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Dear Gordon

**HISTORIC SCOTLAND'S CONSULTATION on Managing Change in the Historic Environment
Leaflet Series**

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.

The Scottish branch of the Institute of Historic Building Conservation (IHBC) welcomes the opportunity to respond to this consultation. Our response comprises the following:

1. Answers to Consultation Questions
2. General Comments
3. Specific Comments on each Leaflet:
 - general
 - what is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion
 - specific suggestions to improve the wording as drafted
4. Respondent Information Form

If you wish for clarification or further discussion on any matter raised by us, please contact myself initially

Yours sincerely,

Richard Cartwright
Scottish Consultations Secretary, Institute of Historic Building Conservation

Consultation Questions

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)?

1.1 IHBC Scotland's membership includes historic environment professionals in both public and private practice and also who work for amenity societies.

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

2.1 No. We have surveyed those contributing to IHBC's response and an average score out of 10 against this criterion is 4, however the range is from 2 to 7 (individual leaflet scores are given under general comments for each individual leaflet).

2.2 See also our overall General Comments, particularly on:

- use of language which is unclear
- omissions from the Memorandum, which leave a vacuum and reduce consistency

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?**

3.1 The documents are generally easy to read and quite accessible, for the layman.

3.2 Images are useful to include but all need review, better linking to the text and clearer illustration of good and bad practice. General comments given for each individual leaflet below give a rating out of 10 for the illustrations' usefulness: some eg Interiors, Micro-renewables, Setting, Engineering Structures and Walls require significant improvement.

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?

4.1 The starting point should be all areas which were covered in the Memorandum but are not yet covered in the new Managing Change series. These topics include:

1. Gardens and Designed Landscapes
2. Fire Damage
3. Specialised Building Type Guidance (Industrial, Churches, Mills, Farm Buildings, Stables)
4. Curtilage including new development within
5. Development affecting LB's and their Setting

4.2 Other new topics which would be helpful include:

6. Enabling Development
7. Buildings at Risk

General Comments on Managing Change Series

1. The IHBC is concerned that adequate time should be taken by Historic Scotland in the review of all comments received on these consultation documents, to ensure that the final products are as useful as they can be. We are aware from the concerns of our own members and those expressed at the BEFS workshop of both a lot of detailed concerns and many suggestions coming forward to improve the usefulness of these leaflets, and these must be fully assessed even if Historic Scotland's target timescale for the replacement of the Memorandum by adopted Managing Change leaflets cannot be met.
2. Whilst the MC leaflets are attractively presented and will be useful for the public/ owners, for professionals these leaflets currently represent a backward step from the Memorandum which they aim to replace, as much detailed, key content is lost, which needs to be reinstated if the leaflets are to be fit for purpose and able to be used effectively by a Planning Authority.
3. Much detailed policy guidance and advice from the Memorandum is lost. As well as a reduction in the level of detail and content of guidance on topics that are covered in the draft MC series, there will be gaps in subject areas covered (see Consultation Qn 4 above).
4. The aim to maintain the conservation standards of the Memorandum cannot be met if useful detailed guidance is lost. In particular where useful phrases from the old Memorandum have been omitted this undermines the arguments that can be put forward by a Development Management planner or Conservation Officer during the consultation stages of a planning or listed building consent application.
5. The MC series does not stress enough the need for proper guardianship of the historic environment.
6. The thinking that by aiming to be clear and concise, the MC leaflets will be better is false if important detail is lost.
7. There are many language issues to be resolved in the leaflets, which portray ambiguity in places (eg Listed Building/ historic building/ historic building in Conservation Area) and lack of teeth/ usefulness as guidance in others (eg Extensions leaflet page 5 2nd bullet 'rule' is really not much more than a statement, due to deletion of the phrase "and should be firmly refused" from the Memorandum's equivalent guidance).
8. Language is not sharp enough to be helpful in a Public Inquiry.
9. Although it has been mooted that some of the material which would be lost from the Memorandum will remain on the HS website, this will be for information only and therefore not be of the same degree of usefulness. The scope for more good and bad examples here is nonetheless welcome, also adding case law precedents
10. The dis-aggregation of the built heritage into separate topics, of the holistic approach of the Memorandum, is a retrograde step. Related content, and value, is lost eg the Introduction to Doors and Windows section of the Memorandum. The detailed indexing of the Memorandum is also very useful and its loss very regrettable.
11. There is a need for fuller cross-referencing including to other related MC leaflets, to material on the HS website, to the possible existence of LA Supplementary Guidance on the topic, and as widely as possible to other pertinent publications.
12. The addition of a Glossary would be useful.
13. A review of all images and associated text is needed, to make the images relate to and illustrate messages from the main leaflet text, including both good and bad practice examples.
14. Paragraph numbering would be useful.

ACCESSIBILITY

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 7 out of 10.
2. How appropriate and useful are the images provided: scores 9 out of 10.
3. This is a substantially new guidance leaflet & is well written, with very helpful illustrations.
4. There are however significant omissions from the previous Memo guidance as listed below, which should be reconsidered.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion (All points from Appendix 1 Section 4)

1. The DDA does not override LB legislation
2. Access improvements should seek to minimise building fabric alteration and avoid poor visual impact
3. Reversibility must not be used to justify schemes that relate poorly to the building
4. Very occasionally, full access may not be possible due to architectural quality
5. The design of the side of ramps should complement existing fabric
6. The surface of ramps should be high quality and unobtrusive
7. Dedicated parking should be provided close to the accessible entrance, with its design preserving the setting of the LB
8. Where access cannot be provided into a building being considered for a new use requiring public access, it may be appropriate to refuse to change the use

Specific suggestions to improve the wording

1. Page 2 Key Issue 1 line 4 – amend to read “ physical access **and facilities** for everyone...”
2. Key Issue 5 – delete “conservation area consent” (this will not often be involved whereas planning permission will ,and possibly other consents eg Building Standards)
3. Page 3 BACKGROUND 3rd para last line – amend to read “harming the significance **or special character** of the historic building or place.”
4. Page 4 UNDERSTANDING THE NEEDS OF USERS Para 2 line 2 – add to end of the sentence: “**or lack of facilities.**”
5. Page 6 half way down, 2nd last para under General – amend to read: “**Very occasionally**, temporary means of overcoming an obstacle might be appropriate, **perhaps** as an interim measure ~~until a long term solution is found.~~”
6. Page 9 MAINTENANCE AND REVIEW –last 2 lines amend to read: “user patterns may alter and technology may ~~render~~ **offer solutions** to previously insurmountable obstacles ~~obsolete.~~”
7. Page 9 LISTED BUILDING CONSENT 2nd para line 3 typo - ~~work~~**wall**

