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Dear Sir

Consultation on Historic England: The Adaptation of Traditional Farm Buildings: Draft Guide to Good Practice (2017); and Historic England: The Adaptive Reuse of Traditional Farm Buildings: Draft Advice Note 9 (2017)

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. IHBC welcomes the good practice advice on adaptation of traditional farm buildings and the technical guidance on their adaptation as an important resource. The two texts are aimed at a broad spectrum of readers from the planning officer down to the aspiring homeowner wishing to convert a farm building or a farmer wishing to maintain a traditional farm building

In the first draft document, a good practice guidance note, which is text only at this stage the landscape setting has greater emphasis; we note that the assessment of character and significance has been reintegrated to the main text rather than forming an appendix as in the earlier document. The explanation of the regulatory framework

has been expanded; as has the guidance concerning advice and help has also been expanded.

The good practice advice will be of value in public enquiries or appeals but has little broader value. We assume that it will be illustrated e.g. particularly at paragraph 5.4/5.5 on farmstead layouts.

Paragraph 7.3 is of particular concern as building control officers will not be cognisant with the need to apply building regulations discreetly.

The document on adaptive reuse of traditional farm buildings, is considerably more brief than the document it replaces but this is a result of restructuring of the organization of related publications. We note that the information on the National Character framework and the regional variations and the policy framework for traditional farm buildings have been excluded.

Of the two documents that on adaptive reuse of farm buildings is the most useful as the issue of farm building conversion is ever prevalent in planning and building control situations. It is building control officers who hold sway over farm building conversions, regarding them as new build so that the inside becomes a series of white boxes. The implications can result in the decimation of the internal character of farm buildings.

There is an urgent need for building control officers to be more informed as they are the primary advisers on site on adaptation to meet the building regulations and regrettably this can result in considerable loss of character. As well as writing these advice notes Historic England (HE) should target all Building Control sector as a matter of priority with this advice. Failure to do so will mean that the present chasm between advice and practical outcomes on site will continue to produce less than satisfactory results.

Generally the discussion of the impact of building regulations needs a much more robust treatment. Building Control officers stick rigidly to the Part L(energy, B (fire) and F (ventilation) regulations when dealing with conversions with subsequent detrimental impact to significant historic fabric and overall presentation (commonly known as the white box syndrome for individual rooms). Thus phrases such as "adequate levels of energy efficiency should be incorporated discreetly" have little practical outcome. Generally BC officers treat farm building conversions as 'new build'.

The advice would be best in diagrammatic form and/or photographic form with annotations. The text needs enlivenment and illustrations would help it to be more accessible to a wider target audience to include owners and builders as well as professionals in the field. Overall whilst it is stated that there will be illustrations it is essential that these do provide much of the technical advice in diagrammatic and photographic illustrative form as well as the text. The latter will be used by planning and conservation officers, but if these documents are to be used in a practical way then the former are absolutely essential. Building personnel have little time for reading endless text.

There is considerable overlap between 1) The Adaptive Re-use of Traditional Farm Buildings, Advice Note and 2) The Adaption of Traditional Farm Buildings – Historic England Technical Guidance and it is suggested that these might be in some way combined as there is a danger that they may be read or accessed from the HE website in isolation from each other. There is also overlap between the adaption of traditional farm buildings and the text on repair and maintenance (to which a separate response has been made) in the repair aspects but after due consideration it is concluded that this is necessary as the adaptation is concerned with conversion and the repair and maintenance with maintaining the status quo but this should be explained.

It may be considered, however that there is scope for a separate document which considers all aspects of repair of traditional farm buildings whether they are being converted or maintained as working building, as the adaption text is constantly switching into repair advice which makes the 'flow' difficult to follow.

1) Detailed Comment on the Adaptation of Traditional Farm Buildings: Draft Guide to Good Practice (2017)

Paragraph 1.2: Should state that 'many' rather than 'most' traditional farm buildings are redundant for modern agricultural practices. Many traditional farm buildings are still used for agricultural purposes. To state that they are 'redundant' because they are traditional farm buildings is a sweeping generalisation.

Para.2: Traditional farmsteads: IHBC welcome the emphasis now placed on the farmstead as a whole and significance of landscape setting as often in the planning process we focus too much on the changes affecting individual buildings. However, we should be mindful that most applicants are only interested in changes to one building at a time (usually converting it to a dwelling) and do not want to consider the farmstead as a whole.

Assessment Checklist

We query how significance is attributed to agricultural buildings that are not individually Listed and question why only significance at 'national level' is considered and no mention made of local significance? The statement 'rare examples of well-preserved 18th century or earlier farm buildings' needs further explanation. What are 'constructed of rare materials'? – rare in what context? Unusual?

Paragraph 4.7: Openings: It is important for a designer to arrange an internal layout to work with the existing openings rather than trying to design from the inside out (resulting in new openings). We are unsure about the phrase 'new openings can be inserted in a semi-industrial way without resorting to making them appear historic' – It is unclear what this means and will this be explained with images? One would have thought that new openings should reflect the agricultural character of the openings bearing in mind the position and disposition of the openings on the existing building.

Paragraph 4.8: Windows and doors: Surviving window frames and doors are never retained in domestic conversions but their retention could be considered for non-habitable uses. In some cases historic doors (such as stable doors) can be retained in their original position with modern windows behind. In terms of design, new windows and doors should respect the historic function and appearance of each opening (pitching holes, hopper cow-shed windows). Uniformity of design should generally be discouraged.

Paragraph 4.10: External finishes: Emphasise that in addition to the use of soft lime-based mortars a weathered joint should be required to avoid smooth, strap pointing.

Paragraph 4.21: Heating: Masonry chimneys are rarely appropriate on farm buildings and should only be considered if there is evidence of them.

