

Architecture + Design Scotland's response to the Commission on Housing & Wellbeing Consultation 2014



Architecture and Design Scotland (A+DS) is Scotland's champion for excellence in placemaking, architecture and planning. We are an Executive NDPB of the Scottish Government. A+DS aims to support the creation of places that work, which provide people with real choices and, are ultimately, places where people want to be. We champion the highest standards in architecture and place making across all sectors, advocating a better understanding of the importance of quality design in both the public and private sectors.

We are pleased to submit this response to the Commission on Housing & Wellbeing Consultation.

Section 1: Our assessment of the importance of housing for wellbeing in Scotland

Q.1. *Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?*

We agree with the Commission that housing has an important role in enhancing the wellbeing of the people in Scotland and note the observation that success cannot be judged alone by economic measures such as changes in GDP. Whilst benefits may be represented individually, in reality they overlap and interweave, and have direct and/or indirect value as recognised in: the Scottish Government's [National Performance Framework](#) and [National Outcomes](#), a Scottish Futures Forum seminar series on [Rethinking Wellbeing](#) (which featured Professor Stiglitz's recommendation regarding a dashboard of indicators), and other research programmes e.g. [Good Lives And Decent Societies \(GLADS\)](#).

The Commission's Consultation identifies eight types of wellbeing (Housing as 'home'; Neighbourhood quality; Health; Education; Employment; Income; Environmental sustainability; and, Community safety) and we suggest these and other benefits may be supported through stronger reference to the Scottish Government's desire to promote the 'place' agenda as presented in the [Creating Places](#) policy statement.

Housing is integral to the wider placemaking agenda; 'Housing', 'Wellbeing' and 'Placemaking' are inextricably linked. This is evident in relation to the development of a *Place Standard* as a commitment arising from both the Scottish Government's *Creating Places* policy document and NHS Scotland's *Good Places Better Health*: "[The purpose of the Place Standard](#) is to support the delivery of high quality places in Scotland and to maximise the potential of the physical and social environment in supporting health, wellbeing and a high quality of life."

We suggest that advocating the benefits of the 'place' agenda can strengthen and support the Commission's recognition that wellbeing is concerned with a wider concept of human flourishing. Such benefits can include stronger, healthier, more empowered communities as [noted by Sir Harry Burns](#), the former Chief Medical Officer for Scotland. Civic wellbeing can result from a strong sense of place, identity and attachment, and housing has a key role to play in this.

Housing is a fundamental human requirement essential to life: it comprises a significant proportion of 'place' and therefore has a role and responsibility to help shape the sorts of living environments that generate health and well-being benefits. It is vital for wider societal reasons that the right sort and range of good standard housing is available or able to be developed in the right locations in the

right time-frames. If housing separates into type or tenure parcels the opportunities for wider benefits to take root and flourish will be constricted. For example, homes for the elderly should not sit isolated in segregated land use locations, but in close proximity to family and other housing types and tenures so that people are able to help and support each other.

Housing has a role to help foster good neighbourliness that supports the creation of strong communities. In this context, wider benefits accrue through considering how the curtilage and spaces between housing can support social and community networks. Walkable neighbourhoods contribute to long term health benefits (children should be able to walk safely to/from schools and learn from the benefits this provides); ease of access and connection to community facilities / resources and quality open space (as promoted in [Creating Places](#)) add to social cohesion and wellbeing. Poor quality environments will incur costs (e.g. drug dependency or health care). Well-designed housing that integrates and contributes to its place represents a good investment of resources that takes account of longer term goals such as low-carbon futures or future proofing for adaption to climate change.

Housing can also help to deliver the 'Qualities of Successful Places' which support wellbeing as identified in [Scottish Planning Policy](#) (Distinctive, Safe and Pleasant, Welcoming, Adaptable, Resource Efficient, and Easy to Move Around and Beyond). [Recent research](#) for the Scottish Government, and the [Creating Places](#) policy statement, identify that different types of value are generated as part of delivering the wider placemaking agenda of which 'housing' is an integral part (most 'places' comprise housing).

