

## **RESPONSE TO CONSULTATION PAPER**

### **Statutory Guidance and Sustainable Development**

The Royal Incorporation of Architects in Scotland (RIAS) is the professional body for Scotland's 3000 chartered architects. They work in 1000 businesses on projects ranging from house building through to major commercial and public projects.

The RIAS has charitable status and offers a wide range of services and products for architects, students of architecture, construction industry professionals and all those with an interest in the built environment and the design process.

The RIAS is overall supportive of the general thrust of the aims and objectives of the proposed guidance and agrees in principle with the analysis of the issues and challenges and the actions that are needed to ameliorate the main impacts of climate change and an over reliance on finite fossils fuel reserves.

As the Executive will be aware the RIAS has been at the forefront of encouraging a more environmentally responsible approach to development, through the establishing both a Sustainability Accreditation Scheme and more recently in a Sustainability Task Group, specifically to address many of the issues highlighted in the guidance.

The draft guidance does however raise three areas of concern:

1. The proposed guidance makes mention of considering the design and layout of buildings, quite rightly in recognition of the fact that a well designed layout and massing can maximise the possibility of useful solar gains and minimise reliance on artificial lighting. However by enshrining this in planning guidance pre-supposes that Planning Officers have an appreciation of these issues, can distinguish those scheme which maximise these advantages and will accord such considerations ample weight when balanced against other policy issues.
2. The policy encourages the use of recycled materials, but does not provide any guidance on what might be suitable as a source of recyclates. There is a clear advantage in the reuse of material in preference to virgin material in general terms if this can be achieved without establishing the construction industry as a potential waste dump for other industries (thereby supporting their profligacy) or by allowing potentially toxic materials to be reincorporated into dwellings.

The RIAS believe that this element of the guidance should be removed on the basis that the use of recyclates should be encouraged, along with a requirement for demountable technologies and material audits of demolition materials within the Scottish Building Standards.

3. The policy positively encourages each planning authority to prepare their own Sustainability Standards and again whilst the RIAS understands the motivation behind these standards there is a very real danger that the possibility of up to 34 different sets of standards, each of which must be viewed in the context of the accompanying policy from each authority and the specific project in question will lead to confusion.

In conclusion the RIAS supports the general intent of the policy and the bulk of its content, however we would recommend that the requirement for design statements should be reinforced to the point where it is a requirement that a Sustainability Statement is included with all but the smallest applications and should be considered as a part of every application and that the Scottish Executive should under take the role of developing a unified set of meaningful Sustainability Standards which can be applied irrespective of location and form of application.

**RESPONDEE INFORMATION FORM: *Draft Statutory Guidance on Planning and Sustainable Development***

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

Name: Royal Incorporation of Architects

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

- (a) an individual  go to Q2a/b and then Q4  
(b) **on behalf of a group or organisation**  go to Q3 and then Q4

**INDIVIDUALS**

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

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

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

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

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4. We will share your response internally with other Scottish Executive 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 Executive to contact you again in the future for consultation or research purposes?

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