

**LOCAL REVIEW BODY**

**3 AUGUST 2022**

**PLANNING APPLICATION FOR REVIEW**

**MRS DOROTHY MCMENEMIE  
PROPOSED NEW BUILD 4-STOREY BLOCK OF 4 FLATS  
13 KELLY STREET, GREENOCK (21/0243/IC)**

**Contents**

- 1. Planning Application dated 16 August 2021 together with Location, Elevation and Site Plans**
- 2. Planning Application Design Statement**
- 3. Appointed Officer's Report of Handling dated 8 December 2021**
- 4. Inverclyde Local Development Plan 2019 Policy Extracts**

**To view the Inverclyde Local Development Plan see:**

**<https://www.inverclyde.gov.uk/planning-and-the-environment/planning-policy/development-planning/ldp>**

- 5. Inverclyde Local Development Plan 2019 Map Extract**
- 6. Inverclyde Local Development Plan 2019 Supplementary Guidance on Planning Application Advice Notes Policy Extracts**
- 7. Scottish Planning Policy**
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- 12. Notice of Review Form dated 13 March 2022 with Supporting Statement from Nicholson McShane Architects**
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**Note: Inverclyde Proposed Local Development Plan 2021 has been attached to the rear of the agenda papers as supplementary content.**

- 1. PLANNING APPLICATION DATED 16 AUGUST 2021  
TOGETHER WITH LOCATION, ELEVATION AND  
SITE PLANS**





Municipal Buildings Clyde Square Greenock PA15 1LY Tel: 01475 717171 Fax: 01475 712 468 Email: devcont.planning@inverclyde.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100456458-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Type of Application

What is this application for? Please select one of the following: \*

- ☒ Application for planning permission (including changes of use and surface mineral working).
- ☐ Application for planning permission in principle.
- ☐ Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- ☐ Application for Approval of Matters specified in conditions.

## Description of Proposal

Please describe the proposal including any change of use: \* (Max 500 characters)

Proposed new build 4-storey block of 4 flats.

Is this a temporary permission? \*

☐ Yes ☒ No

If a change of use is to be included in the proposal has it already taken place?  
(Answer 'No' if there is no change of use.) \*

☐ Yes ☒ No

Has the work already been started and/or completed? \*

☒ No ☐ Yes – Started ☐ Yes - Completed

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

☐ Applicant ☒ Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Nicholson McShane Architects		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Douglas	Building Name:	Custom House
Last Name: *	Nicholson	Building Number:	1-01
Telephone Number: *	01475 325025	Address 1 (Street): *	Custom House Place
Extension Number:		Address 2:	
Mobile Number:		Town/City: *	Greenock
Fax Number:		Country: *	Scotland
		Postcode: *	PA15 1EQ
Email Address: *	consents@nicholsonmcshane.co.uk		
Is the applicant an individual or an organisation/corporate entity? *			
<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Organisation/Corporate entity			

## Applicant Details

Please enter Applicant details

Title:	Mrs	You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	
First Name: *	Dorothy	Building Number:	13
Last Name: *	McMenemie	Address 1 (Street): *	Kelly Street
Company/Organisation		Address 2:	
Telephone Number: *		Town/City: *	Greenock
Extension Number:		Country: *	Scotland
Mobile Number:		Postcode: *	PA16 8NF
Fax Number:			
Email Address: *			

## Site Address Details

Planning Authority:

Inverclyde Council

Full postal address of the site (including postcode where available):

Address 1:

13 KELLY STREET

Address 2:

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

GREENOCK

Post Code:

PA16 8NF

Please identify/describe the location of the site or sites

Northing

676605

Easting

227399

## Pre-Application Discussion

Have you discussed your proposal with the planning authority? \*

☒ Yes ☐ No

## Pre-Application Discussion Details Cont.

In what format was the feedback given? \*

☐ Meeting ☐ Telephone ☐ Letter ☒ Email

Please provide a description of the feedback you were given and the name of the officer who provided this feedback. If a processing agreement [note 1] is currently in place or if you are currently discussing a processing agreement with the planning authority, please provide details of this. (This will help the authority to deal with this application more efficiently.) \* (max 500 characters)

Pre-application consultation response

Title:

Mr

Other title:

First Name:

James

Last Name:

McColl

Correspondence Reference  
Number:

Date (dd/mm/yyyy):

16/08/2021

Note 1. A Processing agreement involves setting out the key stages involved in determining a planning application, identifying what information is required and from whom and setting timescales for the delivery of various stages of the process.



## Site Area

Please state the site area:

110.00

Please state the measurement type used:

☐

Hectares (ha)

☒

Square Metres (sq.m)

## Existing Use

Please describe the current or most recent use: \* (Max 500 characters)

Garden ground of 13 Kelly Street, Greenock

## Access and Parking

Are you proposing a new altered vehicle access to or from a public road? \*

☐

Yes

☒

No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

Are you proposing any change to public paths, public rights of way or affecting any public right of access? \*

☐

Yes

☒

No

If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site?

0

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? \*

0

Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).

## Water Supply and Drainage Arrangements

Will your proposal require new or altered water supply or drainage arrangements? \*

☒

Yes

☐

No

Are you proposing to connect to the public drainage network (eg. to an existing sewer)? \*

☒

Yes – connecting to public drainage network

☐

No – proposing to make private drainage arrangements

☐

Not Applicable – only arrangements for water supply required

Do your proposals make provision for sustainable drainage of surface water?? \*  
(e.g. SUDS arrangements) \*

☒

Yes

☐

No

Note:-

Please include details of SUDS arrangements on your plans

Selecting 'No' to the above question means that you could be in breach of Environmental legislation.

Are you proposing to connect to the public water supply network? \*

- ☒ Yes  
☐ No, using a private water supply  
☐ No connection required

If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).

## Assessment of Flood Risk

Is the site within an area of known risk of flooding? \*

☐ Yes ☒ No ☐ Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? \*

☐ Yes ☒ No ☐ Don't Know

## Trees

Are there any trees on or adjacent to the application site? \*

☐ Yes ☒ No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

## Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste (including recycling)? \*

☒ Yes ☐ No

If Yes or No, please provide further details: \* (Max 500 characters)

2 wheeled bins per flat (general waste and recycling)

## Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? \*

☒ Yes ☐ No

How many units do you propose in total? \*

4

Please provide full details of the number and types of units on the plans. Additional information may be provided in a supporting statement.

## All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? \*

☐ Yes ☒ No

## Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013) \*

☐ Yes ☒ No ☐ Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

## Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? \* ☐ Yes ☒ No

## Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? \* ☒ Yes ☐ No

Is any of the land part of an agricultural holding? \* ☐ Yes ☒ No

## Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate A

## Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Certificate A

I hereby certify that –

(1) - No person other than myself/the applicant was an owner (Any person who, in respect of any part of the land, is the owner or is the lessee under a lease thereof of which not less than 7 years remain unexpired.) of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding

Signed: Douglas Nicholson

On behalf of: Mrs Dorothy McMenemie

Date: 16/08/2021

☒ Please tick here to certify this Certificate. \*

## Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? \*

☐ Yes ☐ No ☒ Not applicable to this application

b) If this is an application for planning permission or planning permission in principle where there is a crown interest in the land, have you provided a statement to that effect? \*

☐ Yes ☐ No ☒ Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? \*

☐ Yes ☐ No ☒ Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? \*

☐ Yes ☐ No ☒ Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? \*

☐ Yes ☐ No ☒ Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? \*

☐ Yes ☐ No ☒ Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

- ☒ Site Layout Plan or Block plan.
- ☒ Elevations.
- ☒ Floor plans.
- ☐ Cross sections.
- ☐ Roof plan.
- ☐ Master Plan/Framework Plan.
- ☐ Landscape plan.
- ☒ Photographs and/or photomontages.
- ☐ Other.

If Other, please specify: \* (Max 500 characters)

Provide copies of the following documents if applicable:

A copy of an Environmental Statement. \*

☐ Yes ☒ N/A

A Design Statement or Design and Access Statement. \*

☒ Yes ☐ N/A

A Flood Risk Assessment. \*

☐ Yes ☒ N/A

A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). \*

☐ Yes ☒ N/A

Drainage/SUDS layout. \*

☐ Yes ☒ N/A

A Transport Assessment or Travel Plan

☐ Yes ☒ N/A

Contaminated Land Assessment. \*

☐ Yes ☒ N/A

Habitat Survey. \*

☐ Yes ☒ N/A

A Processing Agreement. \*

☐ Yes ☒ N/A

Other Statements (please specify). (Max 500 characters)

