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THE ARCHITECTURAL
HERITAGE SOCIETY
OF SCOTLAND

*For the study and
protection of Scottish
architecture*

Gordon Mackie
Historic Scotland
Longmore House
Salisbury Place
Edinburgh EH9 1SH

08 December 2009

Dear Mr Mackie

Consultation on Historic Scotland Guidance Notes - Managing Change in the Historic Environment

The Architectural Heritage Society of Scotland (AHSS) is an independent membership-based charity that works to promote the study and protection of Scotland's historic buildings. A particular area of focus is casework and the emerging guidance is therefore of particular interest. We thus very much welcome the opportunity to comment on the Guidance Notes in their draft form.

Since its inception some 20 years ago, the Memorandum of Guidance has proven an invaluable tool to all of us who deal with the management of our historic environment. It sets out in a clear, if not altogether concise manner, the key issues which affect all stakeholders and addresses in some considerable detail how applications for consent should be approached. It has proven a useful tool not just for planning authorities and bodies such as ourselves, but also for developers inasmuch as it sets out in an unambiguous manner the alterations which will generally be acceptable when dealing with our built heritage.

That an update to the Memorandum was overdue is without doubt. We are, however, concerned about a number of significant aspects of the current draft guidance and in particular the loss of excellent – and important – advice on points of detail. A more detailed response setting these out is appended. Please note that we also concur with the comments made by the IHBC and are a signatory to the BEFS response.

Patron: HRH The Prince Charles, Duke of Rothesay KG KT GCB OM
President: The Dowager Countess of Wemyss and March

Chairman: Peter Drummond
Chief Officer: Dr Susan Buckham
Chief Officer: Audrey Dakin

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We are also concerned about the standing of the new guidance document. The Memorandum carried considerable weight, however there is a lack of clarity as to the standing of the new documents and their relative importance within the planning guidance framework. The Society fully concurs with Historic Scotland's long stated view that historic buildings can be vulnerable to inappropriate change and thus encourages Historic Scotland to further review the documents in order to ensure that these proposed replacements carry sufficient weight to ensure their effective application.

Please do not hesitate to contact us should you have any queries.
Yours sincerely

Peter Drummond
AHSS Chairman

Section 4: Consultation Questions

Background

1. *In what capacity are you involved, or have you previously been involved, with seeking advice on the Historic Built Environment (e.g. applicant, agent, amenity body, planner, etc)?*

The AHSS is an amenity body. Through our regional Case Panels the Society frequently refers to the Memorandum of Guidance in discussions with Local Authorities in determining planning applications for Conservation area Consent and Listed Building Consent.

2. *Do you think the guidance notes present Scottish Minister's advice on the Historic Environment in a clear and consistent manner?*

No. The reform of Scotland's planning system and the publication of the Scottish Historic Environment Policy (2008) require the adjustment of the advice found in the Memorandum of Guidance. However, the establishment of the Joint Working Agreement between Historic Scotland and Local Planning Authorities increases the importance of detailed guidance for planning officers working in Development Management as they will be determining the majority of planning applications affecting the historic environment without the requirement to consult Historic Scotland. Given the varying experience and qualifications of planning officers across Planning Departments it is crucial that that the base policy advice from the Scottish Government is of the highest standard and of a comprehensive nature.

The Guidance Notes do not match the rigour or detail of the Memorandum, glossing over topics that were discussed at length (i.e. Stone Cleaning). They permit a high degree of interpretation, referring to exceptions to good conservation practice but without detailing what these exceptions are. An applicant could easily exploit what amounts to a lighter approach to conservation leaving the planning officer, or reporter at public enquiry, without a sufficiently robust statutory document to counter aggressive proposals.

The Guidance Notes make insufficient reference to Historic Scotland's Technical Advice Notes and Guides for Practitioners, particularly the 'Conversion of Traditional Buildings - Application of the Scottish Building Standards'. Details that arise in pursuit of a Building Warrant may have implications for the final appearance of the building; boiler flues, vent cowls, soil vent pipes, gas pipes are the sorts of thing which are often not detailed in the application for Listed Building Consent but impact on the final appearance.

