

Delayed Office Opening for Employee Training

This Office will be closed from 8.45am – 11.00am on the 1st Thursday of each month

Historic Scotland: by email

Planning

Head of Service Roland Bean

Pullar House 35 Kinnoull Street
Perth PH1 5GD

Contact Rachel Haworth
Direct Dial (01738) 475357
RLHaworth@pkc.gov.uk

Our ref T101/1

Your ref *

Date 7 December 2009

Dear Sir,

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

Thank you for the opportunity to comment on this important new series of guidance notes. In general we welcome the series and the opportunity to update and rationalise the detailed advice contained in the Memorandum of Guidance. The general approach of the notes appears positive and constructive in emphasis whilst retaining the robustness of the Memorandum. Valuable new guidance is added on areas omitted from the Memorandum such as Setting and Micro-renewables. The format and layout seem consistent and logical, while the multiple title approach and online format should prove more accessible than the old, single volume for easy reference and for future amendment/addition to the series. The illustrations and captions are generally useful and help the notes to remain succinct and interesting to read. The use of illustrations could be strengthened further by the development of, for example, an online source of best practice examples. Carefully chosen negative examples can also sometimes be useful.

We would recommend consideration should be given in future to further guidance on the following areas:

(Internal) Fixtures and Fittings – equivalent to Memorandum section 2.1.3 and 2.1.4;

Non-Habitable Structures (ie. as distinct from Engineering Structures, as per Memorandum 9.3.0-9.6.1, including garden and landscape features, public realm/streetscape, graveyards and monuments etc.);

Curtilage (Memorandum 8.0.0) and

Enabling Development (expanding upon Memorandum 8.4.0).

We would also recommend reference is maintained to the Glossary contained in Appendix 3 of the Memorandum, perhaps as a separate document within the list of guidance notes, or a link to an existing on-line glossary, as not every user who consults the guidance will be familiar with some of the specialised terms used.

More detailed comments on each individual title are provided as an annex to this letter.

Yours faithfully

Rachel Haworth
Conservation Officer (Design)

Managing Change in the Historic Environment: Detailed comments on individual titles

Accessibility

p.9, 'Design and Access Statements': more advice on the recommended principles of a design and access statement would be very helpful, for example, the need for the document to discuss context, justification for alterations, investigation of alternatives, etc.

Boundaries

p.3, 'What are boundary treatments?': It should be noted that boundary structures also often form part of the curtilage of listed buildings and are therefore covered by their listed status.

p.5, Photograph column: the photographs shown on page 3 would be better displayed here and relate better to the text.

p.6, 'Maintenance': a link to the Inform guide on Maintenance of Iron Gates and Railings would be useful here.

The issue of car parking in garden ground and the resultant erosion of boundary structures should be mentioned, as per Memorandum 1.8.1, as this is a very common issue affecting historic boundaries.

Demolition

p.5, 'Importance of the Building' and 'Condition of the Building' take no account of deterioration in condition or significance which may have occurred as a result of deliberate neglect. It would be extremely useful from the point of view of practitioners having to consider these arguments if it were made explicit in the guidance that the weight accorded to these factors would have to be reduced if there were evidence of deliberate neglect for the purposes of justifying demolition. The statutory powers relating to Urgent Works and Repairs Notices could also usefully be mentioned here.

p.7, Paragraph beginning, "Demolition should not normally begin..." should explain the reasons behind this statement, ie. that gap sites could be harmful to the character of the area if allowed to lie undeveloped for a significant time between demolition and redevelopment.

Doorways

p.5, 'Replacement': it is suggested that the last paragraph should mention that integral fanlights (or 'Carolina doors') should not normally be used.

p.6, 'New doorways': the advice here should include that it is important that the original symmetry of the building's elevation is not compromised.

p.7, 'Colour': it should be mentioned that other finishes, such as wood stain or varnish, are not usually appropriate.

Engineering Structures

p.7, 'Water, Gas and Power Infrastructure': no specific discussion of power-related structures is included.

Extensions

The change in emphasis from the Memorandum is welcomed, which now reinforces the importance of contextual design, including contrasting approaches.

p.5, Archaeology and layout of lang rigs: it would be useful to expand this advice to encompass historic grain and townscape patterns generally.

p.5, 'Small buildings', re. lower link block in glass: it would be helpful to provide an illustration of this point. Many examples of historic, small-scale structures are experiencing pressure for development as a result of their modest scale in relation to current living standards.

p.7, Kilncraigs Business Centre, Alloa: the glass curtain wall design is not on a secondary elevation, or subordinate in scale & form, and does not provide a deferential contrast. It is therefore unclear how this provides a useful exemplar, particularly when it has the largest coverage in photographs and therefore appears to be given disproportionate emphasis.

Fixtures

p.5, 'Siting of new fixtures': the final sentence appears to be a slight change in emphasis from that of the Memorandum, which recommended fixing into masonry joints as a general rule. Both approaches could still be appropriate depending on the circumstances, and it is recommended both are mentioned.

p.6, 'Banners': it is recommended that the wording is amended to: "Banners can be fixed to listed buildings if the means of attachment does not damage, and the banner does not obscure, any architectural details."

