



Jim MacDonald,
Historic Scotland,
Longmore House,
Salisbury Place,
Edinburgh
EH9 1SH.

19/01/2010

File ref: SM/Forward plans

Dear Mr MacDonald,

Consultation on Historic Scotland Guidance Notes – Managing Change in the Historic Environment (Con1174).

Loch Lomond and Trossachs National Park Authority (NPA) welcomes the consultation on 'Managing Change in the Historic Environment' and has the following comments, laid out specifically with regard to the consultation document:

Respondent Information

- Responding on behalf of organisation, Loch Lomond and Trossachs National Park Authority.
- The NPA is content for the response to made publicly available'
- The NPA is content for the Scottish Government to contact the NPA again in the future in relation to this consultation response.

Questionnaire

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 National Parks (Scotland) Act 2000 sets out four statutory aims for National Parks in Scotland, including its first aim 'to conserve and enhance the natural and cultural heritage of the area.' The National Park aims are to be pursued collectively, but if there is a conflict between the first aim and any of the others, the NPA must give greater weight to the first aim.

Advice on the Historic Built Environment is secured internally on planning application and planning policy matters from in house specialists, including matters relating to Listed Buildings and Conservation Areas, although the Authority also regularly consults and seeks advice from Historic Scotland, on statutory and non-statutory matters. (Archaeology advice is provided via a service level agreement with WOSAS, Perth and Kinross Heritage Trust and Stirling Council).

This response has been compiled by planners and the built heritage adviser. The built heritage advisor has previously been involved in seeking advice on the historic built environment whilst operating in the role of agents.

LOCH LOMOND & THE TROSSACHS NATIONAL PARK AUTHORITY

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Content of Guidance Notes

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

The Guidance notes are well presented and easy to read. They form very good reference documents, which highlight the diverse nature of Scotland's Built Heritage.

To ensure that they are functionally used as Guides, and not simply as technical information, it is important that there is cross-referencing within the text to the various 'Inform Guides'/relevant HS publications. This information is often contained at the rear, but would be better within the text. Those cases are as highlighted by the NPA below.

It is also felt that the *Introduction* to each Guidance Note should refer to the possible need for statutory permissions such as Planning Permission, Listed Building Consent and Building Warrant, and not left to the end of the document.

Accessibility

No comments

Boundaries

Within this section, there is no mention on the reinstatement of trees or shrubs.

Demolition

With reference to Page 7 '*Demolition should not normally begin*', it would be more appropriate to state it '*will not begin*' to remove any ambiguity.

It might also be appropriate to mention that demolition to a historic building, whether or not it is listed or in a conservation area, should be discouraged. This is pertinent to the Park at the moment as we have recently lost important structures, as they had no statutory protection. Such an alteration may encourage others to think of conversion/reuse.

Doorways

No comments

Fixtures

This would benefit from a reference to the Micro Renewable leaflets and guidance.

Extensions

This would be of greater benefit if it were to include more examples of good extensions to domestic, historic buildings within conservation areas. We appreciate that the principals are the same, but the examples illustrated within the guidance are for much larger projects. For the document to be of greater use to the general public and their agents more examples of domestic situation would be of greater benefit.

Interiors

Page 6 Historic Materials '*Replacement of....*' This was read a few times before it was understood. Suggest '*Removal of.....*' Again an emphasis on a LBC requirement for internal works to a listed building should have more of a priority at the beginning of the document, as this is something many owners are unaware of.

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Micro-Renewables

This is considered to be a really good guide, but it is recommend that you also draw on the studies carried out by Changeworks, including their excellent publication 'Renewable Heritage'.

Setting

No comments

Shop Fronts & Signs

No comments

Engineering Structures

No comments

Roofs

A brief reference is made to cast iron rainwater goods, chimneys and dormers. However, it would be appropriate to allocate a paragraph to each as they are as important to the roofscape as the material covering it. There is also no reference to the Inform guides within the text which needs to be included. A reference to the BGS and SSLG studies as well as the research carried out by Dundee University could be beneficial. It may also be appropriate to note the damage that concrete roof tiles can have on the appearance of our built heritage.

External Walls

There is similarly no reference here within the text to the Inform Guides, so notes are as above. There is also no paragraph on maintenance/repair/alteration to corrugated iron clad buildings, or to the importance of drip moulds, corncing etc which are essential in the weatherproofing of the façade.

Windows

This document gives more technical detail than any of the others, and perhaps to ensure people read the relevant technical documents the format should come more in line with the other Guides. There is also no reference to stained glass or leaded lights which form an integral part of our built heritage and should at least be mentioned within this guide, along with guidance on their repair. There is also little reference to the crittal windows and their repair, which is also essential.

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?**
The documents make for easy reading. I like that they are a brief over view that will refer you to further reading that is accessible on line. If they were to go into more detail at this stage they would simply duplicate the Inform Guide, which is unnecessary.
- **are the documents accessible?**
We assume that this refers to ease of download? Yes they are accessible.
- **do you think the images are appropriate for the issues they illustrate?**
The images provided are good. However, it is felt that more illustrations of everyday historic buildings would allow the general public to relate to them more. Although the images are of wonderful examples of architecture and design, they are possibly a bit much for the everyday householder and suggest there should be a greater mix between the grand and the everyday.

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Accessibility

This section would benefit from images of different domestic scenarios.

Boundaries

No comments

Demolition

No comments

Doorways

No comments

Fixtures

No comments.

Extensions

This section would benefit from more images of smaller, domestic properties.

Interiors

This section would benefit from more images of smaller, domestic properties and important items such as simple fireplaces and door ironmongery.

Micro-Renewables

No comments

Setting

No comments

Shop Fronts & Signs

No comments

Engineering Structures

No comments

Roofs

The referencing on this guide appears to differ. To ensure that the Inform Guides are utilised as part of this guide, it is necessary to see them referred to within the text.

External Walls

Referencing comments are as noted above.

Windows

More information and images of other forms of windows are required.

Future Guidance Notes

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 NPA would suggest possible guides on:

- Public/community buildings such as halls.
- Public fountains/sundials/statues/memorials

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- Graveyards
- Ruins
- Noise pollution
- Streetscapes/interpretation

Please note that this is an officer response. A report outlining the response will be reported to the Authority's Planning & Access Committee on the 18th January, 2010. If there is any material change to the Authority's position as a result we will advise. Please do not hesitate to contact me directly on 01389 727760 if you wish to discuss the comments further.

Yours sincerely,

Stuart Mearns

Forward Planning Manager

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