BOUNDARIES

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 6 out of 10.
2. How appropriate and useful are the images provided: scores 7 out of 10.
3. Other suggestions for illustrations include a better one showing the extent of country house estate walls and one showing walls containing old building features such as blocked windows, doors or arches with suggestion of retaining the interest these have. Some illustrations of copes would also be useful.
4. Photos: A photo of a wall with historic building features within it would be helpful. Good examples in Inveresk village East Lothian.
5. The leaflet is informative and well illustrated but lacks some of the clear guidance to the Local Planning Authority that was in the Memorandum of Guidance, preferring instead a more general approach, requiring more detailed consideration by the local authority in taking a decision on a boundary feature from first principles, whereas the Memorandum cut to the chase and gave clearer instruction. A good example is where the Memorandum stated that, '*the loss of large lengths of boundary wall in towns ...should be firmly resisted*'. This was useful in dealing with developers as the advice could be pointed to in black and white. If the 'consistent advice' is that 'alterations to boundaries should protect character' then it is so basic as to almost be not worth having.
6. The new leaflet is welcome in that it is a single reference point for advice regarding Boundary treatment whereas the Memorandum had references to boundaries in different sections.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. Memorandum 1.8.2 has a succinct and clear first paragraph that the new leaflet takes longer to say in a more indistinct way. Reinststate:
The presence of walls, railings, gates and gate piers will often make a significant contribution to the quality of the setting to a listed building or to the streetscape character of a Conservation Area. A proposal to relocate, remove or reduce in height any of these items should be thought through very carefully as it may detract perceptibly from the quality of the building's setting or of the street in which it lies or both.
2. The Memorandum stated that, 'the loss of large lengths of boundary wall in towns ...should be firmly resisted' and this should be reinstated as it was very useful in dealing with developers.
3. Memorandum 1.8.1 is very clear in opposing the loss of garden walls to provide parking - the new leaflet fails to mention it – others will use this to their advantage to imply that this is no longer an issue and Historic Scotland sanctions the removal of walls by default. Should continue to be mentioned in similar strong terms as in the Memorandum of Guidance on listed buildings and conservation areas.
4. The Memorandum acknowledged that in some cases the architectural importance or townscape merit of the existing boundary arrangements may be such that no change is permissible. There is no obvious reason why this should be omitted in the new guidance.

Specific suggestions to improve the wording

- a. Pg2 Key Issue 2 This is weak when referring to 'associated features' - some additional definition of these is required e.g. gates; lanterns; historic planting
2. Pg2 KI4 Delete 'wherever possible'
3. Pg3 What Are Boundary Treatments? Amend 2nd sentence to say " but this is not ~~usually~~ controlled..." Amend 3rd sentence (currently wrng) to say: However, trees in Conservation Areas or those subject to specific Tree Preservation Orders are subject to control by the Planning Authority.

BOUNDARIES (continued)

4. Pg3 Why Are Boundaries Important? First sentence: Although correct, the first sentence does not have as much impact as the equivalent sentence in the Memorandum which should be reinstated:

"The presence of walls, railings, gates and gate piers will often make a significant contribution to the quality of the setting to a listed building or to the streetscape character of a Conservation Area. A proposal to relocate, remove or reduce in height any of these items should be thought through very carefully as it may detract perceptibly from the quality of the building's setting or of the street in which it lies or both."

5. Pg4 1st sentence: Change to: 'Most boundaries are functional, marking property ownership as retaining walls. Boundaries can also be decorative and some have historical. . . . rituals.' Add new sentence: 'Many present day boundary walls provide visual clues to earlier buildings and structures in the form of blocked windows, doors and other features. These can be important in understanding the historical landscape.'

6. There is no reference in the leaflet to different copes on a stone wall, some of which demonstrate regional characteristics e.g. a Galloway cope. Consider adding: 'The many different types of cope found on historic walls can demonstrate different regional characteristics to wall construction and should be respected in new or repaired walls.'

7. Material Qualities - This could also refer to walls that have been altered over time e.g. raised sometimes in brick on top of stone. Again no reference to copes.
8. Pg6 Character and interest of the boundary- The clear guidance in the Memorandum has been replaced by a bland general principle: 'Alteration or repairs to a historic boundary should protect its character'. This should be expanded to provide general advice on how to do this for example, by use of the same materials and design.
9. Second sentence: Add reference to 'cumulative effect'
10. Pg6 Maintenance - Rather than state that a co-ordinated approach to maintenance is desirable it should state that it should ensure consistency. Reference should be made to local authority powers to serve amenity notices.
11. Pg6 Alterations - Leaflet states that the design, materials and construction of alterations should seek to 'complement the original in terms of quality'. This is rather a vague statement and should be made clearer. Consider adding new sentence: 'Where alterations are made they should use the closest match of materials and be finished to present the same appearance as the original. For example in a stone wall the coursing of stone, the width and material used in its pointing and the design and spacing of any coping stone are factors that should replicate the original.'
12. The Memorandum acknowledged that in some cases the architectural importance or townscape merit of the existing arrangements may be such that no change is permissible. There is no obvious reason why this should be omitted in the new guidance.
13. Pg6 New Openings - Typo in line 2 insert 'of' after composition.
14. It is unclear how a new opening can ever be 'consistent with the existing design'. Consider revising.
15. Widening of openings- The use of the words 'impact on' rather than 'seriously diminish' as used in the memorandum water down the advice given on whether widening an entrance is acceptable or not.
16. Pg7 Rebuilding - It is common for walls to contain evidence of earlier work possibly blocked up windows, doors archways etc. These often add character to a wall and if so should be retained rather than the wall restored.
17. Pg7 Listed Building Consent - Delete 'helpful' in line 7 and add after 'technical information', 'including details of material specification'.
18. General comment: Rigg boundary walls in medieval burghs are referred to under Material Qualities. Many rigg walls are under threat from lack of maintenance or where new development is proposed. There are so many across Scotland that they might be worth a paragraph in themselves acknowledging the importance of their retention and showing examples of where they have been successfully incorporated into new development.

DEMOLITION

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 4 out of 10.
2. How appropriate and useful are the images provided: scores 5 out of 10.
3. The emphasis on the illustrations should be retention; any photos of demolished building should be replaced with more examples of buildings being reused.
4. Leaflet is generally most useful for owners/ applicants (except archaeology);
5. The approach of the leaflet is wrong, in starting each section with acceptable reasons for demolition - rather should stress reasons for retaining LB's
6. Much has been lost from the Memorandum, which changes the emphasis away from retain, restore and examine potential for sympathetic conversion before seriously considering demolition
7. Inclusion of sections on salvage, sustainability & marketing is good, also ref to CA Appraisals

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. No reference to need for demolition consent for curtilage buildings
2. para 2.10b Economic value of historic buildings & important last sentence
3. Section 2.10.C. Alternative Uses
4. Section 2.11(paragraph 1 and 2)
5. Every attempt should be made to find an alternative use Secn 2.13
6. Section 2.15 – 2.20 on new uses has been omitted
7. Site clearance needs assessed wrt CA character Secn4.30
8. Demolition treatment adjacent to a LB Secns 10.2.3-10.2.5
9. Symmetry should not be disturbed by demolition App1, 7.00
10. A largely unaltered LB should not be demolished App1, 7.00
11. Additions of real quality should be kept App1, 7.00
12. Some buildings and streets cannot accept change App1, 7.00
13. Benefits to public and community of retaining & enhancing existing environment
14. Encouragement to retain, restore & to examine potential for conversion, before recommending demolition
15. Partial demolition in a CA needs planning permission
16. Treatment of disrepair and statutory action Section 3