## Declare – For Application to Planning Authority

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mr Douglas Nicholson

Declaration Date: 16/08/2021

## Payment Details

Online payment: ICPP00001218

Payment date: 16/08/2021 15:22:00

Created: 16/08/2021 15:22





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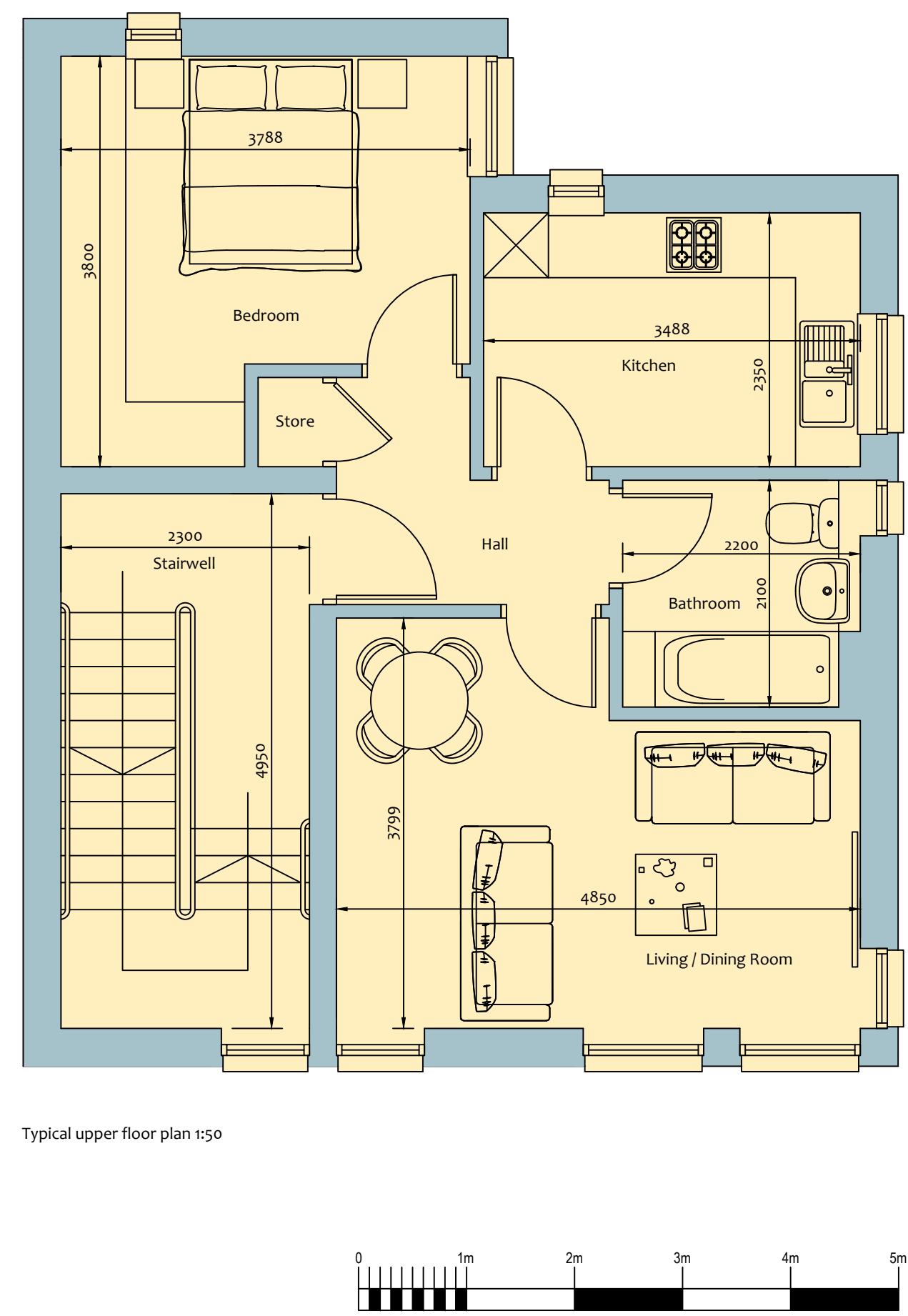
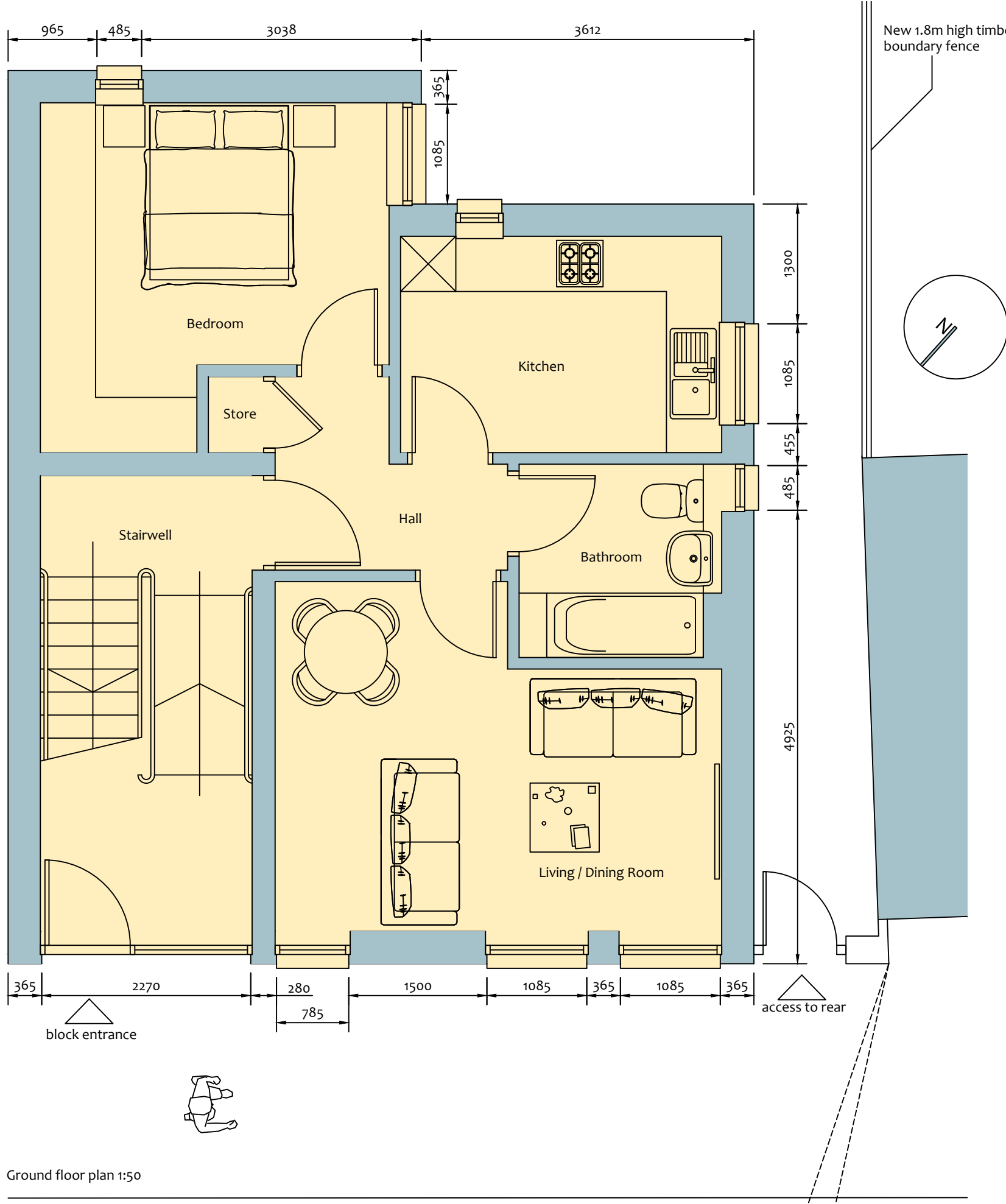
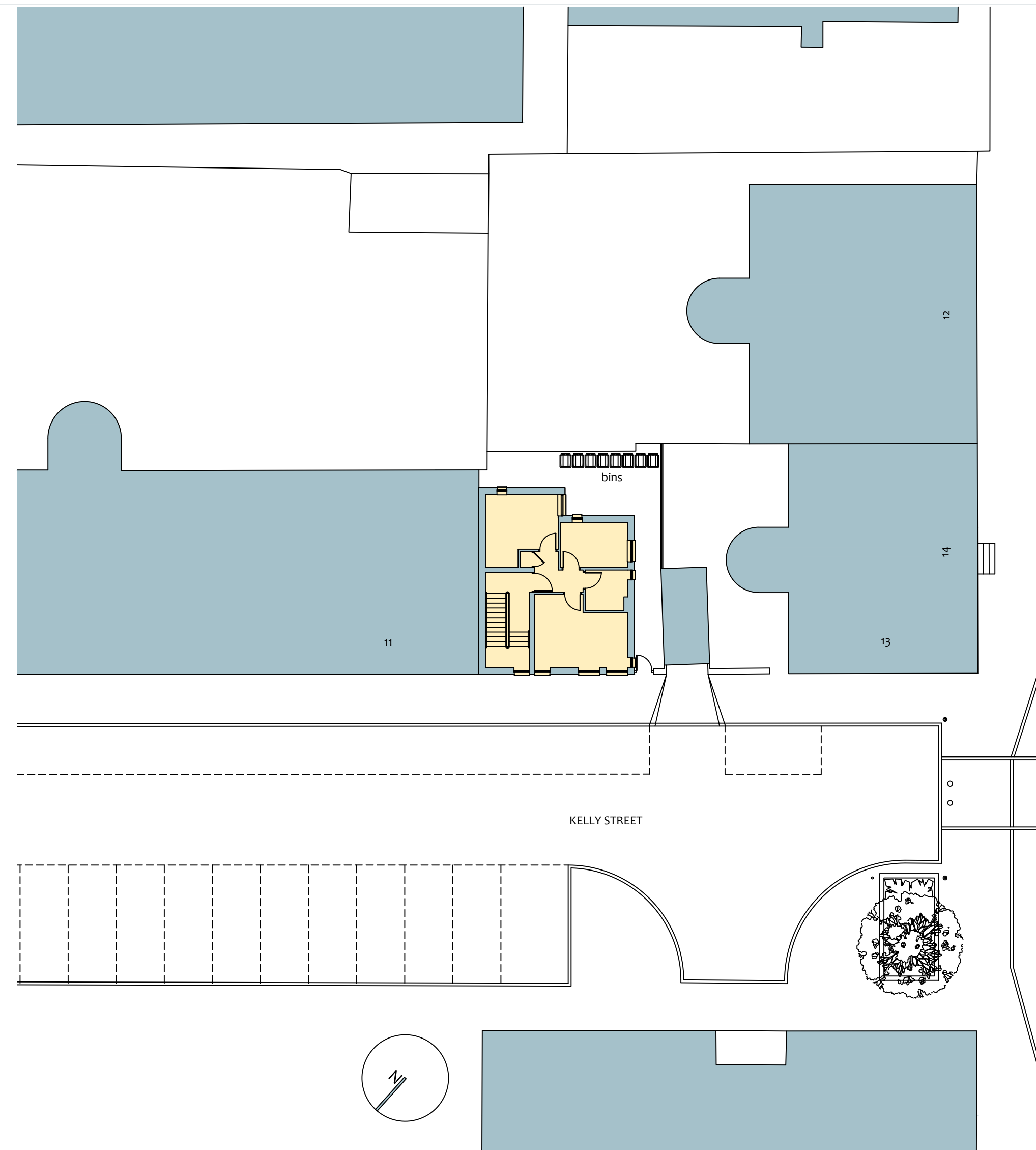
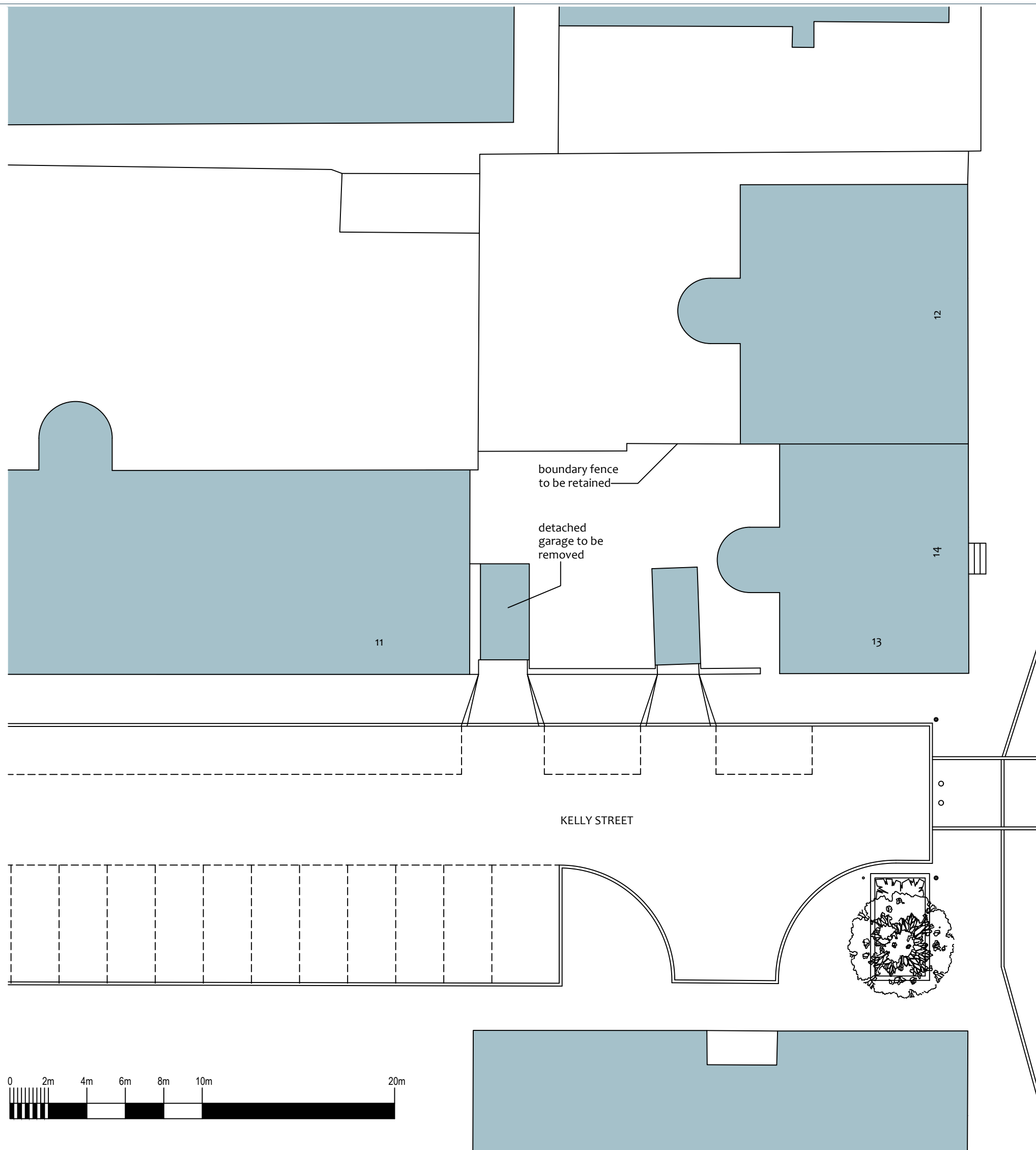
SUITE 1-01, CUSTOM HOUSE,  
CUSTOM HOUSE PLACE,  
GREENOCK, PA15 1EQ  
e info@nicholsonmcshane.co.uk  
t 01475 325025  
w nicholsonmcshane.co.uk

CLIENT			
Mr & Mrs McMenemie			
PROJECT TITLE			
Proposed block of no. flats			
PROJECT ADDRESS			
Ground at 13 Kelly Street, Greenock			
DRAWING TITLE			
Location Plan			
DRAWING STATUS			PAPER SIZE
PLANNING			A3
DRAWING NUMBER			REVISION
20053_LP			A
SCALE	DATE	DRAWN BY	CHECKED BY
1:500	08-07-2021	DN	-



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CHARTERED ARCHITECTS LTD. COPYRIGHT RESERVED





VIEW FROM NORTH



VIEW FROM WEST



REVISION	DESCRIPTION	DATE
A	Site plan altered	03-09-21
-		



SUITE 1-01, CUSTOM HOUSE,  
CUSTOM HOUSE PLACE,  
GREENOCK, PA15 1EQ  
e info@nicholsonmcshane.co.uk  
t 01475 325025  
w nicholsonmcshane.co.uk

CLIENT	Mr & Mrs McMenemie
PROJECT TITLE	Proposed block of 4no. flats
PROJECT ADDRESS	Ground at 13 Kelly Street, Greenock
DRAWING TITLE	Existing and proposed site and layout plans
DRAWING STATUS	PLANNING
DRAWING NUMBER	20053_D.001
SCALE	as stated
DATE	08-07-2021
DRAWN BY	DN
CHECKED BY	-

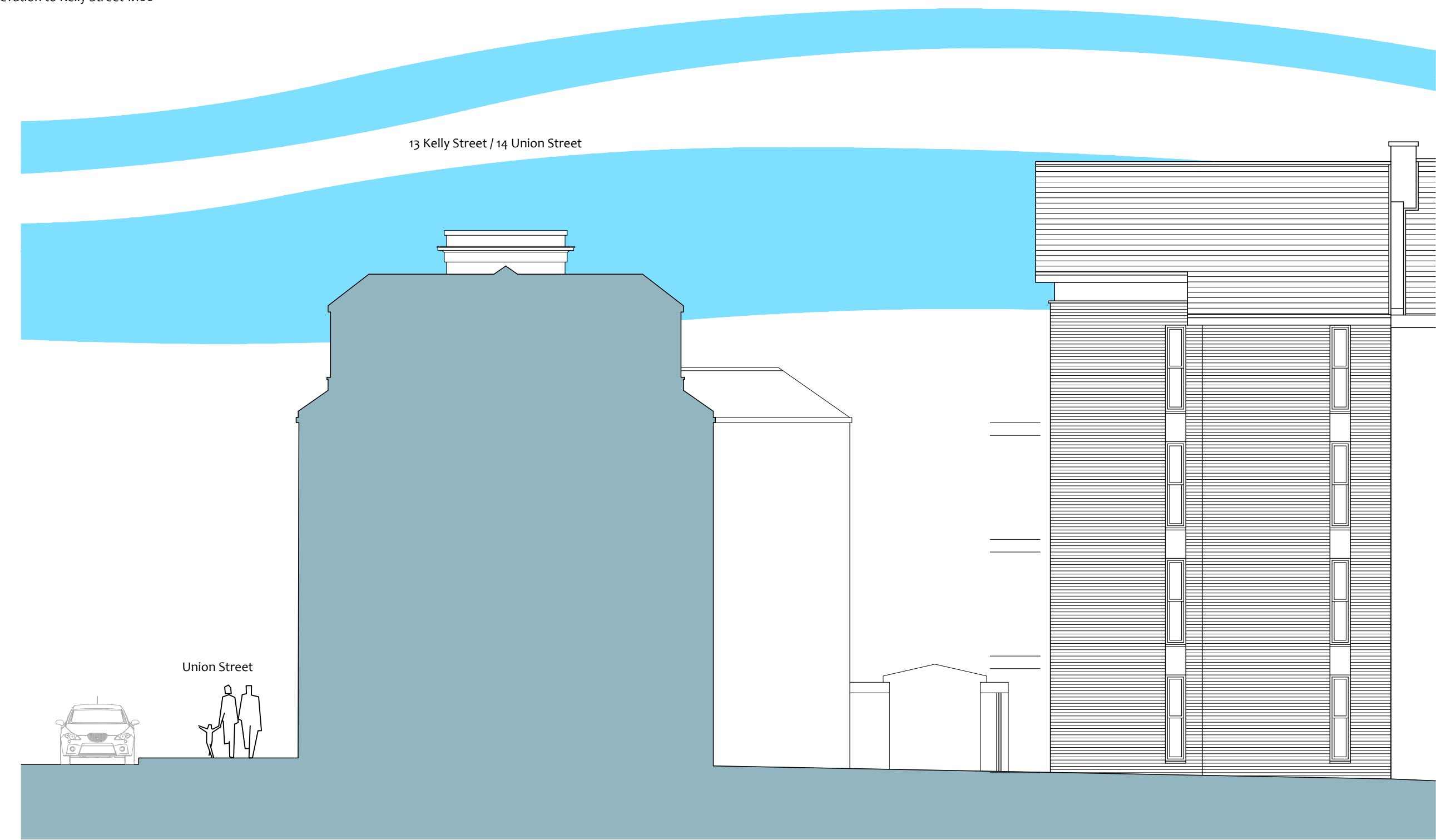


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evation to Kelly Street 1:100