Housing (whether public or private) represents a form of public investment, either as part of initial infrastructure investment and/or to service its ongoing maintenance. It is also an important driver of public services for the inhabitants; housing therefore has an active role to play in support of the preventative spend agenda advocated by [the Christie Commission](#).

A place-based response can seek to ensure that existing or new assets (which include 'housing') can work harder to support and achieve wider benefits that seek to deliver national objectives around tackling poverty and inequality, achieving low carbon futures, empowering local communities, fostering social cohesion and responding positively to the needs of the preventative spend agenda.

Q.2. *Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?*

The assessment has (rightly) noted that "the benefits that housing provides vary considerably", and can include: 'adequate space', 'good state of repair', 'free of condensation and dampness', 'insulation standards' and 'efficient heating systems'. It is correct to identify benefits which can be measured in quantifiable or technical terms. The Commission is also correct to seek and identify wider benefits, which may not be immediately apparent and which can be more challenging to define or quantify, or which stem from generative consequences of housing delivery. Good housing is essential to good lives. Investing in housing should ensure that wider benefits accrue so that money is doubly well spent – we need to think beyond mere housing numbers to consider how investments in housing can deliver place outcomes that support people's lives.

Section 2: Does Scotland invest enough in housing?

Q.3. Do you agree with our assessment of the current position on investment in housing?

We agree that investing too little in housing will result in shortage and rising prices, with attendant social, economic and environmental factors. We further agree that spending too much can divert limited resources from other important needs.

Q.4. Do you agree with our brief assessment of current policy on investment in housing?

We note the Commission's comments in relation to investment in new housing that "there is no overall target for house building as a whole based on a rigorous assessment of housing needs." We suggest this should be expanded to include ..." based on a rigorous assessment of housing needs, *and as a complement to the needs of existing places*" as housing has a role to play in place-mending.

We note the Commission's comments in relation to investment in existing housing, and support the case for raising standards across the existing stock, which has potential to stimulate, revitalise and support new economies. We suggest a focus should also be on future proofing housing stock to account for future needs and flexibility as much as present day requirements.

Q.5. Do you agree with our suggestions for further action in the area of investment in housing?

For wellbeing benefits to be fully promoted, we suggest that an emphasis on deriving quantum figures from Housing Needs and Demand Assessment (HNDA) cannot be considered independently of a thorough understanding (economic, social and environmental) of the implications and consequences of what those figures look like 'on the ground'. HNDA may acknowledge a need for housing numbers, but its implementation must guard against resultant dis-benefits arising through sprawl, car dependant environments, anonymous 'anyplace' lacking in character, loneliness and isolation, limited access to services and facilities, poor life opportunities, etc. This is especially true where the provision of new housing is located to complement and strengthen existing communities.

Whilst we support the aim behind creating 'common platforms' to attract better investment terms and conditions, we suggest this needs to guard against a standardised approach to making places. We also share the Commission's concerns regarding the need not to undermine the benefits of community involvement.

We have reservations about recommendations that may tend towards a numbers driven response; we believe that a place based response can help investment decisions to be smarter and achieve more sustainable outcomes in broader terms that support the needs of communities.

Q 6. Do you have any other suggestions that we have not mentioned in relation to investment in housing?

We support the Scottish Government's [Creating Places](#) policy statement that identifies "*Investment decisions [should be] informed by place... [and] ... Decisions should prioritise long-term benefits. The public sector should set an example by ensuring high design standards are adhered to in public procurement.*" Housing investment needs to be considered as part of a planned and integrated public investment viewed across all sectors and co-ordinated around place.

We support the Commission's aim to ensure that investment strategies in housing drive and support wider wellbeing benefits. Good quality affordable housing in the right location will bring benefits and

returns across different economies, and effective housing policy on investment should guard against the use of housing for speculation which generates an unstable economy, encourages poor design and fosters damaging short-termism attitudes, where proposals are geared towards profit-optimised standardised solutions regardless of context or other benefits.

