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Historic Scotland
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Salisbury Place
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EH9 1SH
FAO Gordon Mackie

Dear Sir,

Historic Scotland Guidance Notes- Managing Change in the Historic Environment

East Renfrewshire Council (ERC) welcomes this opportunity to comment on Historic Scotland's Guidance on Managing Change in the Historic Environment.

In general the guidance seems to be pitched at a level which is inclusive and provides good general advice that will be readily understood by the general public. It provides good explanation of concepts, such as '*restoration*', '*replication*' and '*complementary additions*' and of design in general and other issues that may affect the Historic Environment. It is also presented in a way which is clear through the use of individual leaflet style chapters, which sets out the key issues on the relevant subject matter i.e. Micro-renewables, Windows etc.

However, almost as a consequence of presenting the information in a way that is readily understood, the guidance lacks more complex advice which professionals could use in the decision making process and in the development of detailed local advice/guidance for specific Listed Buildings and Conservation Areas.

Broadly speaking, the guidance is less detailed than the Memorandum. Furthermore, as a consequence of the use of terminology such as '*should*' and '*rather*', it would make it difficult to use the Guidance Notes as a reason for refusal of an application for either Planning Permission or Listed Building Consent. Reliance on the guidance would also be problematic in cases which involve persecution through the courts given the language is relatively general and vague and lacks clarity.

The language is also informal and frequently mixes up terms such as '*Historic Building*' and '*Listed Building*' and through the use of saying such as '*windows are the eyes of a building, the shopfront is the smile*'. Furthermore, each chapter on the various subjects should make it clear at the beginning whether it applies to Listed Buildings or Conservation Areas or both. This is particularly important given the levels and extent of control is different between Listed Buildings and Conservation Areas.

The guidance lacks a glossary and definitions which would be beneficial, as well as more appropriate case studies and images to provide clear guidance on what is and is not acceptable.

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The guidance would also benefit from cross reference within the guidance i.e. on the chapter on extensions cross reference on the guidance on roofs and windows should be included. This is particularly important if it is envisaged that the guidance will be distributed in an individual leaflet basis for each subject matter. This will ensure users are aware of other matters that may impact on any proposed works affecting Listed Buildings and Conservation Areas.

The greater emphasis on energy efficiency, sustainability and salvage is welcomed.

Also in the interest of inclusion, there should be clear advice within each guidance note on where a published copy can be obtained, not just electronic copies.

In relation to the particular individual chapters the Council would offer the following comments:

Accessibility

This specific chapter provides reasonable coverage of the issue. Specifically welcomed is the proviso that it may not be possible to achieve full compliance with Building Standards and accessibility in every circumstance. However, it does not make it clear what takes precedence in such cases, and in the case where accessibility is required as part of a development such as change of use whether the change of use should be refused. Examples of where exceptions from the Building Standards and access requirements are acceptable would be beneficial.

Boundaries

Paragraph titled '*What are boundary treatments?*' (page3) refers to planning powers having control over 'excessive growth' of hedges and trees. However, this is incorrect. Planning Authorities have no control over the height of trees or hedgerows. Furthermore, hedgerows in general are outwith the control of Planning Authorities even in Tree Preservation Order areas and Conservation Areas and therefore there is no control over the removal or cutting back of hedgerows.

Paragraph on 'Listed Building Consent' (page7) does not explicitly refer to walls and other boundary treatment that may require consent if proposed to be altered including partial demolition.

Demolition

'*Demolition of Listed Buildings*' paragraph (page3) mentions Listed Buildings are '*special*' as they contribute to the quality of the environment. However little is made of the economic and cultural value of Listed Buildings which should also be considered.

The Guidance does not make it clear if consent is required for demolition which affects the setting of a Listed Building. Also, no definition of what constitutes a '*reasonable*' period is provided (page5).

Extensions

Paragraph '*Extensions to Ground Plan*' (page5), should be re-titled possibly just to '*Extensions*', as extensions or additions may take place not at ground level. In general the chapter should be more explicit in advising that in some cases, it may not be possible to extend some buildings.

Advice on appropriate materials, porches, conservatories etc. seems to have been omitted from this chapter and is not covered elsewhere in the guidance.

Interiors

Key issues, point 4, states '*alterations should be protected ... wherever possible*'. It is not clear what should happen if they can't be protected. As a minimum the paragraph should explain that it is not always possible to alter the interior, including those resulting from a change of use, which may negatively impact on the interior.

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Paragraph on '*Fixtures and Fittings*' (page4), states that not all fixtures and interiors are protected by the building's Listing. However, the Listing applies to the whole building, whether included in the list description or not. The statement should be re-ordered to place more emphasis on the Listing applying to the whole building first and foremost.

The protection of fixtures and fittings during building works should apply whether a building is vacant or not. The paragraph on '*Vacant buildings*' (page7), could be open to interpretation that the need for protection only applies to vacant buildings.

Setting

Key Issues, point 1, refers to '*The development control system*', this should be re-named to '*development management*' to be in line with the recent planning legislation. Point 4 refers to an '*objective written assessment*', point 6 also refers to one. However the guidance is ambiguous over whether the developer should undertake this assessment. Furthermore, '*Assessing the Impact of New Development*' requires identification/establishment of various criteria in the assessment process. However there is no requirement or encouragement for developers to seek agreement with the Planning Authority beforehand on the areas that should be examined. Also there is no guidance on what happens if there is a difference of opinion as to the extent/nature of the assessment.

Paragraph on '*Mitigation*' should include a statement regarding it not always possible to mitigate/resolve issues adequately and as a consequence the proposal may have to be refused.

Shopfronts and Signs

'Blinds and canopies' (page5) refers to modern fixed canopy blinds often falling foul of local planning policies. The end of this sentence should be changed to read '*... conservation areas. As a consequence they should be firmly resisted.*'

The photograph at the top of page6 showing timber panelled security shutters at Cockburn Street, Edinburgh, is arguably an example contrary to the advice within the guidance regarding the creation of deadening effect through the use of external shutters as a security measure.

Roofs

Key Issues, point 6, at the end of the sentence a proviso should be added which directs any alteration or addition to roofs to take place away from public view or the main thoroughfare.

External Walls

Key Issues, point 2, ignores the fact that the historic environment includes significant numbers and examples of buildings which use other methods and materials that are not 'traditional', especially those buildings and areas dating post 1900s. Therefore the point should be reworded to read '*Where local building materials or local traditions have been used in the walls, new works should seek to maintain this wherever possible.*'

I hope that this response is of assistance to you.

Yours faithfully,



HEAD OF ROADS PLANNING AND TRANSPORTATION