Specific suggestions to improve the wording

1. Add something on value of embodied energy
2. Add reference to setting of Listed Buildings
3. Partial demolition should be covered inc that it is subject to planning control
4. Page 7 archaeology section - amend to stress importance to applicants of understanding & recording
5. Add 'beyond reasonable doubt' (from Memorandum of Guidance section 2.10 Para 1) after 'the applicant is unable to justify its demolition satisfactory' (Pg 4 Controlling the Demolition of a Listed Building Para 1.
6. Add 'appropriately qualified professionals (ideally IHBC)' to line 4 of the Condition of the Building section on pg 5.
7. Add section on need for appropriately qualified professional report by applicant to LA on economic viability (Pg 5 Economic Viability).
8. Pg 7 Archaeology section - amend to stress importance to applicants of understanding existing and potential archaeology.
9. Pg 7 Recording section – amend to stress importance to applicants of understanding the need for recording.
10. Temporary mothballing should be mentioned as an option in some cases, as alternative to demolition
11. Pg 2 Key Issue 3 delete "normally"
12. Pg 3 DEMOLITION para 2 - more needed here on economic viability

DEMOLITION (contd)

13. Pg 4 top - amend to read: "LA's ~~are also able to~~ should use their *Urgent Works and Repairs Notice* statutory powers..."
14. Pg 6 Wider Public Benefits - add ref to option in these exceptional circumstances of relocating a Listed Building.
15. Pg 6 last par add to end of line 4: "by high quality design and materials."
16. The significance of understanding is not covered in the leaflet, although listed in the Key Issues
17. Pg 5 Importance of the building - ref shd be added to illegal changes to LB's and LA enforcement powers
18. Pg 2 Key Issue 2 needs strengthened wrt value of retaining LB's, inc ref to embodied energy
19. The context of groups of buildings needs coverage
20. Cross referencing to guidance on enabling development required
21. There are no references. Include reference materials on re-use options for types of historic building eg redundant churches.

DOORWAYS

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 7 out of 10.
2. How appropriate and useful are the images provided: scores 6 out of 10.
3. The Inform guide on Doors should be referred to in the introductory section as it is very helpful and has a good background piece on recent trends towards replacement doors, that could be considered for this leaflet too.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. No reference is made in the leaflet to new doorways in new small scale extensions, which was referred to in the Memorandum. This was helpful advice to a Development Management officer dealing with an extension and should be considered for reinstatement.
2. On Associated Features (page 5,) the Memorandum was quite clear that steps, platys and flyovers should always be retained. That advice is not contained within the new leaflet and should be reinstated. The Memorandum offered advice on repair to these features which is also lacking in both the leaflet and in the Inform guide.
3. On Replacement (page 5), the Memorandum phrase (1.2.2) '*Proposals to recess a door either less or more deeply within the door opening than the original should be refused*' would be more helpful to use than the phrase 'maintenance of the relationship of the door plane to the plane of the existing wall' at top of Page 6, which is confusing.
4. The Memorandum was clear that '*replacement doors which are made of hardwood with a stained or varnished finish, and those which incorporate asymmetrical elements, integral fanlights, or inappropriate glazing or panelled patterns should never be given consent*'. There is no reason to drop this advice which remains relevant.
5. The Alterations to Fixtures section on Page 7 should be expanded to include references to those items referred to in the Memorandum (1.2.3): detailing of balustrades, urns, finials, lamps.

Specific suggestions to improve the wording

1. Pg5 Replacement. The phrase 'maintenance of the relationship of the door plane to the plane of the existing wall' is confusing. The Memorandum phrase (1.2.2) '*Proposals to recess a door either less or more deeply within the door opening than the original should be refused*' would be more helpful to use.
2. The Memorandum guidance that '*replacement doors which are made of hardwood with a stained or varnished finish, and those which incorporate asymmetrical elements, integral fanlights, or inappropriate glazing or panelled patterns should never be given consent*' should be reinstated.
3. Pg6 Glazing. Final sentence: Instead of stating that where replacement is required, new work to match existing should be specified, it should state that new work to match the original specification should be specified as for example many fanlights have been replaced with a single glazed pane where once there may have been astragals and subdivision.
4. Pg6 New Doorways. No reference is made in the leaflet to new doorways in new small scale extensions which was referred to in the Memorandum. This was helpful advice to a Development Management officer dealing with an extension and should be considered for reinstatement.
5. Pg6 Converting doors to windows. To emphasise the problem that this can cause insert 'and harm' after 'disruption' in line 2.
6. Pg7 Alterations to Fixtures. This should be expanded to include references to those items referred to in the Memorandum (1.2.3): detailing of balustrades, urns, finials, lamps.
7. Pg7 Alterations to Associated Features. The Memorandum was quite clear that steps, platys and flyovers should always be retained. That advice is not contained within the new leaflet and should be reinstated. The Memorandum offered advice on repair to these features which is also lacking in both the leaflet and in the Inform guide

ENGINEERING STRUCTURES

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 3 out of 10.
2. How appropriate and useful are the images provided: scores 4 out of 10. These should be better quality, also include drawings and old photographs.
3. It would be useful at the start of the leaflet to set out at the start of the leaflet the general principle that as much original fabric as possible should be retained in any repairs.
4. There is an over-emphasis on bridges in this leaflet.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. Bridges: original items (list of examples are given) should always be retained, as should original cobbled or setted road surfaces (from Memo 9.1.0)
2. Where there is much ornamental detail, reinstatement of the original colour scheme should be encouraged (from Memo 9.1.0)
3. For timber bridges, as much as possible of the original materials should be retained (Memo 9.1.0)
4. Reinstatement of the original design of lamp standards or parapets should be sought (Memo 9.1.0)
5. Where bridge reinforcement is unavoidable, the solution of least structural and visual damage should always be sought (from Memo 9.1.0)
6. Harbour structures and fixtures more than 30 years old should be retained unless there are most compelling reasons for their removal
7. Every effort should be made to protect a listed canal building or structure which is of group value to the canal system (from Memo 9.2.0)
8. Guidance on public parks structures (from Memo 9.3.0), inc the desirability of restoring any decorative cast iron gates and railings
9. Guidance on Churchyards (from Memo 9.4.0), inc that high walls should not be reduced, or cast iron gates removed; and that the restoration of lost railings should be encouraged
10. Guidance on garden buildings and structures (from Memo 9.5.0)
11. Guidance on street furniture and surfaces (from Memo 9.6.0)

Specific suggestions to improve the wording

1. Set out the intervention framework, basic conservation theory and principles of repair, conservation and restoration.
2. Add a section on new work within the historic environment
3. Make greater reference to the unique nature of many pioneering structures in Scotland
4. Page 2 Key Issue 5 amend: "...~~such as eg an old bridge by...~~"
5. Key issue 6 Replace 'may' with should
6. Page 4 Iron and Steel line 4 ungrammatical : "So does may the...."
7. Page 5 Lamp-standards- replace last 3 words with: "should be sought when being replaced." (to reflect Memo wording)
8. Page 5 Reinforcement line 4 replace 'preferred' with "should always be sought." The intervention framework needs to be explained, emphasising basic conservation theory and principles of repair, conservation and restoration.
9. Page 6 Repairs- add to end: "and should be retained unless there are the most compelling reasons for their removal." (to reflect Memo wording at 9.2.0)
10. Page 8 CHIMNEYS AND TALL STRUCTURES- this needs to be reworded in order to provide guidance of practical use