Attitudes towards investment can be overly influenced by quantum, and there is a need to better integrate short and long term investment strategies to ensure the delivery of successful sustainable places. Those with a stake in the longer term interests are more likely to have concern for the ongoing wellbeing of the occupants and the building stock. Smart investment strategies need to focus on delivery of long term wellbeing.

Investment should support the delivery of the right types of housing, in the right sorts of places, for the right reasons, in ways that lever wider benefits. This may raise challenges in terms of working with 'the market' and attitudes towards perceived 'deliverability'. To achieve wellbeing benefits housing needs to be part of the solution (rather than a problem) that guards against generating negative externalities resulting from e.g. sprawl that encourages car ownership and unhealthy lifestyles; densities that fail to support public transport provision; monocultures of single land use which lack diversity or services and facilities to support lives; feelings of isolation and alienation, etc. Investment strategies therefore need to recognise the role that housing can play in delivering broader wellbeing aims; this may require awareness raising amongst those who inform and make investment decisions.

Housing has an essential role to play in generating value and benefits through e.g. the creation of walkable neighbourhoods where mixed uses, goods and services are available; in supporting healthy lifestyles; in fostering a strong sense of community; in ensuring people have choice and opportunity and feel empowered to take ownership and responsibility for their surroundings. Considered in these terms longer-term housing investment strategies should be considered in terms of the making of 'homes and/or places' rather than 'housing', and should be guided by long term community needs. The impacts and outcomes of housing investment, and the potential to achieve broader health and well-being benefits, are too important to be driven or dictated by the short term aims of a provider.

Investment strategies should assist the delivery of development and discourage speculative land-banking, in anticipation of future enhanced profits, which limits supply and drives up affordability.

In the spirit of delivering a post Christie pre-emptive spend agenda, the subsidising of negative externalities resulting from the creation of poor places (e.g. physical or mental health issues such as drug and alcohol dependencies resulting from feelings of isolation and loneliness) could be identified and aligned to work in a proactive positive manner. This 'cross subsidy' that seeks to ensure that the right results are achieved from the outset could also apply to the remediation of contaminated brownfield land to bring back into productive use land that would otherwise remain 'uneconomic' in residual value terms. Such 'smart' cross-subsidy is evident throughout international and national housing examples (e.g. Malmo, Freiberg, the Commonwealth Games Athletes Village, etc.). Smart investment strategies could align budgets to achieve more and work across silos to deliver wider benefits.

As part of the wider community empowerment / citizen engagement agendas, investment strategies may need to consider how they can support innovation in how local communities participate in co-design and co-production to satisfy local housing requirements. Such models would operate from a sense of responsibility to do the right thing for the communities they serve rather than seeking to extract short term profits as return for 'external' stakeholder investors. This could result in different

locally based, smaller scaled delivery models, which could potentially challenge traditional larger scaled operations.

Community 'right to buy' and land ownership could assist in recouping benefits from uplift in land values or achieving returns on investment, which may then be re-invested for the direct benefit of those communities.

We suggest that reference could be made to the development of a Place Standard assessment tool, as a commitment resulting from [Creating Places](#) policy statement. This "... *will be the hallmark of well-designed places... [and]... Its use will be an expectation of the award of subsidies provided through the Affordable Housing Supply Programme.*"

Section 3: Getting a better fit between housing and the economy

Q.7. *Do you agree with our assessment of the current position regarding housing and the economy? What more would you add?*

We agree that housing plays a major part in the economy, and provides employment and training opportunities. Given this importance, we suggest the ongoing demand for housing should support continued investment in the right types of housing to overcome cyclical downturns in housing (and other) markets and bring stability to the wider economy to sustain steady jobs and other wellbeing returns. This requires a long (rather than short) term view of how the housing industry supports local communities. We also suggest that investing in existing stock has potential to generate new economies and opportunities.

Q.8. *Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?*

We agree that policies have been geared towards supporting a growth in home ownership. When considered along with rapidly rising house prices this has tended to foster an attitude that housing is a speculative investment commodity. This move away from housing as home, to become a traded commodity that speculates on rising values, can tend to undermine the establishment of wider wellbeing benefits achieved through the formation of established secure communities.

