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Dear Jim,

RE: A POLICY ON ARCHITECTURE AND PLACEMAKING CONSULTATION 2012

The Scottish Wildlife Trust¹ welcomes the opportunity to comment on the Consultation on A Policy for Architecture and Placemaking.

The Scottish Wildlife Trust believes that inappropriately located and badly designed developments can have significant, detrimental impacts on Scotland's biodiversity and on people's quality of life. We also believe that delivering high quality sustainable places where people want to live can only be achieved by having a robust and well resourced planning system. This would ensure that planning decisions are made by knowledgeable, innovative, confident and competent planners.

In responding to the consultation we present the general point regarding the natural environment being integral to placemaking and then set out in more detail key points that must be addressed in the policy to ensure that we create sustainable places in Scotland where people want to live their lives.

General point

The consultation states that the design of both buildings and places has a vital role to play in supporting the economies and social health of communities and that how we build and re-use our existing buildings is also vitally important in mitigating the effects of climate change. Whilst we agree with this, we would like to stress that the 'quality of place' is founded on a high quality environment and we believe there must be a strong emphasis on 'designing in' natural features and green infrastructure to compliment the built environment in the policy.

The consultation also states that it is important to recognise the benefits that good design brings which can add to the effectiveness of other policies. We believe getting the greenspace right around the 'grey' can make or break the ambiance of a place. The positive association between a healthy physical environment and health and well being has been acknowledged by the Scottish Government and the Health Board, indeed the Chief Medical Officer of Scotland has stated: *A relevant environmental health agenda for the 21st century is as much about the creation of places which engender good physical and mental health, as it is about protection from hazards.*

To reiterate, this policy should reference the importance of green infrastructure to placemaking and link to the recently published Scottish Government guidance on Green Infrastructure: Design and Placemaking.

¹ The Scottish Wildlife Trust, established in 1964, has the charitable purpose to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With 120 reserves and a network of volunteers the length and breadth of the country, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. Our vision is of a network of healthy and resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas. This is the 'Ecosystem Approach', which is the basis of The Wildlife Trusts' UK Living Landscapes and Living Seas initiatives.

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Key points

Green Infrastructure (GI)

The Scottish Wildlife Trust was disappointed that the consultation had given very little recognition to the importance of the natural environment in framing and creating quality places. Green infrastructure² should be afforded greater priority in the policy. The policy should seek to encourage restoration and well designed provision of GI in existing and new developments respectively, and 'value' this as a real asset (i.e. as economic, social and environmental capital, not simply financial capital) in the same way as built infrastructure is valued.

That the quality of outdoor space is an important part of placemaking and contributes to health and wellbeing, is supported by a growing body of evidence which shows that access to good quality urban greenspace is essential for physical activity,^{3,4} positive mental well-being⁵ and healthy childhood development.⁶ Contact with nature has also been shown to reduce the severity of childhood Attention Deficit Hyperactivity Disorder.⁷ In addition, it has been found that income related health inequalities are reduced by having easy access to high quality greenspace.⁸

The impacts of greenspace and the wider neighbourhood physical environment on health are recognised in 'Equally Well',⁹ the Scottish Government's strategic framework on health inequalities, in 'Good Places, Better Health'¹⁰ and in the soon to be published 2020 Challenge for Scotland's Biodiversity.¹¹

That greenspace matters has also been shown in the public consultation for the rebuilding of Christchurch City after the earthquake. Over 100,000 responses revealed that greenspace was the number one priority for Christchurch's residents¹². Greenspace is valued by Scottish people too with 42% of the population visiting urban parks at least once a week.¹³

Impact and status

The Scottish Government has produced many excellent policies and guidance notes for decision makers such as the original Designing Places, Designing Streets and Masterplanning, but up until now the principles within these very practical policies and guides have rarely been widely implemented on the ground. We believe this is not because of lack of ambition from Ministers rather, there is a short-term perceived need to kick start the economy at all costs which is an overriding imperative.

In recognition of past failures to translate policies into practice, this policy must set clear outcomes on the type of places we want to create and restore in Scotland and then produce a related plan of action to make this happen. Key to this is tackling 'blockages and barriers' such as skills and training, 'rule book' engineering taking precedence over good design, and tackling formulaic, volume house building styles head on.

We also believe that to be effective and elicit change such that we begin to see high quality buildings and places being the norm across Scotland, the 'status' of this policy needs to be clearly established.

²For more information on green infrastructure see http://ec.europa.eu/environment/nature/ecosystems/index_en.htm

³ Tanaka A., Takano T., Nakamura K., (1996) Health levels influence by urban residential conditions in a megacity. Tokyo Urban Studies 33: 879-945.

⁴ Sugiyama T., Thompson C.W., (2007). Older people's health, outdoor activity and supportiveness of neighbourhood environments. Landscape and urban planning. Vol 83 (2-3) 168-175

⁵ De Vries S, Verheij R A and Groenewegen P (2001). Nature and Health .The Relation between health and green space in people's living environment. Euro Leisure-congress Netherlands.