EXTERNAL WALLS

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 3 out of 10.
2. How appropriate and useful are the images provided: scores 4 out of 10.
3. There is a discontinuity in the series between words and pictures. Helpful, good start, but there is scope to do this with greater clarity and better information. Pictures in a glossary can be fantastically useful, though line drawings are often clearer
4. The leaflet seems completely focused on householder, and with little for the site owners, large scale developer, industrial building owner
5. There are too many omissions of detailed information in comparison to existing guidance in the Memorandum.
6. Although the paragraphs are brief, the vocabulary is often quite technical, and there is no glossary or explanations.
7. Lime isn't mentioned in the paragraph on harling, although limewash is, twice, and example of the type of technical vocabulary used, and detail lacking in the pursuit of brevity.
8. The link between the captioned illustrations and the text is unclear. A picture can save many tedious descriptive words – but captioning must enable the viewer to relate what is shown to a context or point being made.
9. Consents are mentioned, again as an apparent afterthought, on the penultimate page of the guidance. No gentle pushing of the guardianship role, the rights and responsibilities angle of listed building ownership, or of consequences.
10. The leaflet should be rewritten so that it applies to unlisted historic building walls also.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. Detailed information is completely lacking. What is given 2 to 3 pages of detailed description in MG, is very typically, glossed over in general in a single paragraph in MC. For example, stone cleaning, types of materials, stone finishes, types of tooling and dressing etc
2. Areas in the MG are omitted – steps etc, rainwater goods, detailed discussion of types of windows etc.
3. Harl – good background, lots of explanation and detail in the Memorandum. MC series doesn't mention lime!!! Mentions limewash twice, but cement once, and renders twice as well. Limewash isn't explained, and the series has no glossary – perhaps a rather serious omission.
4. Stone cleaning is dealt with in some detail in the Memorandum (4 pages) , and hastened through in a short paragraph in the MC series. The detrimental effects of abrasive cleaning, and the accelerated weathering effects of most chemical cleaning, are touched upon in the Memorandum, and mentioned but in the briefest terms in MC series. Public opinion is still largely unaware of the ethics of stone weathering, and detrimental processes and interventions: surely a case for more here than less.
5. Painted walls – same story: much useful general guidance, background, in-text examples in the Memorandum. MC series, a brief paragraph.
6. Memorandum has brief paragraphs on wall materials other than stone; mass concrete, metal facades and corrugated iron cladding, vernacular constructions etc. Much more again, to inform and set boundaries, than the MC literature.
7. Memorandum gives pages and pages of detailed guidance on steps plats and flyovers, shopfronts, external flues, rainwater goods etc. All omitted in the MC series.

Specific suggestions to improve the wording

1. The key issues are quite clearly stated, and closely echo the wording of the Memorandum. However, the last point of 6 is that local authorities give advice on the requirement for listed building, conservation area consents, and other permissions. The order suggests afterthought, and fails to emphasize that guardianship of listed buildings is a privilege with associated responsibilities – which are maintenance and protection.

EXTERNAL WALLS (contd)

2. Most of the issues covered in the MC guide are brief, not quite at the point of tweets, but not far off!
 3. If walls, and external elevations are central to character, create streetscape, and tell complex and intriguing stories about the buildings, then this guide needs to educate and engage the reader with scintillating detail and critical facts, which will allow them to look with fresh appreciation, and enable them to make informed decisions about the(ir) historic built environment.
 4. Broad general background on materials does seem basic and helpful, no matter how many Inform guides there are, or how closely this text appears to be similar. The Inform Guides serve as maintenance tuition: this series is about the legislative framework set up to protect the historic built environment. It is irritating to get half way through a document and be referred while reading a paper copy, to a link to another quite separate document, that my fingers on the ink cannot click. I imagine the lay readers/owners for whom these guides appear to be intended, may share this point of view.
 5. The MC series omits specific paragraphs on window and door openings, dealing partially with the issue through illustrations. The general section on new openings should be expanded and include the premise that new openings should often not be allowed. More detailed guidance in the MC series would be useful for planners and LA staff on advising applicants.
 6. Reference to the use of reconstituted stone and the circumstances when this may be acceptable would be helpful.
 7. An illustrated glossary is a critical omission, and if a simple one specific to each subject cannot be added to each leaflet, it would be better to have a cross referenced one, relating to all the MC series, and Inform guides, produced.
8. Detailed text improvement suggestions follow:
1. Pg2 Key Issue 1 1st sentence amend to read: “an important element in defining its character.”
 2. Pg3 KI3 line 2 add “repair” to start of line
 3. Pg 2 KI4 amend to read: “Where there is obvious or archaeological evidence of blocked openings or phases, this should be...”
 4. Pg3 WHY ARE HISTORIC EXTERNAL WALLS IMPORTANT? Line 1 change ‘usually’ to “often”
 5. Pg4 Earth and clay- ad to end: “Such buildings are extremely rare.”
 6. Pg4 Brick – add to end: “but remains an alien feature in many Scottish contexts.”
 7. Pg 5- add section, before Other Materials, specifically on **Timber**
 8. Pg5 Alterations- last sentence is not clear enough
 9. Pg5 New openings- penultimate sentence, add “alarm boxes”
 10. Pg6 Façade retention last line change ‘can’ to “should.”
 11. Pg6 Harling- ad to end of 1st sentence “and locality.” Line 5 delete ‘and its boundaries’
 12. Pg6 Paint last line add “guided by expert advice”
 13. Pg6 Indenting- add to end of para: “Petrographic analysis should be employed in most sensitive situations.”
 14. Pg7 Sculpture- advice needs to be clearer
 15. Pg7 Cleaning- amend 1st sentence to read: “The patina that materials acquire through age and weathering is an important part of the character and appearance of a wall.”

EXTENSIONS

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 7 out of 10.
2. How appropriate and useful are the images provided: scores 7 out of 10.
3. The leaflet would benefit from the following: Note of category of listing on examples, I suspect that most of the illustrations are cat A or B. Two large illustrations used on Kilncraigs (a good scheme), but it would be useful to have more examples of smaller scale interventions – representing what planning staff have to deal with on a daily basis rather than having a preponderance of “trophy” examples.
4. The leaflet needs to be clearer on when it is dealing with historic and when listed buildings.
5. Overall, fair coverage of the topic. The original section in the memorandum is entitled “Additions and Extensions” and this might be a better all-encompassing title, certain sections need beefing up.
6. It is useful to see that contextual design is used as an umbrella to define broadly 5 types of addition / extension.
7. A wider range of examples would be helpful – could there be a link to an on-line library resource of photos of a range of completed works to a range of building types.
8. Whilst there is a section on Small Buildings, this is very short and yet probably these small buildings are the ones that regularly are to be dealt with as householder applications and also critically may the extensions that are covered by the proposed “removal of duty to notify”.
9. Porches and conservatories form a sizeable chunk of this work and should be included.
10. Addition of a short section dealing with economic justification arguments for larger scale extensions would be helpful.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. Specific sections (@1.4.0) on porches, verandahs and conservatories
2. Additions and Extension are covered @ 6.0
3. Closes and courts should not be infilled, built over or blocked off (6.0)
4. An extension which would unbalance a symmetrical elevation should be firmly refused (6.0)
5. Fire escape stairs should not result in the loss of any good detail (6.0)