Paragraph 5.2: Withdrawal of PD rights to retain the agricultural character of the building (as well as to control curtilage development and protect setting).

Paragraph 5.3: It should be emphasised that this PD is for conversion of buildings only and not rebuilding.

Paragraph 5.5: If there is any doubt about whether a structure is a curtilage building the Local Authority must be consulted for clarification. A formal revision to the List entry can be requested from Historic England.

2)Detailed Comment on The Adaption of Traditional Farm Buildings- HE Technical Guidance.

Paragraph 4.2 – Setting – Stronger advice on the inevitable division of the environs of farm buildings to effect individual ownership, is needed here. Most developers cannot resist the need to provide privacy in order to boost sales, and install garden fences of all varieties, that immediately destroy the integrity of the group value in the farmyard scene. Again strong diagrammatic advice is needed here.

Paragraphs 4.7 and 4.8 and 4.9 and 4.13– Openings, Glazing, Rooflights and Windows – Introduction of light is a major issue in buildings designed to be particularly dark to protect crops from degradation and to promote fattening of cows etc. This needs good diagrammatic illustration of various options for doors, window apertures and roofs that are innovative and respect significance. This was being attempted in Shropshire in the early 1980s (A Guide to Converting Farm Buildings) and much of this is still valid, as are numerous other such advice leaflets written by Local Authorities over the last thirty years.

It is essential that all this advice is considerably enhanced by illustration. Some surviving farm windows need to be retained in areas of the building where this might be possible, for instance in a toilet where a former hit and miss window could be retained by glazing internally to achieve weather protection. In all areas consideration should be given to the retention of pegged heavy wood door and window frames. These are what characterises farm building construction together with shutters and their ever increasing loss, in favour of standard off the peg joinery, is a matter of concern and needs to be addressed here.

On the question of rooflights (Paragraph 4.13) it is a matter of concern that an implied ban is being promulgated. Their use is often vital to release light into areas where otherwise the whole integrity of the walling and roof may need to otherwise compromised without their use. Correctly designed and positioned rooflights can mean the difference between unhealthy living in dark spaces and healthy living in light open spaces. The Conservation Rooflight is a boon in such situations and should not be derided but rather promoted here. Sunpipes, also correctly and discreetly positioned on inner slopes can also be useful in this respect. Rooflights are not completely unknown in their original form on traditional farm buildings although they tend to be later. The practice of using glazed tiles, could perhaps be emulated in a

conversion if a way can be found to introducing secondary glazing beneath to meet the requirements of energy conservation.

Paragraph 4.9- The instruction to position window frames well forward in weatherboarded buildings needs further explanation and is at present inexplicable. All windows and doors should normally be recessed within openings unless there is a very good reason for doing otherwise.

Extensions 4.25- Is this paragraph contradictory? It is stated that extensions compromise character (it should also perhaps be stated that extensions confuse the archaeology – the human message that the building conveys) but it is also stated that extensions can help to protect the significance of buildings too sensitive for intensive adaptive re-use. Perhaps it should say 'in exceptional circumstances extensions may help to protect significance provided that they do not compromise the archaeology of the building'.

Dampness- The use of the French Drain is fundamental in farm building conversions and this cannot be over-emphasised in this section. Farm Buildings are invariably constructed of a number of different materials, if they are of any antiquity other than the standard 19thC brick or stone ranges. These materials, with their individual porosities (density and pore size) are not receptive to injection courses, and are heavily reliant on the whole building platform being drained. A detailed discussion and illustration of a French drain in this text is thus essential.

Roofing – The inevitable loss of haired lime mortar torching needs to be specifically alluded to with encouragement to retain it in say 'cold roof' construction, or in non-habitable areas.

Paragraph 4.12- New Roofs- A common problem frequently encountered is the builder's desire to dispose of old trusses (be they 17thC A frames or 19th C king or queen post trusses in cowhouses), and to replace them with modern gang nailed trusses, simply to achieve head room (also for ease of roof cladding). This is devastating for farm building conversions and advice needs to be firm on this aspect, for example ways should be shown of illustrating how head room can be achieved by e.g. split staircases either side of a truss. Again good illustrations are needed here of various methodologies for achieving headroom. The phrase included in the text in the advice note "Adaptation will often require a new roof" should therefore be omitted as it served to encourage this particularly devastating situation.

Rainwater goods- Some particularly heavy duty plastic examples designed to emulate cast iron may be feasible. They are specifically made by some firms for this purpose.

Paragraph 4.14- Subdivision- again good illustrative diagrams showing innovative scenarios are needed here.

Paragraphs 4.16 and 4.23. – The whole aspect of thermal upgrading is the chief perpetrator of character destruction (the creation of white formless boxes internally) and needs to be robustly dealt with here. Detailed advice is needed on how to avoid this e.g trading increased insulation in walls and floors to meet the SAP rating whilst leaving unplastered walls in their original form. Building Control officers have their rigorous agenda which has little sympathy with buildings performing naturally. The same applies to floors. Referring to other advice notes is not helpful here. Building Contractors rarely have the time and refer only to what they have been instructed to do by the Building Control Officer.

Paragraph 4.19 – fire protection –Ditto

Paragraph 4.21- Masonry chimneys are hardly ever appropriate unless there is clear evidence of an existing chimney in a former tackroom or animal feed preparation area, or area housing a former stationary steam engine (both former spaces are unlikely to commend themselves for every-day living for humans on the grounds of being rather small). It is misleading to say they might be appropriate. They are one of the biggest single detractors for indication of a former farm building and by their over-domestic nature, confuse the archaeology of the building.

Yours sincerely

A handwritten signature in black ink, appearing to be 'JMA', written in a cursive style.

IHBC Operations Director