Elevation to East 1:100



Elevation to South 1:100

REVISION	DESCRIPTION	DATE
-	-	07-12-20
-	-	
-	-	
-	-	
-	-	
-	-	



SUITE 1-01, CUSTOM HOUSE,  
CUSTOM HOUSE PLACE,  
GREENOCK, PA15 1EQ  
e info@nicholsonmcshane.co.uk  
t 01475 325025  
w nicholsonmcshane.co.uk

CLIENT  
Mr & Mrs McMenemie

PROJECT TITLE  
Proposed block of no. flats

PROJECT ADDRESS  
Ground at 13 Kelly Street, Greenock

DRAWING TITLE

DRAWING STATUS  
PLANNING

PAPER SIZE  
A1

DRAWING NUMBER  
20053\_C.002

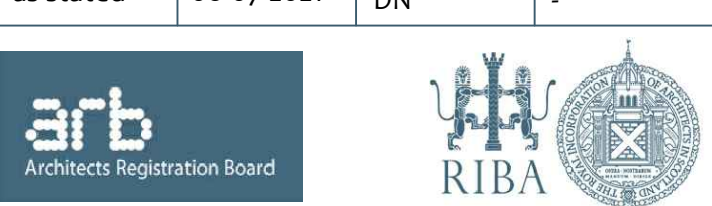
REVISION

SCALE  
as stated

DATE  
08-07-2021

DRAWN BY  
DN

CHECKED BY  
-



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## **2. PLANNING APPLICATION DESIGN STATEMENT**



## Proposed Flats at Kelly Street, Greenock

### Design Statement

#### Introduction and Description

The applicants are the owners of the traditional property forming 13 Kelly Street / 14 Union Street, Greenock. The property forms the east corner of the junction of Union Street and Kelly Street and consists of a four-storey sandstone, slate roofed building with a turnpike stair to the rear. The building has two principal levels with a commercial use on the ground floor. Below is located a basement level and above an attic flat.

Our clients' ground includes a drying green to the north east; this ground also includes two separate lock-up garages with access via dropped kerbs from Kelly Street.



To the north east of our clients' ground is a row of traditional 3-storey sandstone tenements. Our clients own the first floor flat on the gable of the adjoining tenement; this flat has a bathroom window looking into our clients' ground.



The ground is private and currently has no public access or amenity value.

### **Planning Designations and History**

The site is located within Greenock Town Centre but outwith the Central Area and is thus covered by Policy 22 of the adopted Local Development Plan. In addition, the ground lies within Greenock West End Conservation Area (Policy 28). 14 Union Street is C Listed (LB34155) due to the “group interest of the subject”.

Inverclyde Council's interim *Planning Policy Statement on Our Homes and Communities* (October 2020) confirms the following:

Policy A

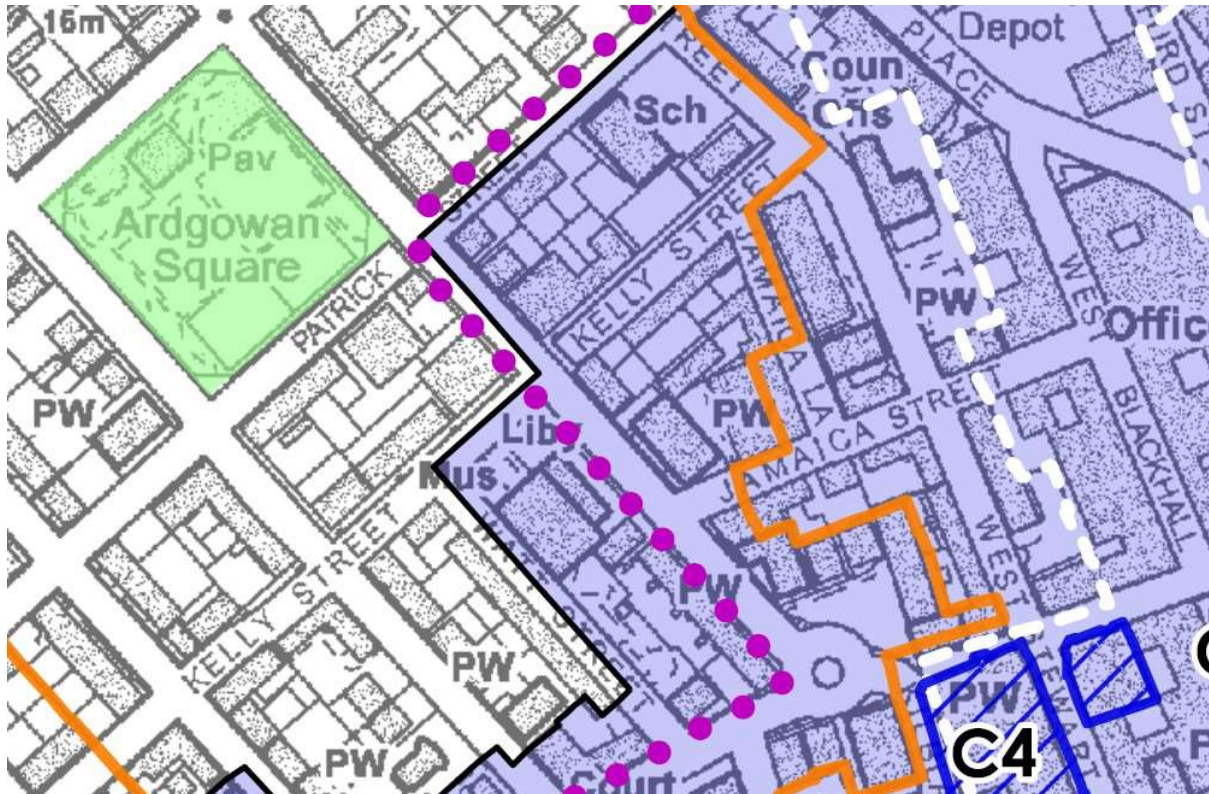
- That there is a “strong preference for appropriate brownfield sites within the identified settlement boundaries”.



- That, to reflect Inverclyde's changing age demographic, “other specialist provision housing, such as wheelchair accessible homes, are also encouraged”.

#### Policy B

- That “New housing development will be supported....on other appropriate sites within residential areas and town and local centres”.



The “HES” document “Managing Change in the Historic Environment: Setting” guides the design of development in relation to the historic environment and this document has been used to inform the process of site analysis and design. The Council's adopted roads guidance (The National Roads Development Guide) has been consulted regarding off-street parking provision.

#### Proposal

Our clients wish to intensify the use of their underused ground in a manner sympathetic to the historic nature of the surrounding area and to the wider environment. The proposed use will consist of a modestly scaled block of 4 flats of a similar scale and massing to the adjacent tenements.

The block will incorporate facing brick external walls, slate pitched roof and traditionally proportioned windows.



#### Response to Planning Policies, HES Guidance and Roads Guidance:

1. The C-listing of 13 Kelly Street / 14 Union Street is in relation to the group of properties forming the north edge of Union Street (11 in total between Robertson Street and George Square). The listing states “This listing relates specifically to the group interest of the subject.”
2. The focus of the listing is views from the south and oblique views of property gables when traversing this street. The building fabric north of this “street elevation” is more disparate in character and has little effect on the character of the listed building group.
3. As the main focus of the listed building is on its front and gable facades and its contribution to the character of Union Street, the proposal will have a minimal effect. In practical terms its sole effect will be to slightly restrict views of the rear elevation of the listed building from the north.



4. Examination of historic Ordnance Survey records shows that the pattern of having turnpike stairs in close proximity to adjoining property was widespread in Greenock prior to the clearance of properties from the town centre area.
5. The proposed development can easily be absorbed into the urban fabric of this part of the Conservation Area without eroding its key characteristics.
6. The building will follow a traditional development pattern to enhance the sense of place of this part of Greenock's West End, in line with Conservation Area policies. The block will sit immediately adjacent to the footway, reflecting adjacent property.
7. The siting of the proposal is such that residential amenity will be minimally affected. The main visual effect will be to the listed property owned by our client (13 Kelly Street / 14 Union Street). The bathroom window of the adjoining first floor flat forming part of 11 Kelly Street can be removed as the applicants own this flat.
8. It is intended that the block will offer enhanced levels of environmental sustainability and energy use, in line with the “silver” standard outlined in Section 7.0 of the Building Standards Technical Handbook. As part of this commitment, low waste technologies will be employed during construction and throughout the life of the building.
9. The proposal will potentially provide a valuable contribution to the Council's desire to promote town-centre based accommodation for older people and those with mobility issues, alleviating the pressure to release ground outwith the settlement boundary.
10. Clause 3.5.4 of Inverclyde Council's adopted Roads guidance (The National Roads Development Guide) states *“For main urban areas a reduction to the parking standard may be considered. Main urban areas are defined as those having frequent and extensive public transport and cycling and walking links, accessing education, healthcare, food shopping and employment”*. The proposed development will occupy a site located within the defined Greenock Town Centre which is adjacent to a major bus route. Thus the proposal does not accommodate off-street parking. On-street car parking can, however, be increased by omitting the current footway crossover into the disused garage.



## Summary

This modestly scaled proposal will provide a positive contribution to the town centre fabric of Greenock whilst respecting the aims and aspirations of the Conservation Area and the siting of the adjacent C listed building.

Nicholson McShane Architects

July 2021

### **3. APPOINTED OFFICER'S REPORT OF HANDLING DATED 8 DECEMBER 2021**



## **REPORT OF HANDLING**

**Report By:** James McColl

**Report No:** 21/0243/IC

**Contact Officer:** 01475 712462

**Date:** 8<sup>th</sup> December 2021

**Subject:** Proposed new build 4-storey block of 4 flats at  
13 Kelly Street, Greenock

## **SITE DESCRIPTION**

The application site relates to part of the rear curtilage of a two and a half storey (excluding basement level) building situated on the corner of Kelly Street and Union Street, Greenock. The principal elevation of the building faces Union Street with the main door property to the front being addressed as 14 Union Street. The secondary access to the rear is from Kelly Street and addressed as 13 Kelly Street. Overall, the site is flat and extends to around 110 square metres. A stone wall bounds Kelly Street and a single garage lies within the site, with another adjacent in the remaining part of the rear curtilage of the building.

The wider area is mixed in nature with a variety of buildings and uses situated on Union Street and Kelly Street and Jamaica Street. These include residential properties, the Watt Institution, office premises, churches and a masonic hall. The site is situated within the outer area of the Greenock Town Centre as defined by the Inverclyde Local Development Plan and it also lies within the Greenock West End Conservation Area. The existing building to which the curtilage containing the application site relates is a Category C listed building.

## **PROPOSAL**

Following the subdivision of the rear curtilage of the existing building fronting Union Street, it is proposed to erect a four storey block of flats with an external footprint of around 73 square metres. The proposed block will accommodate four, one bedroom flats, with a flat on each floor. The building will be designed with a pitched roof to a height of around 14.5 metres, and this will match the height of the adjoining tenement. External materials will comprise buff facing brick, feature cladding panels and a slate roof. To the front elevation, the windows will be traditionally proportioned and it is indicated they will be designed with a stepped profile. The existing garage and boundary wall to Kelly Street will be removed. A small outside area will accommodate bin storage.

The applicant has submitted a design statement in support of the proposal.

## **DEVELOPMENT PLAN POLICIES**

### **ADOPTED 2019 INVERCLYDE LOCAL DEVELOPMENT PLAN**



## **Policy 1 - Creating Successful Places**

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing development proposals, consideration must be given to the factors set out in Figure 3. Where relevant, applications will also be assessed against the Planning Application Advice Notes Supplementary Guidance.

## **Policy 6 - Low and Zero Carbon Generating Technology**

Support will be given to all new buildings designed to ensure that at least 15% of the carbon dioxide emissions reduction standard set by Scottish Building Standards is met through the installation and operation of low and zero carbon generating technologies. This percentage will increase to at least 20% by the end of 2022.

Other solutions will be considered where:

- a) it can be demonstrated that there are significant technical constraints to using on-site low and zero-carbon generating technologies; and
- b) there is likely to be an adverse impact on the historic environment

\*This requirement will not apply to those exceptions set out in Standard 6.1 of the 2017 Domestic and Non-Domestic Technical Handbooks associated with the Building (Scotland) Regulations 2004, or to equivalent exceptions set out in later versions of the handbook.

## **Policy 8 - Managing Flood Risk**

Development proposals will be assessed against the Flood Risk Framework set out in Scottish Planning Policy. Proposals must demonstrate that they will not:

- a) be at significant risk of flooding; (i.e. within the 1 in 200 year design envelope);
- b) increase the level of flood risk elsewhere; and
- c) reduce the water conveyance and storage capacity of a functional flood plain.

The Council will support, in principle, the flood protection schemes set out in the Clyde and Loch Lomond Local Flood Risk Management Plan 2016, subject to assessment of the impacts on the amenity and operations of existing and adjacent uses, the green network, historic buildings and places, and the transport network.

## **Policy 9 - Surface and Waste Water Drainage**

New build development proposals which require surface water to be drained should demonstrate that this will be achieved during construction and once completed through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters.

The provision of SuDS should be compliant with the principles set out in the SuDS Manual C753 and Sewers for Scotland 3rd edition, or any successor documents.

Where waste water drainage is required, it must be demonstrated that the development can connect to the existing public sewerage system. Where a public connection is not feasible at present, a temporary waste water drainage system can be supported if:

- i. a public connection will be available in future, either through committed sewerage infrastructure or pro-rata developer contributions; and
- ii. the design of, and maintenance arrangements for, the temporary system meet the requirements of SEPA, Scottish Water and Inverclyde Council, as appropriate.

Private sustainable sewerage systems within the countryside can be supported if it is demonstrated that they pose no amenity, health or environmental risks, either individually or cumulatively.