Specific suggestions to improve the wording

1. Pg1 KEY ISSUE 1 - Is this document aimed at only listed buildings or is it historic buildings??? The phrase is not interchangeable.
2. Pg1 KI2 'subordinate' – examples in leaflet would be useful
3. Pg3 INTRODUCTION: @para 2, the principles also apply to extensions to buildings in conservation areas as well as just for listed buildings.
4. Pg3 If there is a hyperlink indicated for Scheduled Monuments: Guidance for Owners, Occupiers and Land Managers, then there should be a parallel link to “Guide to the Protection of Scotland's Listed Buildings – What listing means to Owners & Occupiers 2009”
5. Pg3 ADDITIONS TO HISTORIC BUILDINGS -1st para states “historic buildings” not just “listed buildings”, but last sentence if first para. again refers only to listed buildings.
6. Specific guidance is needed for conservatories (+sunrooms), verandas and porches – this is clearly the guidance note where this is best incorporated.
7. Add something on the sustainability benefit of extensions.
8. Pg4 CONTEXTUAL DESIGN- The benefits of a “Design Statement” should be spelt out here as this is a useful tool to allow the designer to explain the reasoning as to why he adopted a particular approach. Although under the 2006 Planning Act this is not specifically required for extensions of an existing building, the approach recommended is sound and a comment could be included that some local authorities require a design statement to be submitted as part of the supporting information to any application for an extension.
9. A further reference could be made that any application for development in a conservation area for which a design statement is submitted should refer to the relevant conservation area appraisal prepared by the local planning authority (if available).

EXTENSIONS (continued)

10. Pg4 Replication- delete last sentence of 1st para.
11. Pg5 EXTENSIONS –delete ‘TO THE GROUND PLAN’
 - Bullet3 add to end “and should be firmly refused” (*as per Memorandum 6.0.0*)
 - Bullet4 change ‘accepted’ to “acceptable” (*as per Memorandum 6.0.0*)
 - Bullet5 add to end: “,and not result in the loss of any good detail” (*as per Memorandum 6.0.0*)
12. SMALL BUILDINGS - Further examples are needed.
13. ROOF EXTENSIONS
There is a degree of duplication with the separate guidance note on Roofs – which has a section on Roof Extensions, at the very least there should be a clear reference to this parallel guidance – especially if this document is the one that DM Officers might use as the first point of reference for example, dormers.
14. Visibility: the guidance needs to be reworded so that it does not imply that any roof extension that is not seen in an important view is acceptable.
15. Amenity: The second sentence could be simplified to avoid reference to “icons”, what the sense is actually saying is that even if there have been some new taller buildings, this should not set a precedent for all buildings to be able to attain.
16. CONSENTS Whilst there is reference to LBC, surely the need for PP should also be mentioned especially for non-listed buildings in Conservation Areas.

FIXTURES

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 2 out of 10.
2. How appropriate and useful are the images provided: scores 5 out of 10.
3. The leaflet does not give detailed enough advice and will not be useful in its present form.
4. It only covers External Fixtures, but should also cover Internal Fixtures.
5. It does not cover farm or industrial building interiors sufficiently.
6. It does not come close to replacing the Memorandum in terms of useful content.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. External Plumbing and Flues very important detailed guidance (12 points) is all lost (from Memorandum Appendix 1 Section 1.3)
2. Cabling important guidance is lost (7 points) (from Sec 1.9)
3. Telecommunications installation & associated guidance is lost (9 points) (from Sec 1.10)

Specific suggestions to improve the wording

1. Pg2 Key Issue1- delete 'can' and delete 'external' if the leaflet is to be expanded accordingly
2. Pg2 KI2 amend end to read: '...external and internal fixtures.'
3. Pg2 KI3 Line 3 amend to read: "to maintain any key aspects and features, when planning the repairs or alterations." ADD to 2nd sentence: "design, composition, significance and contribution with other elements."
4. Pg2 KI6 – delete CAC as unlikely to apply.
5. Pg3 INTRO 2nd para end of line 1 - alterations to or removal of historic; 3rd para end – delete 'in legal precedent'
6. Pg3 WHY ARE EXTERNAL FEATURES IMPORTANT? 2nd sentence add: "rainwater goods, sundials, ironmongery, lighting, railings" 2nd para – move to Page 5 NEW FIXTURES
7. Pg 4 IDENTIFYING THE INTEREST – phrases 'Evidential interest' and archaeological value' do not read well here, better would be: "changes of use over time" or similar. Combine 'Evidential interest' and 'Historical interest' paras.
8. Pg4 GENERAL PRINCIPLES Amend 1st line to read: "Maintenance, repairs and alterations to historic external fixtures should generally strive to protect their..." Amend end of 2nd sentence to read: " ...streetscape or landscape setting."
9. Pg5 top Removal – explain 'dook'holes. Last sentence conflicts with advice elsewhere not to use ferrous.
10. Pg5 General line 4 replace 'repetition' with "introduction" Line 6 ...not a change..
11. Pg5 Siting of new fixtures - amend line 1 to read: "... should generally be sited to minimise impact on the architectural..."
1st para amend line 3- 4 to replace 'can often' with: "may be more likely to" 2nd
para 1st sentence amend to read: "If a new fixture is proposed.... It should either be discretely located... or refused." Amend final sentence to note that best option is often to fix into joints
12. Pg5 Telecms- amend 2nd sentence historic profile or skyline; end sentence after 'minimal.'
13. Pg6 Signage- delete 2nd sentence
14. Pg6 Flagpoles- delete this inappropriate guidance.
15. Pg 6 Banners- amend 1st sentence to say: "Banners may sometimes be fixed to LB's.... architectural details, however they should only be allowed on a temporary basis and not where they would be detrimental to the character or appearance of the LB."
16. Pg6 Bird control- penultimate line 'above principles for fixings' – not clear what this refers to
17. Pg6 Lighting – add to end of 1st sentence: "and for best effect at night."
18. Pg7 Alarm boxes line 2 'architectural composition or details.' Line 3 'more appropriate'
19. Pg6 Security cameras – line 3 '~~architectural integrity or detailing~~ character or appearance'
Line 6: 'security cameras and cabling.'
20. Pg6 Eye Bolts and Brackets - amend line 2 to read: "...should only be permitted where necessary they can be situated discretely and without damaging architectural details."