Q.9. *What are your views about the five areas of policy reforms suggested here?*

We agree that housing should not be regarded as a means for making speculative gains, and also agree with proposals to support local initiatives (e.g. non-profit, community based organisations).

We support the need to give clarity and certainty about 'appropriate' land supply for housing, and suggest that the forward planning system needs to play a major role in this regard: the housing land supply should be guided and targeted towards realising wider benefits and place mending based on implementing a long term vision. We believe that the identification of 'appropriate' housing land supply should be in areas of need, based on a vision for the future of a place, rather than as a result of, for example, land banking and developer bids to local development plans as part of a process that 'calls for sites'.

It is important that clarity about land supply is achieved in collaboration with local communities, and can capably demonstrate the wider wellbeing benefits that are intended and how they will be delivered across time. This can help to overcome NIMBY attitudes and reveal why 'housing

development' can be viewed as a positive generator of wider benefits worthy of trade-off through development of what may be highly valued local land resource.

Section 4: Getting a better fit between housing and welfare policy

Q.10. *Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?*

We refer to the comment above (Q6) regarding a need to move towards positive proactive pre-emptive spend. Instead of using subsidies and other forms of expenditure to address dis-benefits we would support initiatives that seek to align budgets in a more positive manner to ensure the proactive delivery of the right types of housing from the outset that deliver wider benefits and avoid the sorts of negative externalities that need to be funded, reactively, by the public purse.

Q.11. *Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?*

No comment.

Q.12. *What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?*

We would support initiatives that demonstrably drive wider place-based wellbeing benefits across the medium and long term.

Q.13. *Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?*

We support positive initiatives that demonstrably drive wider place-based wellbeing benefits across the medium and long term.

The Scottish housing landscape radically altered throughout 1980s right-to-buy policy initiative. It is not inconceivable that Scotland can achieve an ambitious re-calibration of housing policy in order to achieve wider health and wellbeing benefits, and support the establishment of strong communities. This may point to re-visiting traditional Scottish housing policy options, looking at co-operatives and other European models.

Section 5: Getting a better fit between housing and the environment

Q.14. *Do you agree with our assessment of the importance of housing to the environment?*

We agree that housing has potential to make an important contribution to minimising the use of resources such as energy, land and building materials both to get best value for money and to help protect the wellbeing of future generations. The Consultation rightly recognises that this can be achieved through both 'technical' efficiency savings (e.g. keeping homes warm; providing hot water; etc) and wider 'place' related measures, such as: ensuring new housing is built in locations and at densities which do not depend on car based commuting; ensuring that maximum use is made of "brownfield" sites for new developments; building new housing to the right standards to ensure that

they will make a long term contribution to meeting housing needs; minimising the need to demolish and replace existing housing; developing more schemes to provide energy within the house or neighbourhood through micro generation; and, encouraging more communal living arrangements where this is appropriate.

The housing industry has an understandable preference for the opening up of greenfield sites and avoiding brownfield sites on the basis of 'viability'; however, this represents a short-term market view rather than a holistic longitudinal attitude to delivering longer term benefits.

Q.15. *Do you agree with our brief assessment of current policy on housing in relation to the environment?*

We agree with the Consultation's conclusion that the various policy measures have largely been successful in relation to the "low hanging fruit" e.g. where it is relatively easy to install insulation measures e.g. more homes equipped with cavity and loft insulation and more efficient boilers (albeit that moves to implement a Low Carbon Building Standards Strategy for Scotland - The Sullivan Report - have been resisted). Improving existing housing stock is a valid area of focus as much of what will exist in the future is already built. We agree that progress elsewhere has been more challenging, e.g. in relation to the Scottish Government's wider climate change targets; and ensuring development of brown-field rather than green-field sites.

