

Introductory comments

The Civic Trust for Wales welcomes this WDA document, as a clear statement that the Agency places design at the heart of its mission in terms of physical development across Wales. Good design is not an add-on or optional extra to be achieved only through the conventional process of development control — by which time, it is usually too late to achieve fundamental changes.

The introduction sets out worthy aims and principles, which augur well for the future. We wonder, however, whether the track record of the Agency over past years merits some critical reflection in this initiative: achievements in the past have been patchy, and we suggest that some recognition of this would give more force to the purpose and need for this new design initiative.

In the reference at para. 1.4 to promoting better design, we suggest that our comparators should be drawn not just from only Welsh or British, but international. Some overseas exemplars would greatly help the guide's purpose.

Also it is welcome to see that document moves well beyond the broad “motherhood and apple-pie” sentiments about the virtues of good design, that we would all easily sign up to, and offers practical guidance regarding methods of approach to project development, that will assist the achievement of good design, from the outset.

The following comments and questions need to be taken in the context of the foregoing overall welcome and endorsement of the document.

Design advisor and panel

There is no reference to the newly formed Design Commission for Wales. Given the relatively small professional pool in Wales, from which respected advisors and panellists might come, is there any scope for a more specific working relationship between the WDA and the Commission, particularly on major projects?

In any case, we suggest there should be reference to working with the Commission in the Executive Summary, associated with the reference to working with the National Assembly.

We do not see any reference to the relationship between this proposed guidance and that of the Assembly, through its own Design TAN.

Skills and training implications

The emphasis placed on good design, and the proposals for design champions drawn from within the ranks of the WDA, imply serious challenges in terms of skills, resources, and training, within the Agency and its operational partners, such as local authorities, developers, and universities. This is an issue that needs to be addressed directly, if the praiseworthy objectives of the guidance are to be achieved on a long-term basis.

Some of these training/skills requirements will take the form of additional professional development of staff that are already trained and appointed in other fields. But we wonder whether — and this is a question not only or even primarily for the Agency — there needs to be reconsideration within the primary “built environment” disciplines — of the quality of design teaching and study from undergraduate level onwards. We would think this should be a matter of particular concern within the planning and engineering professions.

Design champions

The document suggests possible design champions would be drawn from various parts of the Agency, according to the project in hand, but in each case, there would be no automatic “match” between the skills needed for a design champion, and a current project leader within the Agency.

Design and development process, and procurement alternatives

The methods proposed appear very logical and thorough, and it would be difficult to find fault with them in general. They do, however, appear to rely on the abilities of a number of players to make their inputs as and when required. In reality, given for example, the chronic difficulties many local planning authorities face in terms of staff resources and skills, as well as financial constraints, it cannot always be possible to orchestrate project planning in an ideal way. Moreover, it needs to be recognised that projects vary in size and complexity, and this could suggest variations in approach. So we think there will need to be flexibility in detailed methodology.

Much of the scope for alteration must come, of course, through practice feedback; given adequate skills and resources and good team-working, the processes advocated would appear to be beneficial' especially for major schemes.

The only doubts that arise to us are these. Firstly, whether the approach to be adopted should not be a stereotypical one, but should be tailored to the scale and complexity of each scheme. We feel sure, that this actually happens in practice, and we would suggest that the final version should make it clear that the proposed

procedures need to be tailored to particular circumstances, rather than trying to straitjacket schemes into rigid processes.

Secondly, while we heartily support the emphasis being placed on context setting — through the progression from national policy through county/district plans, urban design and other frameworks, *etc* — we would not want creative design ideas to be stifled from the outset by an over-emphasis on ensuring that designs “fit in”! We do of course, as Civic Trust, place particular value on designs responding to local identity; all we are cautioning against is this regard for context sometimes limiting design creativity.

Welsh landscapes and townscapes and what constitutes good design?

These chapters form a substantial proportion of the whole document and make very interesting and helpful reading. But we wonder whether the ultimately practical purposes of the Guide would be assisted if these were edited and simplified.

WDA Design Strategy

We agree with the approach proposed to the achievement of good design by the Agency, and in fact, if it can be achieved and sustained year in year out, we would expect to see the Agency’s example influencing design quality in Wales generally. The crux is, of course, the ability of the Agency and its partners, to stick to this design commitment, even when there are — inevitably — short term economic or other pressures that threaten to take precedence. There is also — reverting back to our comments on skills, a crucial need that the design commitment is felt from top to bottom within the Agency.

We support the emphasis on exemplar projects, and recognise the virtues of the use of limited design competitions. We would make two points, however: firstly, should we be restricting our potential designers to “small groups of Welsh architects”? Secondly, could the Agency rules allow in some cases, the direct engagement of a particular architectural practice?

Concluding comments

We are grateful to have had the opportunity to comment on this external draft of the design guidance, and hope these comments can be taken as constructive and helpful. Viewed from the outside, the task of producing the final version in a slimmed down form, laying the accent on the practical core chapters you already have, is a daunting one. We look forward to the finished product!

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