INTERIORS

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 2 out of 10.
2. How appropriate and useful are the images provided: scores 3 out of 10.
3. The photographic illustrations seem to have taken the place of in-text examples, and while interesting, they appear as afterthoughts, because they do not often make explicit links to the text. Closer syncing would help. Also clearer examples, eg, this alteration was acceptable in a B listed Georgian house, this was condemned because of inappropriate room division, or whatever, and the interior re-instated at the owner's expense.
4. Far too much of the language, both in tone and in choice of vocabulary, is vague, and the emphasis is too informal.
5. The requirement to protect their qualities as far as possible and practical is not stressed sufficiently
6. The tone is watered down in comparison to the clarity of the memorandum, in MC, language inadequately specific.
7. Far too much of the language, both in tone and in choice of vocabulary, is vague, and the emphasis is too informal.
8. Bias appears to be towards towards householders and domestic alterations, with token industrial archaeology included as illustrations

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. Opening sentence of Memorandum which states clearly: "*Listing always applies to the whole building and not merely to those elements of it or within it to which reference has been made in the descriptive list...All interior work is consequently covered by the listing.*"
2. Further, introduction to interiors states in Memorandum is titled **GENERAL PRINCIPLES AND IMPORTANCE OF INSPECTION**, suggesting the need for base line information, and proper procedures needing to be followed.

(A very watered down version of this important principle is buried on on p5 of the new guidance: The contribution of the interior to the character should be understood before considering how to alter the building. A brief description of the interest of the interior and an explanation of the impact of alterations is helpful in assessing proposed works.)

3. Safeguarding interiors during building works is not mentioned in new guidance – but fittings and fixtures are presumably at no less risk now than in the past. Fireplace theft etc, and new ways of selling, eg ebay, with vendor anonymity, mean probably greater risk than ever to historic buildings during construction phases. The tone is watered down in comparison to the clarity of the memorandum, and language is inadequately specific.

Specific suggestions to improve the wording

1. In key issues, point 4 of a total 5, says "Alterations should protect this interest wherever possible" implying an abdication of responsibility, that alterations may indeed proceed even if it means character and special interest will be compromised- a change of emphasis is required here!
2. What is missing in the friendly tone, is a reminder of the importance of guardianship, the responsibility brought about by Listed Building ownership, and the contribution of the many parts to the whole that is the rich and varied cultural landscape in Scotland.
3. Pg2 Key Issue 2 amend to read: The significance of the interior should be considered first, and any works proceed only if they can be carried out in such a way that the special characteristics of the interior will remain intact.
4. Pg2 Issue 4 change 'should' to must
5. Pg 2 Issue 5 add to end: "there can be many creative ways to achieve modernisation, eg rewiring or other necessary alterations, without compromising the qualities of the interior which contribute to its character.

INTERIORS (continued)

6. Pg3 WHY ARE HISTORIC INTERIORS IMPORTANT? Add to end: "The interior may have been adapted in the past and alterations of high quality carried out. This does not pave the way for future alterations: the character of the interior, the relationship of the elements within it and the condition of different aspects of it will all make a contribution to the character."
7. Pg4 amend end of top para: "...complement these proportions of the room as a whole."
8. Also worth adding a section here on what it is important not to do: unsympathetically divide a well proportioned room.
9. Pg 4 Decorative Schemes line 7 add "illustrative" before 'broader stylistic movements.'
10. line 9 reword "programmatic"
11. Pg 4 Fixtures and Fittings 1st para line 2 change 'enhance' to "contribute to". Also, give examples or a tighter definition of fixtures
12. Pg 4 last line- delete 'in legal precedent'
13. Pg5 Character and Interest of the building - line 3 amend: "be fully understood to alter the building, if necessary consulting LA conservation staff or other IHBC qualified professionals."
14. Pg6 line 2 amend to read "If a new opening must be created in such a location, it should be carefully.."
15. next para- jib door needs better explanation
16. Pg 6 Historic materials- historic fabric needs better definition, perhaps add more examples
17. Pg7 RECORDING Add after 3rd sentence: "
18. Amend 4th sentence "... records outstanding or exceptional buildings...."

MICRO-RENEWABLES

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 5 out of 10.
2. How appropriate and useful are the images provided: scores 4 out of 10.
3. A leaflet on micro-renewables and the historic environment is essential. This provides a basic overview of the issues for the various types of technology and historic buildings. However it lacks more detailed policy criteria setting out issues without addressing them; and has limited reference to the impact on buildings interior. It also does not consider the opportunities for micro-renewable equipment on historic structures to be combined. However does not cover opportunities to use micro-renewables to serve more than one property.
4. Comments on layout/ ease of reading (HS consulting 2a): Key Issues set out before introducing what micro-renewables are and why they are important. Section on Historic Renewable Technology – examples where these are being brought back into use using micro-renewables would be helpful.
5. The leaflet refers to factual issues without giving a HS policy view.
6. Under References, would be useful to refer to Changeworks Renewable Heritage Project.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

The Memorandum did not refer to micro-renewables.

Specific suggestions to improve the wording

1. The opportunities for sharing technology between properties are not highlighted.
2. The impact of cumulative technologies on one property is not discussed.
3. There is little focus on the impact of the technology on the buildings interior and how to minimise this.
4. Tone of leaflet is descriptive and could be clearer, eg it could be inferred that solar panels that are not visible would be acceptable.
5. The guidance referring to wind turbines should be clarified: are they unlikely to be acceptable on historic buildings due to visibility and vibration issues.
6. Reduce Section on Historic Renewable Energy Technology.
7. Impact on fabric of historic buildings not stressed sufficiently
8. Need for renewables to be discrete should be stressed
9. Light touch installation- more technical guidance required.
10. Technical fixes – how to ensure reversibility – should be addressed
11. Some technologies are a better fit for historic buildings than others
12. Impact of ground source heat pumps on below ground archaeology should be addressed
13. Key Issue 1 needs review and deletion of statement that historic buildings lend themselves to microrenewable technology.

ROOFS

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 3 out of 10.
2. How appropriate and useful are the images provided: scores 8 out of 10.
3. Overall, good coverage of the topic, however the overall tone of the document however is disappointing – it is very general and woolly to the extent that it will be of little day-to-day use by local authority practitioners and designer/developers seeking solid advice and guidance.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. Principle that where roofs, parapets, skewes, chimneyheads or dormers survive in original form, they shd be carefully preserved (from Memo App1, secn 1.5.1)
2. Early roof timberwork shd be retained & repaired wherever possible, or recorded where not (1.5.2)
3. Any roof of structural interest shd be retained if at all possible (1.5.3)
4. Roofs shd retain their original form & pitch (1.5.4)
5. Wallheads shd never be raised (1.5.4)
6. Where roofs have to be replaced, the profile & detailing of features of character shd be reproduced (1.5.4)
7. Associated masonry detail inc crowsteps, skewes shd never be removed (1.5.5)
8. Lead shd only be added to cornices if unavoidable, & the area of visibility minimised, crowsteps & skewes shd not be surface leaded (1.5.5)
9. For unlisted buildings to be demolished with good examples of decorative stonework, salvage is urged (1.5.5)
10. Chimneyheads & stacks shd always be retained, or restored to original size, with partic care to reproduce original profile of cornice & coping (1.5.6)
11. Brick chimneyheads & stacks shd neve be smooth rendered & lined out to imitate stone (1.5.6)
12. Shafted chimneyheads & stacks shd always be retained (1.5.7)
13. Chimneyheads & stacks later than mid 18th century do not look right without pots & proposals to remove them shd be discouraged
14. A pantiled roof shd not be replaced by slates (unless evidence it was originally slated);
15. Replacement pantiles shd be of clay, the correct profile, colour & sheen, & the eaves course detail shd be reproduced (all 1.5.13)
16. Flat Rosemary roof tile roofs of late 19th/ early 20th century shd be retained (1.5.14)
17. Glazed tiles on inter-war buildings shd be retained (1.5.15)
18. Consent shd never be given for removal of broad eaves or decorative bargeboarding (1.5.16)
19. Lead and copper visible roof features shd be retained & repaired as necessary (1.5.17)
20. Original dormers shd always be retained & repaired (1.5.18)
21. New dormers shd not make a roof ill balanced or crowded
22. Box dormers and linked dormers shd not be permitted
23. Any dormers on original cottages with none shd only be allowed at rear where unavoidable
24. Great care must be taken to ensure the design, detailing & scale of any new dormers is appropriate
25. Traditional cast iron skylights shd be retained wherever possible, with any new ones limited in size, number, profile and location, & not on principle elevations (all 1.5.18)
26. Roof vents that would seriously affect a listed building's character shd not be given consent (1.5.19)