Developments including SuDS are required to have an acceptable maintenance plan in place.

### **Policy 10 - Promoting Sustainable and Active Travel**

Development proposals, proportionate to their scale and proposed use, are required to:

- a) provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, include links to the wider walking and cycling network; and
- b) include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; the green network; and historic buildings and places.

### **Policy 11 - Managing Impact of Development on the Transport Network**

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. Development should comply with the Council's roads development guidelines and parking standards. Developers are required to provide or contribute to improvements to the transport network that are necessary as a result of the proposed development.

### **Policy 16 - Contaminated Land**

Development proposed on land that the Council considers to be potentially contaminated will only be supported where a survey has identified the nature and extent of any contamination present on site and set out a programme of remediation or mitigation measures that ensure that the site can be made suitable for the proposed use.

### **Policy 22 - Network of Centres Strategy**

The preferred locations for the uses set out in Schedule 6 are within the network of town and local centres identified in Schedule 7. Proposals which accord with the role and function of the network of centres as set out in Schedule 7 and the opportunities identified in Schedule 8 will be supported. Proposals for Schedule 6 uses outwith the network of centres or not conforming with the role and function of a particular centre will only be supported if it can be demonstrated that:

- a) there is not a suitable sequentially preferable opportunity;
- b) there will not be an unacceptable impact on the vibrancy, vitality or viability of other centres within the network of centres; and
- c) there are clear community or economic benefits that can be best achieved at the proposed location.

Proposals for Business (Class 4), residential and hotel uses will also be supported in town and local centres.

## **Policy 28 - Conservation Areas**

Proposals for development within or affecting the setting of a conservation area, are to preserve or enhance the character and appearance of the area. In assessing such proposals regard will be had to any relevant Conservation Area Appraisals or other information relating to the historic or architectural value of the conservation area. Where the demolition of an unlisted building is proposed, consideration will be given to the contribution the building makes to the character and appearance of the conservation area. If such a building makes a positive contribution to the area, there will be a presumption in favour of retaining it. Proposals for demolition will not be supported in the absence of a planning application for a replacement development that preserves or enhances the character and appearance of the conservation area.

## **Policy 29 - Listed Buildings**

Proposals for development affecting a listed building, including its setting, are required to protect its special architectural or historical interest. In assessing proposals, due consideration will be given to how the proposals will enable the building to remain in active use.

Demolition of a listed building will not be permitted unless the building is no longer of special interest; it is clearly incapable of repair; or there are overriding environmental or economic reasons in support of its demolition. Applicants should also demonstrate that every reasonable effort has been made to secure the future of the building.

**Planning Application Advice Note (PAAN) 3** on "Private and Public Open Space Provision in New Residential Development" applies.

## **PROPOSED DEVELOPMENT PLAN POLICIES**

### **Policy 1 - Creating Successful Places**

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing and assessing development proposals, consideration must be given to the factors set out in Figure 2 and demonstrated in a design-led approach. Where relevant, applications will also be assessed against the Planning Application Advice Notes and Design Guidance for New Residential Development Supplementary Guidance. When assessing proposals for the development opportunities identified by this Plan, regard will also be had to the mitigation and enhancement measures set out in the Strategic Environmental Assessment Environmental Report.

### **Policy 6 - Low and Zero Carbon Generating Technology**

Support will be given to all new buildings designed to ensure that at least 20% of the carbon dioxide emissions reduction standard set by Scottish Building Standards is met through the installation and operation of low and zero carbon generating technologies. This percentage will increase to at least 25% by the end of 2025.

Other solutions will be considered where:

- a) it can be demonstrated that there are significant technical constraints to using on-site low and zero-carbon generating technologies; and
- b) there is likely to be an adverse impact on the historic or natural environment.

\*This requirement will not apply to those exceptions set out in Standard 6.1 of the 2017 Domestic and Non-Domestic Technical Handbooks associated with the Building (Scotland) Regulations 2004, or to equivalent exceptions set out in later versions of the handbook.

## **Policy 9 - Managing Flood Risk**

Development proposals will be assessed against the Flood Risk Framework set out in Scottish Planning Policy. Proposals must demonstrate that they will not:

- a) be at significant risk of flooding (i.e. within the 1 in 200 year design envelope);
- b) increase the level of flood risk elsewhere; and
- c) reduce the water conveyance and storage capacity of a functional flood plain.

The Council will support, in principle, the flood risk management schemes set out in the Clyde and Loch Lomond Local Flood Risk Management Plan 2016, subject to assessment of the impacts on the amenity and operations of existing and adjacent uses, the resources protected by the Plans historic buildings and places and natural and open spaces chapters, and the transport network. Where practical and effective, nature-based solutions to flood management will be preferred.

## **Policy 10 - Surface and Waste Water Drainage**

New build development proposals which require surface water to be drained should demonstrate that this will be achieved during construction and once completed through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters.

The provision of SuDS should be compliant with the principles set out in the SuDS Manual C753 and Sewers for Scotland 4th edition, or any successor documents.

Where waste water drainage is required, it must be demonstrated that the development can connect to the existing public sewerage system. Where a public connection is not feasible at present, a temporary waste water drainage system can be supported if:

- i. a public connection will be available in future, either through committed sewerage infrastructure or pro-rata developer contributions; and
- ii. the design of, and maintenance arrangements for, the temporary system meet the requirements of SEPA, Scottish Water and Inverclyde Council, as appropriate.

Private sustainable sewerage systems within the countryside can be supported if it is demonstrated that they pose no amenity, health or environmental risks, either individually or cumulatively.

Developments including SuDS are required to have an acceptable maintenance plan in place, which identifies who will be responsible for maintenance and how this will be funded in the long term.

## **Policy 11 - Promoting Sustainable and Active Travel**

Development proposals, proportionate to their scale and proposed use, are required to:

- a) provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, including links to the wider walking, cycling network and public transport network; and
- b) include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.



The Council will support the implementation of transport and active travel schemes as set out in national, regional and Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; and the resources protected by the Plan's historic buildings and places and natural and open spaces chapters

### **Policy 12 - Managing Impact of Development on the Transport Network**

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network.

Development should comply with the Council's roads development guidelines and parking standards, including cycle parking standards.

Developers are required to provide or financially contribute to improvements to the transport network that are necessary as a result of the proposed development.

### **Policy 17 - Brownfield Development**

The Council offers in principle support for proposals to bring brownfield sites in the urban area into beneficial use.

Proposals for the temporary greening of brownfield sites will be supported where it is demonstrated that they will deliver a positive impact to the local environment and overall amenity of the area. For sites identified for development in this Plan, temporary greening projects should not prejudice the future development of the site.

Proposals for advanced structure planting to create a landscape framework for future development on sites identified in the Plan will be supported.

Development proposed on land that the Council considers to be potentially contaminated will only be supported where a survey has identified the nature and extent of any contamination present on site and set out a programme of remediation or mitigation measures that are acceptable to the Council and ensure that the site can be made suitable for the proposed use.

### **Policy 18 - Land for Housing**

To enable delivery of the Clydeplan Strategic Development Plan housing supply target for Inverclyde, new housing development will be supported on the sites identified in Schedule 3, and on other appropriate sites within residential areas and town and local centres. All proposals for residential development will be assessed against relevant Supplementary Guidance including Design Guidance for Residential Development, Planning Application Advice Notes, and Delivering Green Infrastructure in New Development.

The Council will undertake an annual audit of housing land in order to ensure that it maintains a 5 year effective housing land supply. If additional land is required for housing development, the Council will consider proposals with regard to the policies applicable to the site and the following criteria:

- a) a strong preference for appropriate brownfield sites within the identified settlement boundaries;
- b) there being no adverse impact on the delivery of the Priority Places and Projects identified by the Plan;
- c) that the proposal is for sustainable development; and
- d) evidence that the proposed site(s) will deliver housing in time to address the identified shortfall within the relevant Housing Market Area.

There will be a requirement for 25% of houses on greenfield housing sites in the Inverclyde villages to be for affordable housing. Supplementary Guidance will be prepared in respect of this requirement.

### **Policy 23 - Network of Centres Strategy**

The preferred locations for the uses set out in Schedule 5 are within the network of town and local centres identified in Schedule 6. Proposals which accord with the role and function of the network of centres as set out in Schedule 6 and the opportunities identified in Schedule 7 will be supported. Proposals for Schedule 6 uses outwith the network of centres or not conforming with the role and function of a particular centre will only be supported if it can be demonstrated that:

- a) there is not a suitable sequentially preferable opportunity;
- b) there will not be an unacceptable impact on the vibrancy, vitality or viability of other centres within the network of centres; and
- c) there are clear community or economic benefits that can be best achieved at the proposed location.

Proposals for Business (Class 4), residential and hotel uses will also be supported in town and local centres.

### **Policy 28 - Conservation Areas**

Proposals for development, within or affecting the setting of a conservation area, are to preserve or enhance the character and appearance of the area. In assessing such proposals regard will be had to any relevant Conservation Area Appraisals or other information relating to the historic or architectural value of the conservation area.

Where the demolition of an unlisted building is proposed, consideration will be given to the contribution the building makes to the character and appearance of the conservation area. If such a building makes a positive contribution to the area, there will be a presumption in favour of retaining it. Applicants should demonstrate that every reasonable effort has been made to secure the future of the building. Proposals for demolition will not be supported in the absence of a planning application for a replacement development that preserves or enhances the character and appearance of the conservation area.

### **Policy 29 - Listed Buildings**

Proposals for development affecting a listed building, including its setting, are required to protect its special architectural or historical interest. In assessing proposals, due consideration will be given to how the proposals will enable the building to remain in active use.

Demolition of a listed building will not be permitted unless the building is no longer of special interest; it is clearly incapable of meaningful repair; or there are overriding environmental or economic reasons in support of its demolition. Applicants should also demonstrate that every reasonable effort has been made to secure the future of the building as set out in national guidance.

**Draft Planning Application Advice Note (PAAN) 3** on "Private and Public Open Space Provision in New Residential Development" applies.

## **CONSULTATIONS**

**Head of Service - Roads and Transportation** – The following points are highlighted inclusive of the requirement of off street parking provision:

- Parking should be provided in accordance with the National Roads Development Guidelines:

1 bedroom	1 parking space
2-3 bedrooms	2 parking spaces
4 bedrooms	3 parking spaces

Visitor parking should be provided at 0.25 spaces per dwelling (unallocated).

- The application proposes 4 no 1 bedroom flats which requires 1 parking space each and 1 visitor spaces, however a previous decision by a Scottish Government Reporter suggested 1 space per 2 dwellings. The applicant should therefore provide a minimum of 2 off-road parking spaces.
- Parking spaces should be a minimum of 2.5m x 5.0m.
- Access to off-road parking should be via a footway crossover and will require a Section 56 Agreement.
- Drainage details should be submitted for approval.
- All surface water run-off shall be contained within the site
- Confirmation of connection to Scottish Water Network should be submitted for approval.

**Head of Public Protection and Covid Recovery** – No objections. Conditions in respect of ground contamination and Japanese Knotweed, bin provision, external lighting and sound insulation complying with the building regulations are recommended.

## **PUBLICITY**

The application was advertised in the Greenock Telegraph on 17th September 2021 as a development affecting a conservation area and the setting of a listed building.

## **SITE NOTICES**

A site notice was posted on 21st September 2021 for a development affecting a conservation area and the setting of a listed building.

## **PUBLIC PARTICIPATION**

Three objections have been received from two individuals. The concerns raised can be summarised as follows:

- The appearance of the proposed building is not in keeping with the Conservation Area location.
- Additional on-street parking and congestion will occur.
- The rear gardens of the adjacent flatted block will be shaded by the development.
- Overlooking will occur to the rear gardens of the neighbouring flatted block.
- Work vans and scaffolding will cause congestion in the street.

I will consider these concerns in my assessment.

## **ASSESSMENT**

The material considerations in the assessment of this application are national planning policy inclusive of Scottish Planning Policy (SPP), the adopted 2019 Inverclyde Local Development Plan, the 2021 proposed Inverclyde Local Development Plan, adopted and draft Planning Application Advice Note (PAAN) and 3 on "Private and Public Open Space Provision in New Residential Development", Historic Environment Scotland's Historic Environment Policy for Scotland and "Managing Change in the Historic Environment" guidance note series, the impact within the

Conservation Area, impact on the setting of the listed building, the impact on residential amenity, road safety implications, the consultation responses and the objections received.

SPP introduces a presumption in favour of sustainable development and indicates that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place but not to allow development at any cost. Planning policies and decisions should support sustainable development. The site is located within the Greenock Town Centre Outer Area as defined by the adopted Local Development Plan and Policy 22 supports proposals for residential development in town and local centres. This position is reflected by Policy 23 of the proposed Plan. Policy 1 of both Plans requires all development to have regard to the six qualities of successful places. The relevant factors in respect of this development contributing to the qualities of successful places are being "Distinctive" in reflecting local architecture and urban form (expanded to "respect landscape setting and character, and urban form" and "reflect local vernacular/architecture and materials" in the proposed Local Development Plan) and contributing positively to historic places; and being "Safe and Pleasant" in avoiding conflict with adjacent uses in respect of overshadowing, privacy and noise. Policy 17 of the proposed Plan supports the principle of bringing brownfield sites in the urban area into use and Policy 18 of the proposed Plan supports new housing development on sites identified in Schedule 3 and on other appropriate sites within residential areas. The site is not identified in Schedule 3. Whilst the applicant cites the Council's interim Planning Policy Statement on Our Homes and Communities as a relevant consideration, this was superseded by the publication of the proposed Local Development Plan.

Policy 28 of the adopted and proposed Local Development Plan advises that proposals for development within a conservation area require to preserve or enhance the character and appearance of the area. It is further advised that in assessing such proposals any relevant Conservation Area Appraisals or other information relating to the historic or architectural value of the conservation area requires to be considered. The Greenock West End Conservation Area Appraisal identifies the application site as being within the south-east character area of the Conservation Area which dates from the late Georgian to early Victorian period. The townscape within this area reflects its earlier development. The area is mixed in uses and based on a regular grid pattern with relatively higher density and buildings close to the street line. The Appraisal goes on to advise that in assessing planning applications, the Council shall consider them in relation to the relevant Local Development Plan. The Appraisal is not generally supportive of new development within existing plots and notes that new development should follow existing plot ratios. Policy 29 of both Plans requires proposals for development affecting a listed building, including its setting, to protect its special architectural or historical interest. Historic Environment Scotland's "Managing Change in the Historic Environment" guidance note on "Setting" advises that setting can be important to the way in which historic places are understood, appreciated and experienced, and provides guidance on factors to be considered in assessing the impact of a change on the setting of a historic asset or place.

