Local Government and Communities Committee
Planning (Scotland) Bill
Submission from the Glass and Glazing Federation

1. About the Glass and Glazing Federation (GGF)

- The Glass and Glazing Federation (GGF) is the main representative organisation for companies involved in all aspects of the manufacture of flat glass and products and services for all types of glazing, in commercial and domestic sectors.

- We represent companies who make, supply or fit, glass and glass related products in the UK and internationally and have approximately 500 members who can be found in over 1,500 business locations throughout the UK.

- Over half of the installations performed in the UK are carried out by our members and we are widely recognised as being the world’s leading authority within the glass and glazing industry. The GGF’s key focus is on improving the energy efficiency of households and commercial buildings.

- The GGF has a dedicated Scotland office, representing Scottish members’ views and focusing on all aspects of policy dealing with energy efficiency, the retrofitting of homes, planning regulations and skills from the Scottish Parliament.

2. Building Homes

- The GGF welcomes the opportunity to respond to the Planning (Scotland) Bill (SP Bill 23) call for evidence. As with our response to the original consultation, we understand that the Bill’s primary aim is to reform the planning system which is separate to building regulations (which would more directly affect the installations of glazing in windows and doors).

- However, with the dramatic increase in the number of homes being built, the GGF is very concerned that local authorities do not have the capacity to enforce building regulations which prohibit sub-standard glazing being installed.

- We know from our experiences that housebuilders do not always comply with building regulations, as has recently been witnessed in the case of Bovis Homes who recently issued a profit warning and saw its Chief Executive resign over a scandal where unfinished homes were sold to buyers who subsequently complained and demanded urgent repairs. In an attempt to meet housebuilding targets, Bovis clearly disregarded regulations, and it is essential enforcement stops this situation being repeated.

- The GGF welcomes that the independent review panel has recognised that there is already a wide range of powers and options available to respond to breaches of planning control, but that planning authorities are not taking enforcement action. The GGF agrees that resource constraints are limiting enforcement
activity, but would also like to highlight that enforcement action is not being taken against non-compliance with building regulations covering thermally efficient windows and doors.

- Whilst the regulations do state that glazing products must be a certain standard, the enforcement of the regulations is not currently adequate to stop sub-par products being used in window and door installations. The GGF’s Scottish members are aware of significant numbers of glazing products being sold to consumers and suppliers in Scotland which does not meet the criteria for energy efficient windows.

- The GGF believes that there is no requirement to strengthen existing enforcement powers. In line with other respondents, the Federation considers that existing enforcement powers are adequate but under-used for both planning control and building regulations.
  
  - We are therefore very keen to work with local authorities and the Scottish Government to ensure the enforcement bodies and planning inspectors have the knowledge and expertise to identify sub-standard glazing.
  
  - GGF Scotland would be keen to hold workshops and join roundtables with the Scottish Government and local authorities to make sure enforcement bodies are fully equipped and skilled to guarantee all new homes will be fitted with compliant windows and doors.

3. Permitted Development Rights

- The GGF was disappointed that the draft Bill does not include provision to increase the threshold by which planning permission is required for conservatories in Scotland. This would allow homeowners to carry out reasonable amounts of re-development on their homes, and increase the value and comfort of homes in Scotland.

- In England, homeowners must seek planning permission to build conservatories which are more than 30 sq. metres. However, in Scotland, the threshold is much lower at 8 sq. metres. This means local authorities have a backlog of cases to administer, permissions take much longer to approve and homeowners become frustrated with burdensome red tape. The GGF calls on the Scottish Government to bring the threshold in line with England, to ease the burden on local planning departments and kick start the retro-fit sector in Scotland.

We would be delighted to provide more information which may be useful for the consultation.