zoning needs to be more keenly related to the proposed uses, especially in relation to location of housing, to better align where people live to their type of work, and relationship to the regional placement of centres of industry and productive work. In making such decisions we should leave a positive legacy for future generations.

Design

- Densities: It is important that planning policy includes stronger guidance on plot densities in terms of building heights, and that the spatial relationship between neighbouring buildings be robust enough to clearly identify the limitation of development on a site.
- Protecting Character etc: Overdevelopment affects not only the building plot but also the surrounding streetscape and such development can have a significant impact on skyline and long vistas, and negatively impact on the setting of historic buildings and conservation areas.

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