Adopted and draft PAAN3 on "Private and Public Open Space Provision in New Residential Development" advises that for flatted infill developments should reflect the existing scale of buildings and townscape in the immediate environs. Open space need only be provided where surplus land is available following the provision of any off-street parking.

Whilst the applicant notes that the site has no public access or amenity value, it currently functions as a domestic garden for the flatted dwelling at attic level within the existing building and does not appear as an untidy or derelict site within the streetscape. The existing building fronting Union Street appears to date from the first half of the 1800s. It was designed to directly front Union Street with a north facing rear garden. This is similar to other properties on Union Street developed during this period including the neighbouring property and others to the west on Union Street. The adjoining tenement style flats situated on Kelly Street are of a later development and they stopped at the rear boundary of the Union Street property. This pattern of development together with the original plots of buildings fronting Union Street can still be seen today at the northern side of the Kelly Street / Union Street junction and also at the Patrick Street / Union Street junction beyond. To the opposite side of Kelly Street, it is acknowledged that the Masonic Club building has infilled the equivalent rear

curtilage of the building at 16 Union Street. This infill development is, however, low rise and does not create a sense of visual domination of the space between the buildings.

It is accepted that the proposed building reflects the scale, height and massing of the immediately adjoining tenement and that it is not expected that the development would be one which simply seeks to be a pastiche of other buildings within the Conservation Area. Whilst the applicant has sought to ensure a traditionally proportioned window arrangement to the front elevation with window units with a stepped profile, this is not something that is carried through to the side elevation which will also be visible within the streetscape. I do not consider that the use of a buff facing brick as the primary external material is appropriate with reference to the finishing materials of the surrounding buildings within this part of the Conservation Area, nor do I consider that the use of the feature cladding panels to be an appropriate design feature. However, regardless of the detail of the design and use of external materials and of greater importance is that the flatted block proposed would be developed within the existing rear curtilage which forms part of the original pattern of development within the locality together with the original plot of the listed building. The applicant highlights that the focus of the listing is the front and the gable facades of the building. Whilst it may be accepted that the rear of the listed building is unremarkable in respect of design details, overall, the rear curtilage forms an important part of its setting within the street. This would be lost by the proposed development. Whilst there are instances where developing within an original plot can be acceptable, particularly with a bespoke design, I am concerned that this proposal would result in a cramped appearance within the streetscape, out of step with the original pattern of development and to the detriment of the setting of the listed building which retains its original plot.

I do not consider that the detail of the design approach and use of materials is appropriate and one which would preserve or enhance the Conservation Area as required by Policy 28 of the adopted and proposed Local Development Plans. As the proposal would be to the detriment of the setting of the listed building it is also not supported by Policy 29 of both Plans. In respect of the factors contributing to successful places, it therefore cannot be held that the proposal reflects local architecture and urban form and contributes positively to historic places. The proposal thus fails under the "Distinctive" heading and is thus not supported by Policy 1 of both the adopted and proposed Local Development Plans. The proposal also fails to follow the advice and guidance within paragraph 8.2 of the Greenock West End Conservation Area Appraisal which highlights a presumption against development within the original plots in the Conservation Area.

Turning to residential amenity, any development project will produce noise and an element of disruption during the construction phase and this cannot be a determining factor in consider whether to grant planning permission: this is a matter controlled by legislation operated by the Head of Public Protection and Covid Recovery. It is recognised that the neighbouring residents have an established level of amenity. No additional privacy issues arise in respect of the flatted properties to the opposite side of Kelly Street. I note concern raised regarding privacy implications for adjacent rear gardens. Whilst views may be possible across to the rear gardens of the flatted properties adjacent on Kelly Street, these gardens are already overlooked by numerous windows and I do not consider that any additional privacy concerns arise beyond the established position. Whilst the rear curtilage of 12 Union Street will be overlooked in close proximity by the new development, this area is again not private and is already overlooked by a number of windows from flatted properties. I am, however concerned over the relationship between the gable windows on the proposed flatted block and the windows to the upper flat in the existing donor building fronting Union Street. Whilst there is some offset between the existing and proposed windows there are a variety of windows to each floor facing the rear of the existing building with a window to window distance between just over 8 metres to around 11.5 metres and this leads to an unacceptable level of concern occurring in respect of the potential detriment to the privacy of the residents in both the existing and proposed buildings. Given the windows serve bedrooms, kitchens and living rooms, the use of opaque glazing is not considered appropriate. The proposal thus additionally fails under the "Safe and Pleasant" criteria and is again thus not supported by Policy 1 of both the adopted and proposed Local Development Plans. The proposal will require the loss of a bathroom window to the gable of the adjacent tenement. It is indicated that the affected flat is under the ownership of the applicant and the loss of a bathroom window raised no amenity implications.

The new flatted dwellings are within an accessible urban location to the edge of the town centre. They are within a short walk of a variety of town centre services and facilities together with Greenock Bus station which is around a 5 minute walk away. Greenock West railway station which provides for services to Gourock, Port Glasgow, Paisley and Glasgow, where a range of onward connections are available, is around a 10 minute walk from the site. There are no implications in respect of Policy 10 of the adopted Plan and Policy 11 of the proposed Plan. I note the concerns raised in respect of parking and congestion at this location. With regard to parking and roads matters, I am principally guided by the advice of the Head of Service – Roads and Transportation. I note the existing garage to be removed is not of sufficient dimensions to constitute a parking space. The Head of Service – Roads and Transportation advises that in respect of meeting the requirements of the Roads Development Guide, the proposal for four, one bedroom flats requires one parking space per flat plus one visitor space. However, a reduced level of parking comprising two off-street parking spaces would be acceptable to the Head of Service – Roads and Transportation. No off-street parking is proposed nor is it possible to provide any within the application site. The proposal does not therefore comply with the Council's parking standards as required by Policy 11 of the adopted Local Development Plan and Policy 12 of the proposed Local Development Plan.

Turning to flooding and drainage, the The Head of Service – Roads and Transportation offers no objections in this respect. It is advised that drainage details will require to be submitted for approval. It is further advised that all surface water run-off would require to be contained within the site and confirmation of the connection to the Scottish Water Network be submitted for approval. I am satisfied that these matters could be addressed by condition if required and this would ensure the proposal was acceptable with reference to Policies 8 and 9 of the adopted Local Development Plan and Policies 9 and 10 of the proposed Local Development Plan. Considering the outstanding points raised in the consultation responses, the Head of Public Protection and Covid Recovery raises no objections in respect of the proposal. I am satisfied that matters in respect of ground contamination and Japanese Knotweed could be addressed by condition. In this respect, I consider that the proposals would comply with the requirements of Policy 16 of the adopted Local Development Plan and this aspect of Policy 17 of the proposed Local Development Plan. Matters relating to external lighting could be addressed by advisory note and compliance with the Building (Scotland) Regulations is addressed via the building warrant process.

As an element of design, Policy 6 of the adopted Local Development Plan also seeks to ensure that all new buildings are energy efficient through the installation of low and zero carbon generating technologies and that at least 15% of the carbon dioxide emissions reduction standard set by Scottish Building Standards is met through the installation and operation of low and zero carbon generating technologies. Policy 6 of the proposed Plan reflects the updated position with a 20% requirement. This requirement can also be addressed by condition if required.

Overall, I note the position of the applicant that the proposal could provide a valuable contribution in promoting town-centre based accommodation for older people and those with mobility issues, alleviating the pressure to release ground outwith the settlement boundary. Whilst it is true that the proposal will be situated within an accessible urban location a number of concerns arise. It is not considered that the detail of the design approach and use of materials is appropriate and one which would preserve or enhance the Conservation Area as required by Policy 28 of the adopted and proposed Local Development Plans and as the proposal would be to the detriment of the setting of the listed building it is also not supported by Policy 29 of both Plans. The window to window relationship between the existing building and the proposed development also raises an unacceptable level of concern in respect of the potential detriment to the privacy of the residents within both the existing and proposed buildings. The failure to provide the required off-street parking as set out by the Head of Service – Roads and Transportation in her consultation response also renders the proposal unacceptable with reference to Policy 11 of the adopted Plan and Policy 12 of the proposed Plan. Additionally, the proposal fails to reflect the six qualities of successful places and is thus not supported by Policy 1 of both the adopted and proposed Local Development Plans. Considering the principles of sustainable development in respect of paragraph 29 of SPP, the proposal fails in respect of two of these as it is not considered to support the six qualities of successful



places or to protect and enhance the historic environment. The proposal is thus not sustainable development with reference to SPP and not the right development in the right place. Finally, the proposal also fails to follow the advice and guidance within paragraph 8.2 of the Greenock West End Conservation Area Appraisal which highlights a presumption against development within the original plots in the Conservation Area.

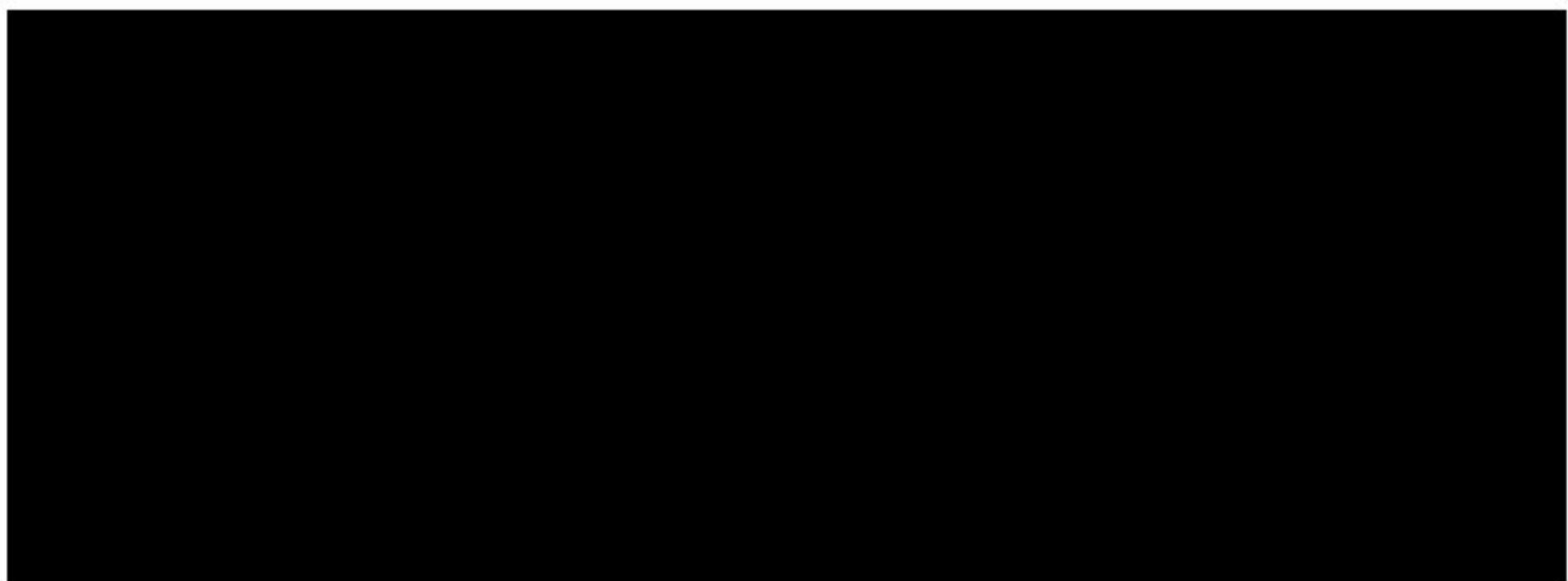
In conclusion, Section 25 of The Town and Country Planning (Scotland) Act 1997 (as amended) requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The proposal cannot be held to accord with the Development Plan and in reviewing the application, together with the applicant's position set out in the supporting statement, it is concluded that there are no material considerations to indicate that the application should be considered favourably.

## **RECOMMENDATION**

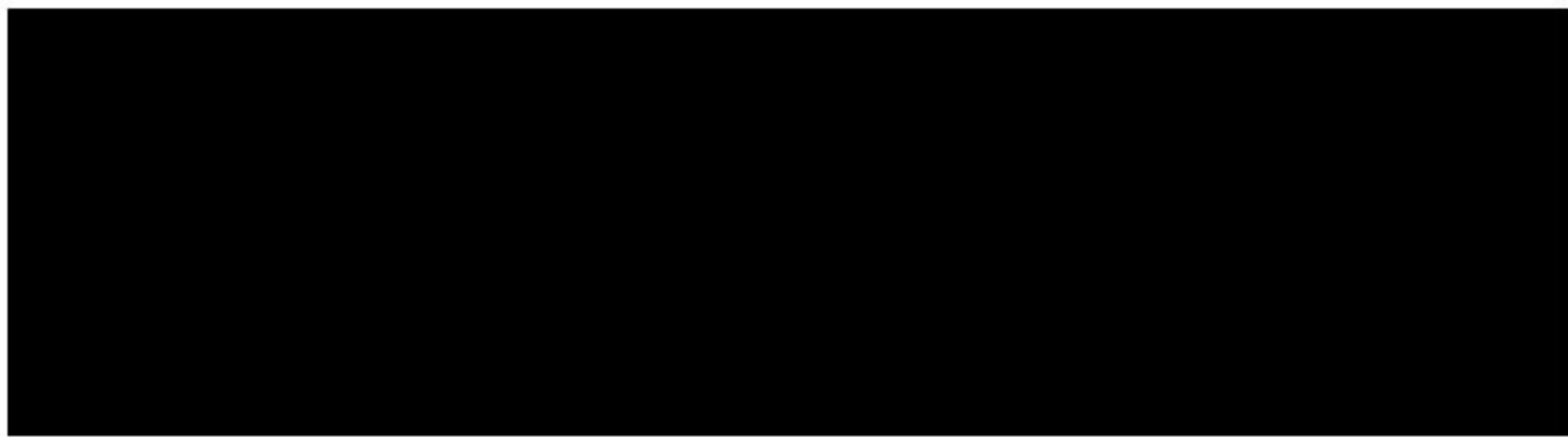
That the application be refused for the following reasons:

1. The proposal fails to accord with the principles set out in paragraph 29 of Scottish Planning Policy and it cannot be concluded that the proposal constitutes sustainable development and is the right development in the right place.
2. The proposal by virtue of the detail of the design approach and use of materials at this location fails to preserve or enhance the Greenock West End Conservation Area contrary to the requirements of Policy 28 of both the 2019 adopted Inverclyde Local Development Plan and the 2021 proposed Inverclyde Local Development Plan.
3. By developing the original rear curtilage of the existing building fronting Union Street the proposal would be to the detriment of the setting of the listed building it is also not supported by Policy 29 of both the 2019 adopted Inverclyde Local Development Plan and the 2021 proposed Inverclyde Local Development Plan.
4. The proposal fails to have regard to the six qualities of successful places as required by Policy 1 of both the 2019 Inverclyde Local Development Plan and 2021 proposed Inverclyde Local Development Plan, specifically as it fails to reflect local architecture and urban form and contribute positively to historic places under the "Distinctive" heading and fails to avoid conflict in respect of window to window privacy under the "Safe and Pleasant" heading.
5. No off-street parking is provided and the proposal does not therefore meet with the requirements of Policy 11 of the 2019 adopted Inverclyde Local Development Plan and Policy 12 of the 2021 proposed Inverclyde Local Development Plan.
6. The proposal fails to follow the advice and guidance within paragraph 8.2 of the Greenock West End Conservation Area Appraisal which highlights a presumption against development within the original plots in the Conservation Area.

