



DESIGN  
COMMISSION  
FOR WALES  
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DYLUNIO  
CYMRU

18 May 2018

Dear Colleagues

### **National Assembly for Wales Public Accounts Committee: Enquiry Into 21<sup>st</sup> Century Schools and Education Programme**

Thank you for your invitation to provide views on the findings of the Auditor General's Report, reflections on the Welsh Government's initiative, and any general comments we may have on the 21st Century Schools and Education programme. In addition we attach a note on the role of the Design Commission for Wales which we trust is helpful.

Overall as we approach the next investment round we have the following general comments which stem from our experience as the body established by the Welsh Government to promote and scrutinise quality in the built environment:

- We generally experience a firm reluctance to consult with DCFW sufficiently early in the process to maximise value and quality.
- We regularly observe late or insufficient liaison between education departments and planning and property departments in local authorities. On more than one occasion consultation with the Commission only occurs on the brink of or just after a planning application is submitted and planning officers are new to the proposals.
- This pattern leads to insufficient examination of sustainability strategies which directly impact upon function and performance - in terms building layout, energy needs and likely performance. This has a further impact on revenue/running costs that will be borne by the school community and on the learning attainment outcomes that are directly affected by both CO2 levels and daylight which affect the learning environment.
- We have previously commented on the outline and strategic case assessments, where some fundamental design strategies such as those noted above cannot be sufficiently tested to ensure the highest environmental quality and performance which should be expected, given the scale of public investment. There are some areas that simply cannot be tested without sufficient design

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work having taken place. We have not so far been convinced that the stages in business case presentation afford this opportunity to add public value.

- Sufficient site and context analysis is lacking, as is explicit and demonstrable commitment to the objectives of the Well-being of Future Generations Act Wales and Planning Policy Wales.
- There is little or no relationship with the Welsh Government departmental officials responsible for the programme and the Design Commission for Wales.
- There are too few projects drawing on the expertise of the Commission via its Design Review Service.
- There is insufficient skill and resource available in local authorities to identify and secure the benefits of good design and a persistent, misleading assumption that good quality escalates cost.
- The Design Commission for Wales has published its findings on those projects it has been able to assess and made public all its Design Review Reports arising from direct dialogue about specific projects. These are available via our website. <https://dcfw.org/?s=School&cat=3&x=0&y=0>
- Where there is genuine collaborative and consultative ethos, some projects can be very good. This does not however characterise the approach to the programme, in our experience. Our contributions to various reviews of the programme have been managed in what is to us a very odd manner.
- The wider public benefits of all such projects should be clearly articulated and secured throughout the investment and procurement process. We are not yet convinced that this is the case. Objectives and outcomes would perhaps be a more sophisticated means of achieving this than targets and standards.
- The approach taken so far to 'standardised' elements lacks sophistication and sets minimum standards that do not in our experience drive or stimulate quality, longevity and therefore value for the public purse.
- Use of the MIM (Mutual Investment Model) as we have seen in healthcare, needs to be carried out in such a manner that the client/Government can be certain of the quality of the asset it will inherit.
- Anecdotally we are aware of head teachers who find it difficult to manage the demands of such projects, given their different skills and experience. It is our view that they need more support to do so.
- The 21<sup>st</sup> Century Schools website could be improved by greater openness and transparency as to personnel, contact for enquiries, how the whole programme is managed and communicated and how the site is updated to ensure currency. This may have changed recently and we are aware of the difficulties of maintaining such public platforms.
- The Auditor General Report did not sufficiently explore these wider qualitative elements and no contact was made by the Auditor General's team with DCFW. The Commission initiated contact following publication of the report to ensure the WAO could make contact in future reviews of this nature.

We would be pleased to share more detail of the broad concerns outlined above and to play our role in ensuring the education in estate in Wales is the best it can be in order that it is able to serve the needs of future generations.



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For and on behalf of the Board of Directors

### **Further information about the Design Commission for Wales**

The Design Commission for Wales is a company limited by guarantee (DCFW LTD), without share capital and incorporated in 2002 as a wholly owned subsidiary of the National Assembly for Wales, now Welsh Ministers, pursuant to the Government of Wales Act 2006. The Commission receives funds from the Welsh Government for its activities, carried out in pursuit of the Objects of the Company as set out in its Memorandum of Association. These are:

- *To champion high standards of design and architecture to the public and private sectors in Wales through promoting wider understanding of design issues and the importance of enhancing the built environment across all sectors, including the organisation of exhibitions, meetings, seminars and conferences.*
- *To promote design practice that is compatible with the scheme made by the National Assembly for Wales under Section 121 of the Government of Wales Act 1998 ("the Sustainable Development Scheme"), promoting best practice in energy efficiency, waste disposal and access to public transport.*
- *To promote design practice compatible with the highest standards in relation to the promotion of equality of opportunity and social inclusion.*

- *Whilst promoting excellence in prestige projects to have due regard also to the promotion of excellence in day to day developments such as residential estates and industrial units*

In addition to the company Objects the Commission responds to a number of requirements set out annually by its Sponsor department, the Planning Directorate of the Welsh Government. These are agreed annually as part of the annual planning process and reflected in DCFW's Annual Plan each year. DCFW may also respond to requirements from other Welsh Government portfolio areas, major projects or Ministerial requirements. DCFW responds to legislation and policy requirements pursuing its Objects through Client support and training; the National Design Review Service and through events, publications and networks. DCFW operates throughout Wales with all 22 Local Authorities and 3 National Parks and across private, public and third sectors.

End.