Q.16. *Do you agree with our suggestions for further action in the area of housing and the environment?*

We agree with the suggestions for further action, but note that many of the medium term actions relate to energy efficiency measures; however, we note and support longer term actions intended to encourage more development of 'brownfield' land and circumvent problems of multiple land ownership.

Q.17. *Do you have other suggestions that we have not mentioned in relation to housing and the environment?*

The Commission might consider linking with the wider 'place' related agenda (refer to Q 1) e.g. through reference to the [Creating Places](#) policy statement.

We suggest that the need for strong proactive planning should be promoted, where reference could also be made to the National Planning Framework/NPF and Scottish Planning Policy/SPP emphasis on place based approach that delivers good quality outcomes.

We also suggest that the Commission might highlight a need for further actions to target and raise awareness of more challenging aspects such as ensuring that new housing contributes to reduction in greenhouse gas emissions; is built in locations and at densities which do not depend on car based commuting; and, ensures that maximum use is made of "brownfield" sites for new developments.

The HNSA analysis could link with other research programmes to demonstrate how broader national objectives can be achieved; how housing provision can support the creation of mixed and sustainable communities; and how housing investment has capacity to mend existing communities and ensure the delivery of wider health and wellbeing benefits.

A+DS has experience in the development of collective visions across different scales of place (region to neighbourhood). We believe this form of ‘test planning’ can be a vehicle to inform decision making about housing investment to maximise broader social, health and wellbeing benefits.

Section 6: Housing and Health and Education

Q.18. *Do you agree with our assessment of the importance of housing to health and education?*

This section provides a good illustration of where housing can be conceived to generate ‘more’ in terms of delivering wider wellbeing benefits. We agree that people’s lives are shaped and affected by the environments into which they are born and raised. Peripheral ‘anonymous’ sprawl remote from services and facilities can result in physical and mental health issues and generate demands on health care services. Homogenised standardised environments can hinder outlook and attainment. Just as schools are more than ‘places of learning’, so housing, as a major factor in the making of ‘place’, has an important progressive role to deliver something other than a mere ‘roof over a head’.

Q.19. *Do you agree with our brief assessment of current policy on housing and health and education?*

No comment

Q.20. *Do you agree with our suggestions for further action in the area of housing and health and education?*

We note that suggestions are structured under three headings: homelessness, older households and overcrowding. We believe we may be able to offer further input to this discussion based on our experience (see Q 21 response).

Q.21. *Do you have other suggestions which we have not mentioned in relation to housing and health and education?*

A+DS operates dedicated work programmes with the Scottish Government’s Health and Schools Directorates. We would be pleased to provide further information about how we are supporting these initiatives, which can be viewed at our [Healthier Places](#) and [Smarter Places](#) websites.

Section 7: Housing and Community Regeneration

Q.22. *Do you agree with our assessment of the importance of community regeneration?*

We agree that housing has an important part to play in regenerating communities suffering from major social and economic problems. We also agree that regeneration initiatives over the past 40 years suggest that housing improvements alone are insufficient and need to be part and parcel of a more comprehensive approach where resources are tailored to needs, and where local residents are fully involved in decisions on the future of their areas. This has not been the case when regeneration programmes are driven by a need to attract property speculation that overlooks wider objectives.

Q.23. *Do you agree with our brief assessment of current policy on community regeneration?*

We agree that responsibilities are being devolved to local authorities and their local Community Planning partners, and that the National Performance Framework includes a number of national

outcomes that are directly relevant (e.g. ensuring that we have “strong, resilient and supportive communities” and that we live in “well designed, sustainable places”). We also agree that there is greater potential in Community Planning processes, and that the long-term involvement of local residents in the improvement of their homes and neighbourhoods is critical to any success.

We further agree that the role of ‘housing’ in delivering community regeneration can better align with community engagement to ensure wider wellbeing; e.g. through ensuring that the right neighbourhood partnerships and funding streams can be put in place.

Q.24. *Do you agree with our suggestions for further action in the area of community regeneration?*

We agree that regeneration initiatives should be targeted to deliver place-specific actions based on desired outcomes, and that these should be agreed with local councils, partners and communities. We also agree that a monitoring programme should measure success against stated outcomes and objectives.