Signed:



James McColl  
Case Officer



Stuart Jamieson  
Interim Service Director  
Environment & Economic Recovery



## **4. INVERCLYDE LOCAL DEVELOPMENT PLAN 2019 POLICY EXTRACTS**

## 3.0 CREATING SUCCESSFUL PLACES

### Introduction

**3.1** Inverclyde has many fantastic and unique places. Examples include the Free French Memorial and Lyle Hill, which offer panoramic views over the Firth of Clyde; Quarriers Village, built in the 19<sup>th</sup> century as an orphans' village and filled with individually designed homes of that period; the A-listed Edwardian Wemyss Bay railway station; and the grid-pattern Greenock West End conservation area, which is contained to the north by the popular Greenock Esplanade. These, and other places, have stood the test of time and remain places where people want to live and visit.

**3.2** The Council is keen to have more successful places in Inverclyde, and all new development will be expected to contribute to creating successful places. This is particularly important in relation to the Plan's Priority Projects and Priority Places, which reflect major Council investments and the larger scale regeneration opportunities in Inverclyde.

### Creating Successful Places

**3.3** The Council is keen that all development contributes to making Inverclyde a better place to live, work, study, visit and invest. To differing degrees, all scales and types of development have the potential to make an impact on the surrounding environment and community. It is important to the Council that this impact is a positive one. To this end, the Council will have regard to the six qualities of a successful place when considering all development proposals.

**Distinctive**

**Adaptable**

**Resource Efficient**

**Easy to Move Around**

**Safe and Pleasant**

**Welcoming**

**3.4** **Figure 3** illustrates the factors that contribute to the six qualities of a successful place. Not all will be relevant to every development proposal and planning application, but where they are, the Council will expect development proposals to have taken account of them, and it will have regard to them in the assessment of planning applications.



Quarriers Village

### POLICY 1 – CREATING SUCCESSFUL PLACES

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing development proposals, consideration must be given to the factors set out in Figure 3. Where relevant, applications will also be assessed against the Planning Application Advice Notes Supplementary Guidance.



Wemyss Bay Railway Station

**FIGURE 3: Factors Contributing to Successful Places**





**4.6** Wind turbines are a means of generating electricity from a renewable resource. The Council's Supplementary Guidance on Energy will set out a spatial framework and other criteria to guide and assess proposals for wind turbines and wind farms, as well as guidance for other renewable energy technologies.

## POLICY 4 – SUPPLYING ENERGY

Proposals for infrastructure for the generation, storage or distribution of heat and electricity will be supported in principle where they contribute to a reduction in greenhouse gas production. Proposals will be assessed with regard to impact on:

- a) the green network (including landscape), and historic buildings and places;
- b) the amenity and operations of existing and adjacent uses;
- c) tourism and recreational resources;
- d) air quality;
- e) aviation and defence interests;
- f) telecommunication and broadcasting interests; and
- g) traffic and pedestrian safety

Relevant proposals are required to accord with the Council's Supplementary Guidance on Energy.



## Heat Networks

**4.7** Heat networks offer the opportunity for a more efficient and sustainable means of generating and delivering heat by removing the generation of heat from within individual properties to a communal facility. Heat networks, which are also referred to as district heating, are part of the step-change required towards a more sustainable future and less reliance on gas, and other carbon fuels, as a heat source.

## POLICY 5 – HEAT NETWORKS

Major Development applications will be required to include an energy statement which considers the feasibility of meeting the development's heat demand through a district heating network or other low-carbon alternatives. All proposed developments located adjacent to significant heat sources or proposed/existing heat networks should be designed in such a way as to be capable of connecting to a heat network from that source and any land required for heat network infrastructure should be protected.

## Low and Zero Carbon Generating Technology

**4.8** The Plan is obliged by the Climate Change (Scotland) Act 2009 to include a policy requiring all new buildings to avoid greenhouse gas emissions through the installation of low and zero carbon generating technologies.

## POLICY 6 – LOW AND ZERO CARBON GENERATING TECHNOLOGY

Support will be given to all new buildings designed to ensure that at least 15% of the carbon dioxide emissions reduction standard set by Scottish Building Standards is met through the installation and operation of low and zero-carbon generating technologies. This percentage will increase to at least 20% by the end of 2022. Other solutions will be considered where:

- (a) it can be demonstrated that there are significant technical constraints to using on-site low and zero-carbon generating technologies; and
- (b) there is likely to be an adverse impact on the historic environment.

\*This requirement will not apply to those exceptions set out in Standard 6.1 of the 2017 Domestic and Non-Domestic Technical Handbooks associated with the Building (Scotland) Regulations 2004, or to equivalent exceptions set out in later versions of the handbook.

## POLICY 8 – MANAGING FLOOD RISK

Development proposals will be assessed against the Flood Risk Framework set out in Scottish Planning Policy. Proposals must demonstrate that they will not:

- a) be at significant risk of flooding (i.e. within the 1 in 200 year design envelope);
- b) increase the level of flood risk elsewhere; and
- c) reduce the water conveyance and storage capacity of a functional flood plain.

The Council will support, in principle, the flood protection schemes set out in the Clyde and Loch Lomond Local Flood Risk Management Plan 2016, subject to assessment of the impacts on the amenity and operations of existing and adjacent uses, the green network, historic buildings and places, and the transport network.



### Surface and Waste Water Drainage

**4.16** Surface water is a significant cause of flooding in Inverclyde, and can also impact on water quality by carrying pollutants into local burns and rivers. To address these issues, many new developments now require to include Sustainable Drainage Systems (SuDS). These systems can also provide an opportunity for

enhancing local biodiversity by creating ponds and wetlands, which slow water flow and filter out pollutants. It is also important that waste water (effluent) from new development is appropriately drained and treated in order to protect public health, amenity and environmental resources. In the majority of cases new development will be required to connect to the public sewer.

**4.17** The Council's 'Flood Risk Assessment and Drainage Impact Assessment – Planning Guidance for Developers', sets out when Drainage Impact Assessments will be required and the issues they require to cover.

## POLICY 9 – SURFACE AND WASTE WATER DRAINAGE

New build development proposals which require surface water to be drained should demonstrate that this will be achieved during construction and once completed through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters.

The provision of SuDS should be compliant with the principles set out in the SuDS Manual C753 and Sewers for Scotland 3rd edition, or any successor documents.

Where waste water drainage is required, it must be demonstrated that the development can connect to the existing public sewerage system. Where a public connection is not feasible at present, a temporary waste water drainage system can be supported if:

- i) a public connection will be available in future, either through committed sewerage infrastructure or pro-rata developer contributions; and
- ii) the design of, and maintenance arrangements for, the temporary system meet the requirements of SEPA, Scottish Water and Inverclyde Council, as appropriate.

Private sustainable sewerage systems within the countryside can be supported if it is demonstrated that they pose no amenity, health or environmental risks, either individually or cumulatively.

Developments including SuDS are required to have an acceptable maintenance plan in place.

## 5.0 CONNECTING PEOPLE AND PLACES

### Introduction

**5.1** Inverclyde has excellent transport connections; the A8 and A78 trunk roads run through the area and it has two train lines with fourteen stations, all of which connect Inverclyde with the rest of the Glasgow city-region and beyond. A number of bus companies also operate across Inverclyde, while four ferry services provide connections to various locations in Argyll and Bute. Inverclyde is also connected by a comprehensive core path network and National Cycle Network routes NCN75 and NCN753, which provide active travel connections to Renfrewshire, Glasgow and Ayrshire.

**5.2** Transport is critical to the prosperity and sustainability of our communities. Economic activity and growth relies on a transport network that enables people and goods to move efficiently around Inverclyde, Scotland and to international markets. At the same time, the need to tackle climate change by cutting transport emissions requires an approach which reduces the need to travel by car and prioritises sustainable travel modes.

**5.3** Planning can improve connectivity and promote sustainable travel by locating new development near active travel and public transport networks, thereby giving people the choice of walking, cycling or using public transport. It is also important to identify where additional transport infrastructure is needed to support new development and ensure that developers contribute toward its provision. Supporting new transport technologies, including the provision of charging points for electric vehicles, will also help reduce carbon emissions.

**5.4** Good digital connectivity allows businesses to reach their markets, and people to keep in touch and work flexibly, wherever they are.

### Promoting Sustainable and Active Travel

**5.5** The Council aims to ensure that new housing, business and industry, retail, and other commercial and community development is easily accessible, in line with the sustainable travel hierarchy: walking, cycling, public transport and cars. It will seek to achieve this by requiring all such development, proportionate to their scale and proposed use, to make the site accessible by walking and cycling, both internally and, where practicable, through links to the external path and footway network. For larger developments, where sufficient passenger numbers might be

generated, the road network will be required to be accessible by public transport, although it is recognised that the provision of services will be a commercial decision for operators. The installation of electric vehicle charging points will be encouraged in new build development, and required in larger developments.

**5.6** At the Main Issues Report stage, suggestions of improvements to transport infrastructure were received including the need for additional car parking in Kilmacolm village centre, the identification of gaps in the cycle/path network, and the need for an alternative route through Inverclyde for when there is reduced capacity on the A8 trunk road. Future developments of the transport network are to be investigated and included if required in the Local Transport Strategy and Active Travel Strategy. These strategies will identify improvements to the transport network in order to make it more efficient and promote sustainable travel. Included projects will be supported in principle, subject to consideration and mitigation of the impact of the schemes on the development opportunities and places protected by this Plan.

## POLICY 10 – PROMOTING SUSTAINABLE AND ACTIVE TRAVEL

Development proposals, proportionate to their scale and proposed use, are required to:

- a) provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, include links to the wider walking and cycling network; and
- b) include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; the green network; and historic buildings and places.



## Managing the Impact of Development on the Transport Network

**5.7** Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. In order to identify any potential capacity issues on the strategic road network (i.e. A8 & A78), the Council consulted Transport Scotland on the development opportunities identified in the Plan. The Council subsequently completed a high level impact appraisal of several large scale development proposals along the A78 in consultation with Transport Scotland, which concluded there will not be a significant cumulative impact on the trunk road network as a result of the Plan's proposals. Mitigation measures may still be required, including for the rail network, as a result of individual developments coming forward and these can be determined through the Transport Assessment process.

**5.8** To ensure that the road network continues to operate efficiently, the Council has standards in place for road development and parking, which new development is expected to comply with. This may require additional improvements to the transport network outwith the actual development site. Where this is the case, developers will be required to meet these costs.

### POLICY 11 – MANAGING IMPACT OF DEVELOPMENT ON THE TRANSPORT NETWORK

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. Development should comply with the Council's roads development guidelines and parking standards. Developers are required to provide or contribute to improvements to the transport network that are necessary as a result of the proposed development.

#### Air Quality

**5.9** As at 2018, Inverclyde does not have any Air Quality Management Areas or an air pollution reduction strategy. It does have busy transport corridors that can occasionally be congested where air quality is monitored. Some developments can directly affect air quality or change travel patterns in such a way that air quality is affected. In these instances the Council will expect an Air Quality Assessment to be undertaken and mitigation measures to be implemented.

### POLICY 12 – AIR QUALITY

Development that could have a detrimental impact on air quality, or would introduce a sensitive receptor to an area with poor air quality, will be required to be accompanied by an Air Quality Assessment, which identifies the likely impacts and sets out how these will be mitigated to an acceptable level.

#### Communications Infrastructure

**5.10** Inverclyde has good digital connectivity, with 4G mobile and superfast broadband coverage available across the majority of the area. This is of benefit to the economy and social networks and contributes towards it being an attractive place to live and invest.

### POLICY 13 – COMMUNICATIONS INFRASTRUCTURE

The Council will support new digital communication infrastructure where it is sited to avoid adverse impact on: the streetscape; the amenity and operations of existing and adjacent uses; our natural and open spaces; and historic buildings and places.



Western Ferry, Gourock



## Soils

**6.12** Inverclyde has a rich variety of soil types, ranging from prime/good quality agricultural land around Quarriers Village and Inverkip to carbon rich peatland on Duchal Moor. Soil is recognised as an important natural resource, with agricultural land important for food production and the rural economy. It also supports and influences a range of habitats, stores carbon, and helps prevent and reduce flooding by storing water.

### POLICY 15 – SOILS

Development on prime agricultural land or affecting carbon rich soils will only be supported if:

- a) it is on land allocated for development in this Local Development Plan or meets a need identified in the Strategic Development Plan;
- b) there is a specific locational need for the development;
- c) it is for small scale development directly linked to a rural business; or
- d) it is for renewable energy generation or mineral extraction, and the proposals include provision for the site to be returned to its former status.

For carbon rich soils, it will also need to be demonstrated that adverse impacts on the soil resource during the construction and operational phases of a development will be minimised and the development will not result in a net increase in CO2 emissions over its lifetime.