Specific suggestions to improve the wording

1. An eaves detail section should be added
2. Reference to foreign slates should be added
3. Something on tradition of using sarking straps should be added
4. Reference to discouragement of using fascia boards should be added

ROOFS (continued)

5. Pg2 Key Issue1 amend 2nd sentence to read: “with listed buildings, listed building consent is required for works which will affect the character or external appearance of a building.”
6. Pg2 KI2 amend to read: “In planning works to a roof it is important to first understand its significance and contribution to the building’s character
7. KI4 add after ‘through’ the phrase- “retention of the original form”
8. KI5 replace ‘harm’ with “have an adverse effect”
9. KI6 add to end: “where practicable.”
10. Pg3 WHY ARE HISTORIC ROOFS IMPORTANT? Amend 1st sentence to read: “The rich variety of historic roof types across the country reflects.... period in time, and local traditions should be respected.”
11. Pg3 IDENTIFYING THE INTEREST...add to start of line 6 “a limited range of”
12. Pg4 Structure line 1 Although rarely visible... line 3 elements **fabric** survives
13. Pg5 1st line add after ‘19th century.’ “Many Lowland roofs have slates from Wales or the Lake District.”
14. Pg5 Pantiles: add to end: “ Traditional pantiles have a particular size and profile that shd always be matched in replacement or new work.”
15. Pg5 Associate Features- add after ‘chimneys’ “ridge tiles, flashings,”
16. Pg5 GENERAL PRINCIPLES Character & Interst line 1 replace ‘protect’ with “respect and maintain”
17. Pg5 Significance last line replace ‘considered’ with “ respected”
18. Pg5 Analysis- begin: “An analysis of the character...”
19. Pg5 Materials- delete ‘Wherever possible’ at start
20. Pg6 Alterations – amend start of 3rd sentence to read: “In considering whether and how to allow a roof to be altered, it is important...” and add to end of para: “by Planning Authorities.”
21. Pg6 Roof extensions –amend end of 1st sentence to read “...new work will not be detrimental to the character or appearance of the building.”
22. Pg6 Dormers & Rooflights- amend last sentence to start “Original dormers..” (*as per Memorandum 1.5.18*)
23. Pg7 Fixtures- line 1 satellite dishes. Add to end of para: “Such addition area rarely appropriate on listed buildings.”
24. Pg7 ~~LISTED BUILDING~~ **LOCAL AUTHORITY CONSENTS** Add after 1st sentence: “Planning permission may also be required for any works affecting the external appearance of a building.” And add to end of para: “The submission of samples may be required.”

SETTING

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 5 out of 10.
2. How appropriate and useful are the images provided: scores 3 out of 10. The illustrations are attractive but do not add a lot to the content or usefulness of the leaflet. Further images of urban setting situations would be helpful.
3. 6 key points from the Memorandum's guidance on this topic are lost, although the length of guidance is increased
4. Language needs revised to apply to both buildings (urban and rural) and archaeology
5. Assessment of significance is not adequately covered
6. It would be helpful to set out clearer guidance on Methodolgy and to define the parameters for setting
7. The other publications and Info & Advice sections are useful.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion (all from Memo App1 Section 1.8 or Section 10.0.0)

1. Parking areas should not damage setting/ not be in front of principal elevations
2. Surfaced areas frequently make a significant contribution to setting
3. There is a requirement to advertise development affecting the setting of a Listed Building
4. There can be an impact on setting at a considerable distance/ do not interpret setting too narrowly
5. A Listed Building is to remain the focus of its setting, with no distracting development
6. New development nearby is to respect previous building lines, to keep views open
7. Guidance on development within the cartilage of a listed building
8. Guidance on development affecting the setting of a listed building
9. Guidance on development affecting the setting (as well as character and appearance) of a Conservation Area.

Specific suggestions to improve the wording

1. Page 2 Key Issue 1- Line 1 "Setting can be **very** important to..."
Line 3/4 "The development ~~control~~ **management** system has a **key** role in"
2. Key Issue 4 - Delete last sentence as it offers no useful guidance
Line 2 under written assessment add "illustrated"
3. Page 3 WHAT IS SETTING? Last sentence – Change "broader landscape" to read "wider area" (to better apply to both buildings and landscape)
4. Add that the LA needs to define Setting in each individual case
5. Page 3/4 WHAT CONTRIBUTES TO SETTING - Add a bullet on cultural issues
6. Page 4 Stage 1 Heading - amend to read: "identify and record historic structures"
7. Page 6 Stage 3: assess the impact of a new development – line 2 change "can be" to "**is**" a material consideration
8. Page 7 A CONCLUSION section should be added

SHOPFRONTS AND SIGNS

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 5 out of 10.
2. How appropriate and useful are the images provided: scores 8 out of 10.
3. Key material from the Memorandum is lost (inc from App 1 Sec 1.7.5) as set out below
4. There are 3 areas where HS appears by subtle wording changes to be seeking to pass the responsibility (previously part of Memo guidance) to LA's: fixed canopy blinds, security measures & projecting signs.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. Memorandum guidance on fixed canopy blinds, security measures & projecting signs.

From App1 Sec 1.2.12:

2. Continuous plate glass frontages with no visual support for the front wall should be discouraged

From App 1 Sec 1.7.5 (applying to LB's and CA's)

3. Historic advert signs on LB's which add to the appearance of the building should normally be retained
4. New signs must respect architectural form and detailing. The design should complement the age and architectural style; this will involve careful choice of materials, colour and lettering
5. Major retailers standard colours and lettering will not always be appropriate
6. Wording should be limited to the proprietor and the goods/ services offered
7. Advert banners should not obscure or compromise the architecture of a building

Also 8. Reintroduce advice on the principles of painting buildings and advising not to stain timber AND SEE ALSO SECTION A OF SUGGESTED IMPROVEMENTS BELOW, where lost aspects of the Memorandum can easily be put back into the draft MC leaflet text.