We believe there is greater potential in Community Planning processes, and that there should be a closer alignment between community and spatial planning.

We agree with initiatives to support local communities in the co-design and delivery of local services; to be successful we suggest this requires appropriate resourcing.

We believe that lessons can be learned from the way a ‘bottom-up’ approach to community regeneration has operated, driven by and for the benefit of the community; how collective working has informed the testing and formulation of commonly held visions; and how this has informed decision making about investment.

Q.25. *Do you have other suggestions which we have not mentioned in relation to community regeneration?*

We suggest stronger corporate working within and across organisations to overcome silo thinking, align budgets and work towards delivering place based outcomes to secure wider wellbeing benefits. We suggest that the desire to link community and spatial planning, and encompass the Community Empowerment agenda could provide a stimulus to drive this aspect of community regeneration.

Section 8: Do we need a more robust private rented sector?

Q.26. *Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?*

We agree on the need for a more effective private rented sector as part of a balanced approach to meeting housing needs (as is the case in other European countries), and agree with the observation that there is a need for investment in the sector by ‘institutional investors’ who have an interest in achieving longer term benefits.

Q.27. *Do you agree with our brief assessment of current policy on the private rented sector?*

No comment

Q.28. *Do you agree with our suggestions for further action in the private rented sector?*

No comment

Q.29. *Do you have other suggestions which we have not mentioned in relation to the private rented sector?*

Rather than being purely guided by 'market forces', we believe the private rented sector needs to operate in the context of recognising a role and responsibility as part of delivering a bigger picture to do the right thing to secure wider health and wellbeing benefits, rather than driven by narrow considerations around financing.

Do you have any further comments in relation to the Commission on Housing and Wellbeing's consultation paper?

We agree with Audit Scotland's 2013 [Housing in Scotland report](#) where it states: *"Housing is important for people and communities. Well planned, good quality housing contributes to strong resilient communities and promotes economic growth. It can also have a positive impact on the quality of people's lives. If well planned, it can help prevent additional costs to public sector budgets, such as the health service."*

Good housing needs more than good housing policy: housing policy needs to be seen as part of wider social changes towards a more equal, community-centred, environmentally sustainable society; good housing policy can make an important contribution to those changes.

We believe that strong proactive planning can work with housing policy to achieve wider wellbeing benefits through setting out a vision for the future, and through 'test planning' of different options; this is unlikely to happen if planning is reactive to development enquiries.

We note that this consultation is about linkages between how housing can assist the delivery of wellbeing benefits (rather than standalone housing policy objectives); this provides a helpful steer to assess and prioritise the inclusion of appropriate actions and recommendations.

Housing has a role to create attractive environments that strengthen settlements and communities (new and existing). Wellbeing benefits are inextricably linked; social approaches to housing, promotion of strong healthy communities and care for the environment are all mutually reinforcing. Realising benefits will require strong corporate working that overcomes silo thinking and aligns budgets.

We suggest the Scottish Government may need to invest in training and skills development to help increase awareness of the issues, and possible solutions, that require broad public support. This may involve investing in new forms of capacity and collaborative processes to do things differently.

We believe there is a case to support new forms of housing delivery options that cater for flexible, small, varied, self build or community co-operative options. Such options generate benefits through establishing stronger cohesive communities that have a stronger sense of ownership and responsibility over the long term.

In summary, A+DS believes the most important considerations are:

- delivering long term wider benefits are more important than achieving short term narrow gains
- we need to think beyond housing unit numbers, to better appreciate spatial and social consequences of housing investment decisions
- decisions about housing affect people's lives: housing has a crucial role to play in delivering and leveraging wider health, wellbeing and societal benefits
- 'place' is an important starting point to focus discussion and bring together differing agendas to inform decisions about housing investment
- housing is central to delivering wider benefits when seen in terms of joined-up place based investment
- partnership and leadership are key

A+DS would welcome the opportunity to participate further in this discussion.