## Contaminated Land

**6.13** Inverclyde has a proud tradition of industrial activity, stretching from its heavy industrial past of shipbuilding to the more recent manufacturing of electronic equipment and components. Many of these industries developed at a time when environmental standards were not as stringent as they are now, and this has resulted in a number of sites across Inverclyde that are potentially contaminated. When a new use is proposed for a site it is essential that any contamination is treated to ensure that the new use can operate safely. Guidance on site investigations and remediation measures is contained in the Scottish Government's Planning Advice Note 33 'Development of Contaminated Land'.

### POLICY 16 – CONTAMINATED LAND

Development proposed on land that the Council considers to be potentially contaminated will only be supported where a survey has identified the nature and extent of any contamination present on site and set out a programme of remediation or mitigation measures that ensure that the site can be made suitable for the proposed use.

## 8.0 OUR TOWN AND LOCAL CENTRES

### Introduction

**8.1** Inverclyde is well served by a network of town and local centres offering a range of shops and services in easily accessible locations. These centres also serve important civic, cultural, commercial and leisure functions, and are important employment locations.

**8.2** Greenock is the largest town centre drawing visitors from across the authority area and beyond. It is identified as a Strategic Centre in the Clydeplan Strategic Development Plan. It offers Inverclyde's largest concentration and selection of food and non-food shopping, and a wide range of non-retail services and businesses such as a cinema, the Waterfront Leisure Centre, the McLean Museum and Art Gallery, the Beacon Arts Centre, the Greenock West College Scotland campus and a number of restaurants, pubs and nightclubs that provide evening activity. It is also an important employment hub, with a number of large offices located there. In this and previous Plans, Greenock is recognised as having a Central Area, which is the main focus for shopping activity, and an Outer Area, which is more service orientated.

**8.3** Port Glasgow town centre's role has changed in recent years from mainly convenience shopping for the town's residents to offering large format food and non-food shopping that draws shoppers from across Inverclyde.

**8.4** Gourock serves as a convenient centre for the residents of the town and to travellers and commuters making use of the ferry connections to Argyll and Bute. Its waterfront location, traditional format and concentration of independent shops and cafes mean that it also attracts day visitors from across Inverclyde and beyond. It has benefitted from recent investment in its railway station, road network and parking facilities, and from environmental improvements along the waterfront and at the pierhead.

**8.5** Local centres range from the traditional village centre of Kilmacolm, which has an attractive mix of independent traders, to the modern purpose-built local centre in Inverkip. All local centres have an important role in providing convenient services and a community focus.

### Network of Centres Strategy

**8.6** Together, our town and local centres form a network with each centre serving a specific purpose and community. The Plan seeks to manage development within and outwith these centres so that they continue to complement each other for the benefit of the whole area, whilst offering healthy competition for the benefit of customers. It does this by directing appropriate uses to the network of centres in preference to other locations and by controlling development that would have an unacceptable impact on centres within the network. This is consistent with the 'sequential approach' set out in paragraph 68 of Scottish Planning Policy. The Plan recognises and seeks to safeguard Greenock as the main town centre within Inverclyde. Residential development is encouraged within the network of centres as it contributes to footfall, activity and security.

### POLICY 22 – NETWORK OF CENTRES STRATEGY

The preferred locations for the uses set out in Schedule 6 are within the network of town and local centres identified in Schedule 7. Proposals which accord with the role and function of the network of centres as set out in Schedule 7 and the opportunities identified in Schedule 8 will be supported. Proposals for Schedule 6 uses outwith the network of centres or not conforming with the role and function of a particular centre will only be supported if it can be demonstrated that:

- a) there is not a suitable sequentially preferable opportunity;
- b) there will not be an unacceptable impact on the vibrancy, vitality or viability of other centres within the network of centres; and
- c) there are clear community or economic benefits that can be best achieved at the proposed location.

Proposals for Business (Class 4), residential and hotel uses will also be supported in town and local centres.

## SCHEDULE 6 – Uses Directed to the Network of Centres

- Shops (Class 1)
- Financial, professional and other services (Class 2)
- Food and drink (Class 3)
- Non-residential institutions (Class 10)
- Assembly and leisure (Class 11)
- Amusement arcade/centre (Sui generis)
- Betting office (Sui generis)
- Beautician/Nail bar (Sui generis)
- Hot food takeaway (Sui generis)
- Pay day loan shop (Sui generis)
- Public house (Sui generis)
- Tattoo parlour (Sui generis)
- Taxi/private hire office (Sui generis)
- Theatre (Sui generis)
- Other uses most closely associated with, or most appropriately located within town or local centres.

*(Descriptions in brackets as per Town and Country Planning (Use Classes)(Scotland) Order 1997 (as amended))*



Grey Place, Greenock

## SCHEDULE 7 – Network of Centres Strategy

Centre	Status	Role and function
<ul style="list-style-type: none"> <li>• Greenock</li> </ul>	Strategic Centre	Greenock Central Area is the preferred location for new retail development over 1,000 square metres. New retail development in the Greenock Outer Area should not exceed 1,000 square metres. Greenock town centre is the preferred location for other Schedule 6 uses with an Inverclyde-wide catchment.
<ul style="list-style-type: none"> <li>• Port Glasgow</li> <li>• Gourock</li> </ul>	Town Centre	Second preferred locations for new retail development over 1,000 square metres. Preferred location for other Schedule 6 uses with whole town catchments
<ul style="list-style-type: none"> <li>• The Cross, Kilmacolm</li> <li>• Dubbs Road, Pt Glasgow</li> <li>• Sinclair Street, Greenock</li> <li>• Lynedoch Street, Greenock</li> <li>• Barrs Cottage, Greenock</li> <li>• Cumberland Walk, Greenock</li> <li>• Cardwell Road, Gourock</li> <li>• Kip Park, Inverkip</li> <li>• Ardgowan Road, Wemyss Bay</li> <li>• Inverkip Power Station*</li> <li>• Spango Valley, Greenock*</li> </ul>	Local Centre	New retail development should not exceed 1,000 square metres. Preferred location for other Schedule 6 uses serving a local catchment.
* proposed local centre as part of comprehensive masterplan		
<ul style="list-style-type: none"> <li>• Local facilities</li> </ul>		Proposals for new Schedule 6 uses outwith the town and local centres shall not exceed 250 square metres in total.



## 10.0 OUR HISTORIC BUILDINGS AND PLACES

**10.1** Inverclyde's buildings and places chart the long history of the area. Archaeological finds evidence the occupation of the area from pre-historic through to Roman times; Newark Castle and the initial growth of our towns and villages occurred during medieval times; and the industrialisation and urbanisation of the 18<sup>th</sup> to 20<sup>th</sup> centuries shaped Inverclyde as we know it now. Inverclyde's past has gifted the present day with a rich and varied legacy of historic buildings and places which significantly contribute to the culture, character and sense of place, and which support tourism and the economy. These include conservation areas, listed buildings, scheduled monuments and other archaeological sites, and gardens and designed landscapes. As well as the policies below, the Council will have regard to Historic Environment Scotland's Policy Statement (June 2016) and any successor document, when assessing proposals affecting these historic buildings and places.

### Conservation Areas

**10.2** Inverclyde has eight conservation areas: Greenock (West End and Cathcart Square/William Street), Gourock (West Bay and Kempock Street/Shore Street), Inverkip, Kilmacolm (South East and The Cross) and Quarrier's Homes. There are Article 4 Directions associated with five of these, the exceptions being The Cross, Kilmacolm and the two Gourock conservation areas, which were designated after the General Permitted Development Order was amended to restrict permitted development in conservation areas. Article 4 Directions remove permitted development rights from the conservation areas they cover.

**10.3** Conservation Area Appraisals are useful documents for understanding the important features of conservation areas, assisting their positive management, and informing development management decisions. A Conservation Area Appraisal was completed for the Greenock West End in 2016 and it is intended that appraisals be undertaken for the other conservation areas over the lifetime of this Plan.

## POLICY 28 – CONSERVATION AREAS

Proposals for development, within or affecting the setting of a conservation area, are to preserve or enhance the character and appearance of the area. In assessing such proposals regard will be had to any relevant Conservation Area Appraisals or other information relating to the historic or architectural value of the conservation area. Where the demolition of an unlisted building is proposed, consideration will be given to the contribution the building makes to the character and appearance of the conservation area. If such a building makes a positive contribution to the area, there will be a presumption in favour of retaining it. Proposals for demolition will not be supported in the absence of a planning application for a replacement development that preserves or enhances the character and appearance of the conservation area.



Conservation Area - Main Street, Inverkip

## Listed Buildings

**10.4** Inverclyde has 247 listed buildings, details of which are available on the Council's website. Twenty-five of these are A-listed as they are of national or international importance, including Gourock Ropeworks in Port Glasgow and the Custom House and Sugar Warehouses in Greenock.

**10.5** Many listed buildings are within the ownership of the Council, and in recent years there has been significant investment made at the Greenock Municipal Buildings and Watt Memorial School, to keep or retain the listed buildings in active use and secure their future. Other buildings including the former sugar warehouses on James Watt Dock have been made wind and watertight with Council support until such times as a new and sustainable use can be found. However, there are also listed buildings within Inverclyde on the Buildings at Risk Register for Scotland. The Council will work with interested parties to find suitable future uses for these and other listed buildings.



Greenock Crematorium

## POLICY 29 – LISTED BUILDINGS

Proposals for development affecting a listed building, including its setting, are required to protect its special architectural or historical interest. In assessing proposals, due consideration will be given to how the proposals will enable the building to remain in active use.

Demolition of a listed building will not be permitted unless the building is no longer of special interest; it is clearly incapable of repair; or there are overriding environmental or economic reasons in support of its demolition. Applicants should also demonstrate that every reasonable effort has been made to secure the future of the building.



Ardgowan Bowling Club, Greenock

## **5. INVERCLYDE LOCAL DEVELOPMENT PLAN 2019 MAP EXTRACT**



**GREENOCK**



## SUSTAINABLE DEVELOPMENT STRATEGY



### POLICY 3

 Trunk Road

**POLICY 11**



## POLICY 11

Green Belt



**POLICIES  
14 & 19**



**POLICIES  
14 & 19**

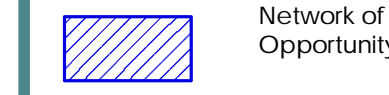
Town Centre A



**POLICY 22**



**POLICY 22**



**POLICY 22**

**Business 8** **1**



**POLICY 25**



**POLICY 26**

Conservation



**POLICY 28**

 Special Projects

**POLICY 33**



**POLICY 33**



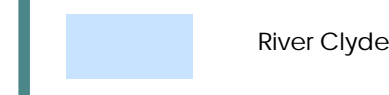
**POLICY 33**



POLICY 27



**POLICY 38**





**6. INVERCLYDE LOCAL DEVELOPMENT PLAN 2019  
SUPPLEMENTARY GUIDANCE ON PLANNING  
APPLICATION ADVICE NOTES POLICY EXTRACTS**

## Planning Application Advice Note No. 3

### PRIVATE and PUBLIC OPEN SPACE PROVISION in NEW RESIDENTIAL DEVELOPMENT

Open space provides two important functions; it contributes to “Placemaking”, providing space around and setting for buildings helping to establish the impression of an area, and it can be used to provide areas for outdoor leisure.

This Advice Note provides guidance on the required levels of public open space and private garden ground that should be included in new residential developments.

#### Types of development

No two sites are the same and residential development can range from the single house to sites in excess of 100 units. The standards required vary depending upon the scale of the development. The following definitions apply:

#### SMALL SCALE INFILL, INCLUDING SINGLE PLOTS

- 10 houses or fewer in a vacant / redevelopment site within a built up area.

#### LARGE SCALE INFILL

- more than 10 houses in a vacant / redevelopment site within a built up area.

#### GREENFIELD / EDGE OF TOWN

- the development of a site on the edge of or outside a town or village.

#### FLATTED INFILL

- the development of flats, irrespective of number of units, on a vacant / redevelopment site within a built up area.

#### FLATTED DEVELOPMENT WITHIN A LARGE SCALE INFILL OR GREENFIELD / EDGE OF TOWN SITE

- the development of flats, irrespective of number of units, as part of a larger infill development within a town or village, or on a greenfield / edge of town or village site.

#### Private Garden Ground

#### SMALL SCALE INFILL DEVELOPMENTS, INCLUDING SINGLE PLOTS

- new development should accord with the established density and pattern of development in the immediate vicinity with reference to front and rear garden sizes and distances to plot boundaries. In all instances the minimum window to window distances below should be achieved.

#### FLATTED INFILL DEVELOPMENTS

- flats should reflect the existing scale of buildings and townscape in the immediate environs. Open space need only be provided where surplus land is available following the provision of any off-street parking required.

#### LARGE SCALE (INFILL) OR GREENFIELD / EDGE OF SETTLEMENT SITE

- the following minimum sizes shall apply:
  - Rear / private garden depth - 9 metres, although where the rear garden does not back onto residential property or where dwellings in

neighbouring properties are significantly distant, this may be reduced if an area of screened side garden of size equivalent to a rear garden with a 9 metre depth can be provided.

- Front / public garden depth - 6 metres to the main wall.
- Distance from house to side boundary - 2 metres.
- Distance from house to side boundary when the house has an attached garage - 3 metres.

#### FLATTED WITHIN A LARGE SCALE INFILL OR GREENFIELD / EDGE OF SETTLEMENT SITE

- 10 square metres per bedspace based upon an occupancy rate of two persons per double bedroom and one person per single bedroom.

#### Public Open Space

In developments other than small scale infill and flattened infill sites, public open space is required to be provided to achieve both an appropriate landscape setting for the development and play space.

In such circumstances the following criteria will apply:

- Public open space should be provided at the indicative ratio of 1.64 ha per 1000 population. Population estimates are based upon occupancy rates of two persons per double bedroom and one person per single bedroom.
- It will be the responsibility of the developer to equip the play areas. Children's play areas and kickabout areas should comprise 0.32 ha per 1000 population.



## Location of Play Areas

- Play areas should be located to ensure that they are overlooked, but at the same time must be positioned at least 10 metres distant from the boundary of the nearest residence.
- Where developments are located in close proximity to established parks or play areas, the Council may, in appropriate cases, consider as an alternative to on-site provision of play equipment the supplementing, at the expense of the developer, of existing play equipment in the nearby park or play area. This, however, will not absolve the developer of the requirement to provide amenity landscaped areas to enhance the setting of the development. Toddler play provision may not be required when the developer provides flat rear/private garden depths in excess of 9 metres.