3. *What are your views on the layout and use of images of the guidance notes? It would be useful if you could consider:*

how easy the documents are to read?

are the documents accessible?

do you think the images are appropriate for the issues they illustrate?

The documents are written in a manner that is appropriate for the non-professional although they lack a glossary. There is some variance in reference to historic buildings and listed buildings. The use of 'could', 'can' and 'may' is insufficient in creating a policy document.

The creation of 14+ documents results in the replication of information and as it is likely that alterations to a historic building will require reference to more than one, retaining them in one well indexed document would be preferable. A hard copy should be available but links within a PDF do permit easy reference to other Historic Scotland documents.

The images are good in general, but require referencing within the text where appropriate. An illustrated glossary would be beneficial.

4. The 14 Guidance Notes replace guidance from the withdrawn Memorandum. What aspects of the Historic Environment should be considered for inclusion in an expanded series in the future?

The Guidance Notes should include all the topics covered in the Memorandum including Conservation Areas as it is unlikely that New Design in Historic Settings will be as comprehensive.

MANAGING CHANGE in the HISTORIC ENVIRONMENT

INTERIORS

p 2, item 4 – delete 'wherever possible' as 'should' serves as condition enough

p 3, Why are historic interiors important – insert 'and how' after 'materials help us to understand when'.

p 6, New design – 'should be subordinate to' instead of 'should not destroy'.

FIXTURES

p 2, item 3 insert 'preserve it and' after 'fixture and seek to'

p 3, para 3 To be understood as integral the fixture does not have to be physically attached to the building itself.

p 6, Lighting – lighting schemes should be sympathetic to the relative importance of the building in its relative location and historical importance.

ROOFS

p 6, Slates: include 'size' (or 'dimensions') as one of the criteria that should be matched.

p 6, Ventilation: When a roof is being re-slating, a good quality breather membrane should be laid on the sarking, under the slates. This removes the need for ventilators. Best technology for now, so should be included. If re-slating is not possible, ventilators should ideally be formed in lead, 'bird's beak' type.

p 7. when re-slating, "salvage and re-use is often possible" - this should be 'usually' possible.

WINDOWS

p 7, Ventilation: The use of ventilators in the meeting rails of sash windows requires high meeting rails as some part of the ventilator has to be 1.75m above floor level (Building Standard, Domestic 3.14.2).

p 8, Double Glazing: Slim-line double-glazed units are available that can be fitted within existing astragals without damaging their profile or depth. It may result in the loss of historic glass and the note is equivocal as to whether or not this is acceptable.

RESPONDENT INFORMATION FORM: HISTORIC SCOTLAND GUIDANCE NOTES –
MANAGING CHANGE IN THE HISTORIC ENVIRONMENT Please complete the details below
and return it with your response. This will help ensure we handle your response appropriately. Thank
you for your help.

Name: The Architectural Heritage Society of Scotland

Postal Address: The Glasite Meeting House, 33 Barony Street, Edinburgh EH3 6NX

1. Are you responding: **(please delete the line that does not relate to your situation)**

(b) **on behalf of** a group/organisation go to Q3 and then Q4

ON BEHALF OF GROUPS OR ORGANISATIONS:

3 The name and address of your organisation *will be* made available to the public (in the Scottish
Government library and/or on the Scottish Government website). Are you also content for your **response** to
be made available? **(please delete the line that does not relate to your situation)**

Yes

SHARING RESPONSES/FUTURE ENGAGEMENT

4 We will share your response internally with other Scottish Government policy teams who may be
addressing the issues you discuss. They may wish to contact you again in the future, but we require your
permission to do so. Are you content for the Scottish Government to contact you again in the future in
relation to this consultation response?

(please delete the line that does not relate to your situation)

Yes