



RESPONSE TO CONSULTATION PAPER Statutory Guidance and Sustainable Development

The Scottish Ecological Design Association (SEDA) is a membership organisation which was set up in 1991 'to promote the design of communities, environments, projects, systems, services, materials and products which enhance the quality of life of, and are not harmful to, living species and planetary ecology'.

Members come from a range of disciplines and skills concerned with designing for a sustainable future. About half are architects. SEDA is currently completing the last of three design guides on sustainable construction for the Scottish Executive.

In general terms SEDA supports the principal aims and objectives of the proposed guidance, but has the following points to make:

1. SEDA feels that the urgency of action towards reducing carbon emissions (highlighted by the Stern report and numerous government directives) is such that more priority should be given to sustainability in planning decisions. Planners have to balance a range of criteria and policy issues when determining applications. Sustainability being a recent addition to these criteria, and one in which many planners may feel less confident and skilled to make decisions, may not be given the importance it deserves. This underlines the importance of providing training in this field for the planning profession.
2. As an example of the above a number of SEDA members have experienced difficulties with planning authorities over the use of locally sourced timber as an external cladding. We suggest the benefits of timber's carbon neutrality and support for the local economy should be given due weight in decision making.
3. The proposed guidance gives positive support to micro-renewables. SEDA suggests that similar "positive discrimination" should be given to other aspects of sustainability, for instance the use of locally available materials and planning for the maximisation of solar gain.
4. The importance of SEAs is stressed in the guidance. SEAs can have weaknesses. As they are commissioned by the developer/applicant they may not be totally objective, making optimistic predictions about energy performance etc. They can be little more than a "greenwash" over the proposed development. Consequently the value of SEAs depends on the level of scrutiny afforded them by the planning authority. Again we return to the question of prioritisation and the available levels of expertise in the planning profession.

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(on behalf of SEDA)