Specific suggestions to improve the wording

SECTION A – SUGGESTED IMPROVEMENTS WHICH WOULD RE-INSTATE LOST MEMORANDUM POINTS

(lost from App 1 Section 1.2.12 unless stated otherwise)

1. Page 5, end of top para- add at end: "nor lost to a poorer replacement."
2. Page 5 2nd para replace 1st sentence with: "Where there is a possibility of an earlier surviving shopfront underneath, this should be investigated before proposals for changes to the shopfront are finalised."(Sec 0.0.1)
3. Page 5 5th para amend to read: "Historic shop interiors are rare and efforts should be made to keep and display any good features which survive."
4. Page 5 6th para (Signage) – add to end of 2nd sentence: "and should be retained."
5. Page 5 9th para – amend end to read: "....within conservation areas **and must be firmly discouraged**. They often fall foul of local planning policies."
6. Page 6 2nd para amend to read: "there are various appropriate shop front security measures that avoid the need for externally mounted roller shutters that are obtrusive, deaden the street scene and compromise architectural merit, and which should be refused. Alternatives such as clear security film or laminated or toughened glass, internal brick bond shutters, removable or decorative grills may be appropriate."
7. Page 6 3rd para (Other Items)- line 3 amend end of 2nd sentence to read: "... projecting signs ~~is therefore~~ **should be carefully** controlled."
8. Page 6 3rd Para (Other Items) – add to end of para: "and be unobtrusive, with new lighting added to Listed Buildings or in Conservation Areas only where there is a definite need. Fittings into stone should be minimised with any necessary fittings done into mortar where possible."
9. Page 6 last para (Living over the shop)- 1st sentence delete "which straddle two separate buildings" (*in order to agree with Memo 1.2.12 wording*)
10. Page 7 2nd para 1st sentence- add to end of 1st sentence: "and should be resisted where it would lead to a significant loss of architectural quality." (Sec 1.2.13)

SHOPFRONTS AND SIGNS (continued)

SECTION B – OTHER SUGGESTED IMPROVEMENTS

11. Page 2 Key Issue 1 amend to read: “Shops change frequently. The planning system is designed to facilitate this ~~while ensuring each shop is a good neighbour that does not have to shout for attention~~ **and manage this change in an appropriate manner.**”
12. Page 2 Key Issue 2 amend start to read: “Shops ~~that contain frontages or interiors...~~ “
13. Page 2 Key Issue 5 amend to read: “LA’s **will** give advice on the requirement for LBC, CAC ~~and~~ , **planning or** other permissions , **and may also offer design guidance.**”
14. Page 3 para 3 WHY ARE SHOPS IMPORTANT? – line 5 delete “walkable” and add to end of para: “ , **while presenting an attractive frontage in keeping with the host building.**”
15. Page 3 para 4 line 2 typo - change “within” to “with”
16. Page 3 penultimate para end of – either delete “such as the horizontal division in fish shop windows” or add an explanation
17. Page 4 GENERAL PRINCIPLES FOR ALTERATIONS intro para amend as follows: line 1 ~~that~~ **who**; line 2 ~~signal~~ **advertise** and line 5 ~~It~~ **This balance...** ; and amend end of Bullet 1 and Subhead 1 “... ~~the a~~ building;”
18. Page 4 Add wording on the need to respect the character of the host building in making any alterations
19. Page 5 Add reference to tiled exteriors and that these should not be painted over
20. Page 5 last line typo- add comma after ashlar
21. Page 7 – delete top para (this repeats from middle of page 6)
22. Page 7 last para last word typo: advertisements

WINDOWS

General Comments

1. How well does the guidance note present Scottish Minister's advice on the Historic Environment in a clear and consistent manner: scores 5 out of 10.
2. How appropriate and useful are the images provided: scores 7 out of 10.
3. Most of this leaflet is for Information only and there is very little guidance
4. 15 key points of guidance from the Memorandum have been lost.

What is missing from the Memorandum's existing guidance on the topic and should be considered for inclusion

1. As a general rule, original windows should be retained; only where repair is clearly out of the question should replacement be accepted (Memorandum App 1, Section 1.2.1)
2. Any application for replacement windows must be accompanied by detailed drawings showing that they match the originals in every respect (1.2.1)
3. Proposals to remove mullions of bipartite/ tripartite windows should never be given consent
4. External secondary glazing should always be refused (both 1.2.1)
5. Original sashes should be retained if at all possible, & original sash fittings should also be retained (1.2.4)
6. The original proportions and glazing pattern should always be respected (1.2.4)
7. No attempt should be made to standardise fenestration of differing pane sizes and astragals
8. Every effort should be made to retain or reuse original glazing (both 1.2.4)
9. The reopening of blocked windows should be encouraged where this will reinstate the intended elevation (1.2.6)
10. Guidance on Stained or Decorative Zinc-framed or Leaded Glass is lost (1.2.7)
11. Guidance on Industrial Windows & Openings is lost (1.2.8)
12. Guidance on Early Modern Metal Windows is lost (1.2.9)
13. Guidance on Window Fixtures is lost (1.2.10)
14. Any proposal which would result in a diminution of architectural quality, no matter how small, should be refused (1.2.11)
15. Proposals to use wired glass, obscured glass, louvred glass or extract fans on main elevations should be refused consent (1.2.11)

Specific suggestions to improve the wording

1. Pg2 Key Issue 5 add "where appropriate" after 'secondary glazing'
2. Pg2 KI6 amend start to read: "Double glazing ~~is~~ can be acceptable...."
3. Pg2 KI7 change 'CAC ' to "planning"
4. Pg3 Form- delete 3rd sentence/ next word 'However' Line 8 delete last word 'often'
5. Pg 4 Glazing: crown and cylinder – amend line 3 to read: "from before the Reformation." Para2 line4 "later cut and flattened..." Para3 line6 amend to read: "... sashes and slim but deep Georgian astragals becoming more popular."
6. Pg4 bottom line add ",bronze" after 'steel'
7. Pg5 Framing Materials line 3 add "educational" after domestic
8. Pg6 New window openings- add to end of 1st sentence: "but new openings may not always be appropriate."
9. Pg6 Converting windows to doors- amend 1st sentence to read: "This should generally be discouraged in LB's, but subsidiary elevations may be more suitable for work of this type."
10. Pg7 Reinstatement – end of 1st para change 'sympathetic' to "in keeping with"
11. Pg7 Security penultimate line, add after 'grilles' "or external timber shutters"
12. Pg7 Colour line 1 add after 'established' the words "by professional advice"
13. Pg8 ENERGY EFFICIENCY- add to end of 1st para: "cultural heritage and embodied energy."
14. Pg8 Thermal efficiency line 3 add after 'sashes' ",curtains" and in line 4 after 'sound insulation' the words: "where this is considered necessary can sometimes be achieved by..."
15. Pg9 Typeface on diagram is too small

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: Richard Cartwright, IHBC Scotland Consultations Secretary,

Postal Address: c/o North Lanarkshire Council, Environmental Services, Fleming House, Cumbernauld G67 1JW

1. Are you responding: **(please delete the line that does not relate to your situation)**
(b) **on behalf of a group/organisation** YES go to Q3 and then Q4

INDIVIDUALS

- 2a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government website)?
(please delete the line that does not relate to your situation)
Yes (go to 2b below)

- 2b. **Where *confidentiality is not requested***, we will make your response available to the public on the following basis **(please delete the lines that do not relate to your situation)**

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

Yes, make my response and name available, but not my address

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