⁶ Sadler et al (2010) Bringing cities alive: the importance of urban greenspaces for people and biodiversity. Urban ecology (ed. K.J. Gaston) Cambridge University Press, Cambridge.

⁷ UK National Ecosystem Assessment (2011) Page 386

⁸ Mitchell R, Popham F (2008). Effect of exposure to natural environment on health and inequalities: an observational population study. The Lancet, Volume 372, Issue 9650, pp1655- 1660.

⁹ Scottish Government (2008), Equally Well: Report of the Ministerial Task Force on Health Inequalities.

www.scotland.gov.uk/Publications/2008/06/25104032

¹⁰ Scottish Government (2008), Good Places, Better Health: A New Approach to the Environment and Health in Scotland. www.scotland.gov.uk/Publications/2008/12/11090318

¹¹ A Consultation on the 2020 Challenge for Scotland's Biodiversity

¹² See: *draft* Central City plan. Christchurch City Council available at:

<http://www1.ccc.govt.nz/council/proceedings/2011/august/cnclcover11th/13.Attachment1Volume1.pdf>

¹³ UK National Ecosystem Assessment (2011). The UK National Ecosystem Assessment Technical Report. UNEP-WCMC Cambridge. Section 10.3.3.3 page 388

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If the policy is a material consideration, then clear language should state what the consequence of not complying with the policy will be e.g. *Planning applications will be refused if they do not comply with the principles set out in this policy.* This should then be enforced.

There is also a need to make the connection between the positive effect this policy will have on other sectoral policies (e.g. health and well being, climate change) and what potential barriers and conflicts may arise from other policies which will prevent its implementation (e.g transport). To be effective, this policy must have influence over other sectoral policies, as these are often the ones determining the quality of outcome. In short, this policy needs to influence transport (particularly roads), health (active towns and cities), water and energy use and generation.

Resilience

Whilst the low carbon agenda features strongly in the consultation document, there is far less of a focus on the role of buildings and places in adapting to climate change. Building resilient places has a strong ecological dimension (management of water, maximization of biodiversity and improvements in air quality for example) but this is also linked to the longer term socio-economic health of settlements and the people that live and work in them. The policy should encourage the creation of resilient places, which are less prone to environmental and economic failure during downturns and extreme events, and endure as places where people want to be.

Truly sustainable places mitigate and are adapted to the effects of climate change. A high quality environment can 'climate proof' a place. Energy costs on home and businesses can be reduced by utilising the natural cooling effect provided by street trees, green roofs and other types of green infrastructure to lower summer inner city temperatures.¹⁴ Street trees can also reduce wind speeds and combined with green roofs can insulate buildings in the winter. Large trees also lock up carbon and can thus help Scotland meet its greenhouse gas emissions reduction targets.

A network of greenspace also provides pleasant and safe active travel routes which can encourage enables movement by foot and cycle as well as public transport and car. Nature-rich greenspace in cities also encourages residents to spend more days out in their city rather than clogging up the rural road network.

Adapting to climate change means that places need to be water smart. The Scottish Government has estimated that the damage caused by river flooding costs the Scottish economy £32 million every year.¹⁵ Designing in green infrastructure not only makes places more attractive but also provides a permeable surface (e.g. green roofs, street trees, parks, and sustainable urban drainage systems) which slows water movement, reducing flood risk to homes and businesses.

Mixed and flexible use

Mixed use developments should be encouraged but so should flexibility of use of existing stock. The pop-up shop concept is a practical example of this, as is the sowing of wild flower meadows to enliven stalled brownfield sites. Indeed, long term brownfield sites can often be perceived as a blight, but with careful management can be turned into temporary parks or play areas. When development starts up, established wildlife 'pockets' can be retained and designed into development layout.

The mixed use concept should also extend to processes as well as places. If we straight-jacket ourselves into rigid procurement rules, there could be a danger of preventing good outcomes. The key here is to apply flexibility and creativity to existing buildings, wider neighbourhoods and processes.

Participation and collaboration

The Scottish Government has produced guidance on how to conduct effective community engagement (PAN 81), which has been reinforced in PAN 83 Masterplanning, which states *when creating successful places, people must be at the heart of the process.* Furthermore the Scottish Sustainable Communities Initiative has shown how 'front loaded' engagement can work in practice through 'charrettes' (there are other models used as well such as 'Enquiry by Design'¹⁶). All too often however, we still see community 'consultation' rather than engagement. We therefore recommend that the policy

¹⁴ Ibid Page 387

¹⁵ Ibid Page 550

¹⁶ Prince's Foundation for Building Communities

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should develop methods and mechanisms which allow for participation and collaboration over the full life cycle of place creation and / or restoration i.e. from concept to stewardship.

The Scottish Wildlife Trust would like to be kept informed regarding the development of the policy and would welcome the opportunity to comment further if required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Keegan'.

Dr Maggie Keegan
National Planning Co-ordinator

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