Interiors

p.4, 'Fixtures and fittings': the guidance indicates that professional guidance in legal precedent should be sought where necessary. However more guidance could usefully be provided on this, such as a brief outline of the issues to be considered and photo examples of objects often regarded as fixtures and fittings. Alternatively, a separate guidance document on this subject may be considered appropriate.

p.5, 'Sub-division and amalgamation of spaces': the Memorandum (2.1.1-2.1.2) contained more detailed guidance on this matter and this should be amplified, particularly in regard to the desirability of concentrating changes in areas of secondary importance, and the importance of the entrance hall, main stair and principal apartments, etc.

p.6, 'Historic materials': original floors and joinery should be mentioned.

Structural works: this should be explained further, as per the Memorandum 2.2.2-2.2.3.

Micro-Renewables

p.8, 'Cumulative effects': it is recommended that this paragraph is strengthened as there is good reason to consider cumulative effects in many scenarios, whether the local authority has a specific policy or not. Alternative wording is recommended, such as "Local authorities should consider the potential incremental and cumulative effects of micro-

renewable developments on the historic environment. They may consider it appropriate to produce specific policies or guidance for significant groups of historic buildings or places”

Roofs

p.5, ‘Significance of different parts of the roof’: it would be useful if the point regarding interest in the underlying roof structure could be expanded upon with some written text of essential principles or some more photographic examples.

‘General principles for repairs and alterations’: this section has diluted the detailed advice of the Memorandum and we suggest that there should be separate items for Thatch, Pantiles, Chimneys and Associated Masonry Details (particularly Memorandum paragraphs 1.5.5-1.5.7, 1.5.12, 1.5.13) as these are critical elements of traditional roofs in many areas and are vulnerable to erosion.

Setting

p.2, Issue 4 does not specify who is expected to prepare the written assessment of impact (applicant, local authority etc).

Shopfronts and signs

p.4, Gardner’s Warehouse: this photo does not demonstrate the point made about the new and old lettering on the building, as this cannot be seen in the illustration.

p.4/5, ‘Conservation of historic fabric that forms part of the character of the building’: The following advice from the Memorandum (1.2.12) should be incorporated here: “Only in cases where sufficient evidence survives to enable the restoration of an earlier, even finer frontage, whether domestic or commercial, should demolition be permitted”.

p.5: good examples of stallrisers should include patent glass block systems such as British Luxfer Prism.

p.6, ‘Security’: more detail could be provided regarding sympathetic alternatives to internal and external shutters.

p.7-8, ‘Consents’ and ‘Further information and advice’: should mention the need for advertisement consent for some signage, along with other forms of consent.

Further advice could be provided (here or in the Demolition guidance) relating to the demolition of otherwise plain buildings containing good original shopfronts and/or interiors worthy of retention. Where demolition is granted, good quality decorative material should be salvaged and stored safely for re-use elsewhere.

Walls

p.2, Key issue no.1, “The external walls of a building are perhaps the most important single element of its character.” Walls are certainly important but this statement appears too strong. It should perhaps say ‘a key element’.

p.5, ‘General principles for alterations and repairs’: the principles should be fleshed out more: it is suggested that there should be a separate item for pointing of masonry and more added to the Harling, Paint and Cleaning sections, as the detailed advice of the Memorandum (particularly paragraphs 1.1.4, 1.1.7, 1.1.8, 1.1.10) has been seriously diluted here.

p.6, 'Paint': spelling error at "can caused".

Windows

p.6, 'Replacement': "Where there is no alternative to the replacement of historic windows..." Although mention is made of this later on in the guide, it would be useful in this section to expand on what is meant by 'no alternative' and suggested criteria to use in making this assessment.

"This should include...": it is suggested that this sentence should be amended to mention timber (or metal if appropriate) sections of the same profile and dimension, including the astragals, and that replacement sash and case windows should have the meeting rails in the same position as the original. Prominent trickle vents should also be avoided.

New window openings: the use of traditional or contextual materials for the new windows should also be mentioned.

p.7, 'Ventilation', 2nd paragraph: it is not clear how this relates to ventilation – should this not be in the 'Replacement' section above?

'Colour': An additional sentence along the lines of: 'wood stain or varnish finishes are not usually appropriate' is suggested.

p.8, 'Double-glazing': this section indicates that double-glazing can be used where it can be demonstrated that there will be no loss of serviceable historic materials and the new windows will match the originals as closely as possible. It would be useful to have some form of explanation of 'serviceable' historic materials. It goes on to say that double-glazing may be acceptable where the new sashes will contain large sheets of glass, in which case the window frames may still be serviceable? The wording of this section appears slightly inconsistent.

"It is usually difficult or impossible to install multiple small panes of double-glazing.....without increasing the thickness and profile of the astragals to a damaging degree". We understand systems are available which can install slim double-glazed units into existing joinery to replace individual panes of glass, and it would be useful to mention this.

Sustainable repair: "It is always important to consider the total energy cost of any particular proposal." Is the guidance recommending that the local planning authority should include this as a material consideration in the statutory consent process? If so, further guidance on how to assess this information would be invaluable.