Any new open space and play provision requirements, or changes to existing requirements, identified in a future Inverclyde Greenspace Strategy will supersede those identified above.



## **7. SCOTTISH PLANNING POLICY**



# Scottish Planning Policy



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# **Scottish Planning Policy**

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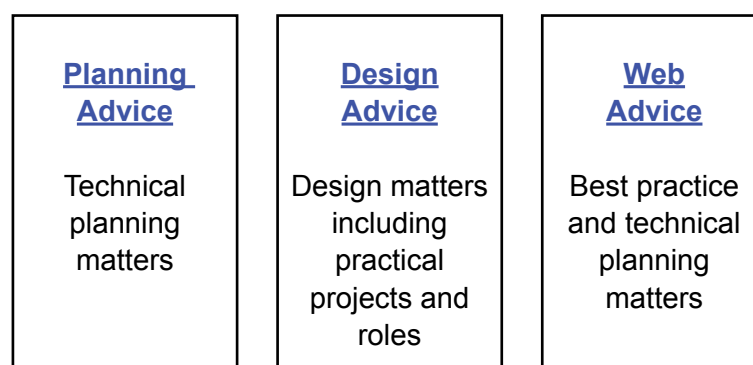
# Planning Series

The Scottish Government series of Planning and Architecture documents are material considerations in the planning system.

## Planning and Architecture Policy



## Planning and Design Advice and Guidance



Further information is available at: [www.scotland.gov.uk/planning](http://www.scotland.gov.uk/planning)

This SPP replaces SPP (2010) and Designing Places (2001)

statutory

non-statutory



# Scottish Planning Policy (SPP)

## Purpose

i. The purpose of the SPP is to set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development<sup>1</sup> and use of land. The SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances. It directly relates to:

- the preparation of development plans;
- the design of development, from initial concept through to delivery; and
- the determination of planning applications and appeals.

## Status

ii. The SPP is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country. It is non-statutory. However, Section 3D of the Town and Country Planning (Scotland) 1997 Act requires that functions relating to the preparation of the National Planning Framework by Scottish Ministers and development plans by planning authorities must be exercised with the objective of contributing to [sustainable development](#). Under the Act, Scottish Ministers are able to issue guidance on this requirement to which planning authorities must have regard. The Principal Policy on Sustainability is guidance under section 3E of the Act.

iii. The 1997 Act requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. As a statement of Ministers' priorities the content of the SPP is a material consideration that carries significant weight, though it is for the decision-maker to determine the appropriate weight in each case. Where development plans and proposals accord with this SPP, their progress through the planning system should be smoother.

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<sup>1</sup> The Planning (Scotland) Act 2006 extends the definition of development to include marine fish farms out to 12 nautical miles.

**iv.** The SPP sits alongside the following Scottish Government planning policy documents:

- the [National Planning Framework](#) (NPF)<sup>2</sup>, which provides a statutory framework for Scotland's long-term spatial development. The NPF sets out the Scottish Government's spatial development priorities for the next 20 to 30 years. The SPP sets out policy that will help to deliver the objectives of the NPF;
- [Creating Places](#)<sup>3</sup>, the policy statement on architecture and place, which contains policies and guidance on the importance of architecture and design;
- [Designing Streets](#)<sup>4</sup>, which is a policy statement putting street design at the centre of placemaking. It contains policies and guidance on the design of new or existing streets and their construction, adoption and maintenance; and
- [Circulars](#)<sup>5</sup>, which contain policy on the implementation of legislation or procedures.

**v.** The SPP should be read and applied as a whole. Where 'must' is used it reflects a legislative requirement to take action. Where 'should' is used it reflects Scottish Ministers' expectations of an efficient and effective planning system. The Principal Policies on Sustainability and Placemaking are overarching and should be applied to all development. The key documents referred to provide contextual background or more detailed advice and guidance. Unless otherwise stated, reference to Strategic Development Plans (SDP) covers Local Development Plans outwith SDP areas. The SPP does not restate policy and guidance set out elsewhere. A [glossary](#) of terms is included at the end of this document.

<sup>2</sup> [www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Framework](http://www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Framework)

<sup>3</sup> [www.scotland.gov.uk/Publications/2013/06/9811/0](http://www.scotland.gov.uk/Publications/2013/06/9811/0)

<sup>4</sup> [www.scotland.gov.uk/Publications/2010/03/22120652/0](http://www.scotland.gov.uk/Publications/2010/03/22120652/0)

<sup>5</sup> [www.scotland.gov.uk/Topics/Built-Environment/planning/publications/circulars](http://www.scotland.gov.uk/Topics/Built-Environment/planning/publications/circulars)

# Introduction

## The Planning System

1. The planning system has a vital role to play in delivering high-quality places for Scotland. Scottish Planning Policy (SPP) focuses plan making, planning decisions and development design on the Scottish Government's Purpose of creating a more successful country, with opportunities for all of Scotland to flourish, through increasing [sustainable economic growth](#).
2. Planning should take a positive approach to enabling high-quality development and making efficient use of land to deliver long-term benefits for the public while protecting and enhancing natural and cultural resources.
3. Further information and guidance on planning in Scotland is available at [www.scotland.gov.uk/planning](http://www.scotland.gov.uk/planning)<sup>6</sup>. An explanation of the planning system can be found in [A Guide to the Planning System in Scotland](#)<sup>7</sup>.

## Core Values of the Planning Service

4. Scottish Ministers expect the planning service to perform to a high standard and to pursue continuous improvement. The service should:
  - focus on outcomes, maximising benefits and balancing competing interests;
  - play a key role in facilitating sustainable economic growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience within communities;
  - be plan-led, with plans being up-to-date and relevant;
  - make decisions in a timely, transparent and fair way to provide a supportive business environment and engender public confidence in the system;
  - be inclusive, engaging all interests as early and effectively as possible;
  - be proportionate, only imposing conditions and obligations where necessary; and
  - uphold the law and enforce the terms of decisions made.

## People Make the System Work

5. The primary responsibility for the operation of the planning system lies with strategic development planning authorities, and local and national park authorities. However, all those involved with the system have a responsibility to engage and work together constructively and proportionately to achieve quality places for Scotland. This includes the Scottish Government and its agencies, public bodies, statutory consultees, elected members, communities, the general public, developers, applicants, agents, interest groups and representative organisations.

<sup>6</sup> [www.scotland.gov.uk/Topics/built-environment/planning](http://www.scotland.gov.uk/Topics/built-environment/planning)

<sup>7</sup> [www.scotland.gov.uk/Publications/2009/08/11133705/0](http://www.scotland.gov.uk/Publications/2009/08/11133705/0)

**6.** Throughout the planning system, opportunities are available for everyone to engage in the development decisions which affect them. Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged, for example charrettes or mediation initiatives. Support or concern expressed on matters material to planning should be given careful consideration in developing plans and proposals and in determining planning applications. Effective engagement can lead to better plans, better decisions and more satisfactory outcomes and can help to avoid delays in the planning process.

**7.** Planning authorities and developers should ensure that appropriate and proportionate steps are taken to engage with communities during the preparation of development plans, when development proposals are being formed and when applications for planning permission are made. Individuals and **community** groups should ensure that they focus on planning issues and use available opportunities for engaging constructively with developers and planning authorities.

**8.** Further information can be found in the following:

- [Town and Country Planning \(Scotland\) Act 1997](#)<sup>8</sup> as amended, plus associated legislation: sets out minimum requirements for consultation and engagement
- [Circular 6/2013: Development Planning](#)<sup>9</sup>
- [Circular 3/2013: Development Management Procedures](#)<sup>10</sup>
- [The Standards Commission for Scotland: Guidance on the Councillors' Code of Conduct](#)<sup>11</sup>
- [Planning Advice Note 3/2010: Community Engagement](#)<sup>12</sup>
- [A Guide to the Use of Mediation in the Planning System in Scotland \(2009\)](#)<sup>13</sup>

## Outcomes: How Planning Makes a Difference

**9.** The Scottish Government's Purpose of creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth is set out in the Government Economic Strategy. The aim is to ensure that the entire public sector is fully aligned to deliver the Purpose. The relationship of planning to the Purpose is shown on page 8.

**10.** The Scottish Government's [16 national outcomes](#)<sup>14</sup> articulate in more detail how the Purpose is to be achieved. Planning is broad in scope and cross cutting in nature and therefore contributes to the achievement of all of the national outcomes. The pursuit of these outcomes provides the impetus for other national plans, policies and strategies and many of the principles and policies set out in them are reflected in both the SPP and NPF3.

<sup>8</sup> [www.legislation.gov.uk/ukpga/1997/8/contents](http://www.legislation.gov.uk/ukpga/1997/8/contents)

<sup>9</sup> [www.scotland.gov.uk/Publications/2013/12/9924/0](http://www.scotland.gov.uk/Publications/2013/12/9924/0)

<sup>10</sup> [www.scotland.gov.uk/Publications/2013/12/9882/0](http://www.scotland.gov.uk/Publications/2013/12/9882/0)

<sup>11</sup> [www.standardscommissionscotland.org.uk/webfm\\_send/279](http://www.standardscommissionscotland.org.uk/webfm_send/279)

<sup>12</sup> [www.scotland.gov.uk/Publications/2010/08/30094454/0](http://www.scotland.gov.uk/Publications/2010/08/30094454/0)

<sup>13</sup> [www.scotland.gov.uk/Publications/2009/03/10154116/0](http://www.scotland.gov.uk/Publications/2009/03/10154116/0)

<sup>14</sup> [www.scotland.gov.uk/About/Performance/scotPerforms/outcome](http://www.scotland.gov.uk/About/Performance/scotPerforms/outcome)



# **11.** NPF3 and this SPP share a single vision for the planning system in Scotland:

We live in a Scotland with a growing, low-carbon economy with progressively narrowing disparities in well-being and opportunity. It is growth that can be achieved whilst reducing emissions and which respects the quality of environment, place and life which makes our country so special. It is growth which increases solidarity – reducing inequalities between our regions. We live in sustainable, well-designed places and homes which meet our needs. We enjoy excellent transport and digital connections, internally and with the rest of the world.

**12.** At the strategic and local level, planning can make a very important contribution to the delivery of [Single Outcome Agreements](#)<sup>15</sup>, through their shared focus on ‘place’. Effective integration between land use planning and community planning is crucial and development plans should reflect close working with [Community Planning Partnerships](#)<sup>16</sup>.

**13.** The following four planning outcomes explain how planning should support the vision. The outcomes are consistent across the NPF and SPP and focus on creating a successful sustainable place, a low carbon place, a natural, resilient place and a more connected place. For planning to make a positive difference, development plans and new development need to contribute to achieving these outcomes.

**Outcome 1: A successful, sustainable place** – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places.

**14.** NPF3 aims to strengthen the role of our city regions and towns, create more vibrant rural places, and realise the opportunities for sustainable growth and innovation in our coastal and island areas.

**15.** The SPP sets out how this should be delivered on the ground. By locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. Well-planned places promote well-being, a sense of identity and pride, and greater opportunities for social interaction. Planning therefore has an important role in promoting strong, resilient and inclusive communities. Delivering high-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live and style of home, choice as to how to access amenities and services and choice to live more active, engaged, independent and healthy lifestyles.

**16.** Good planning creates opportunities for people to contribute to a growing, adaptable and productive economy. By allocating sites and creating places that are attractive to growing economic sectors, and enabling the delivery of necessary infrastructure, planning can help provide the confidence required to secure private sector investment, thus supporting innovation, creating employment and benefiting related businesses.

**Outcome 2: A low carbon place** – reducing our carbon emissions and adapting to climate change.

<sup>15</sup> [www.scotland.gov.uk/Topics/Government/PublicServiceReform/CP/SOA2012](http://www.scotland.gov.uk/Topics/Government/PublicServiceReform/CP/SOA2012)

<sup>16</sup> [www.scotland.gov.uk/Topics/Government/PublicServiceReform/CP](http://www.scotland.gov.uk/Topics/Government/PublicServiceReform/CP)

**17.** NPF3 will facilitate the transition to a low carbon economy, particularly by supporting diversification of the energy sector. The spatial strategy as a whole aims to reduce greenhouse gas emissions and facilitate **adaptation** to climate change.

**18.** The Climate Change (Scotland) Act 2009 sets a target of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. Annual greenhouse gas emission targets are set in secondary legislation. Section 44 of the Act places a duty on every public body to act:

- in the way best calculated to contribute to the delivery of emissions targets in the Act;
- in the way best calculated to help deliver the Scottish Government's climate change adaptation programme; and
- in a way that it considers is most sustainable.

**19.** The SPP sets out how this should be delivered on the ground. By seizing opportunities to encourage mitigation and adaptation measures, planning can support the transformational change required to meet emission reduction targets and influence climate change. Planning can also influence people's choices to reduce the environmental impacts of consumption and production, particularly through energy efficiency and the reduction of waste.

**Outcome 3: A natural, resilient place** – helping to protect and enhance our natural and cultural assets, and facilitating their sustainable use.

**20.** NPF3 emphasises the importance of our environment as part of our cultural identity, an essential contributor to well-being and an economic opportunity. Our spatial strategy aims to build resilience and promotes protection and sustainable use of our world-class environmental assets.

**21.** The SPP sets out how this should be delivered on the ground. By protecting and making efficient use of Scotland's existing resources and environmental assets, planning can help us to live within our environmental limits and to pass on healthy ecosystems to future generations. Planning can help to manage and improve the condition of our assets, supporting communities in realising their aspirations for their environment and facilitating their access to enjoyment of it. By enhancing our surroundings, planning can help make Scotland a uniquely attractive place to work, visit and invest and therefore support the generation of jobs, income and wider economic benefits.

**Outcome 4: A more connected place** – supporting better transport and digital connectivity.

**22.** NPF3 reflects our continuing investment in infrastructure, to strengthen transport links within Scotland and to the rest of the world. Improved digital connections will also play a key role in helping to deliver our spatial strategy for sustainable growth.

**23.** The SPP sets out how this should be delivered on the ground. By aligning development more closely with transport and digital infrastructure, planning can improve sustainability and connectivity. Improved connections facilitate accessibility within and between places – within Scotland and beyond – and support economic growth and an inclusive society.

SG Purpose	To focus government and public services on creating a more successful country, with opportunities for all to flourish, through increasing sustainable economic growth.															
SG National Outcomes	The planning system and service contribute to all 16 National Outcomes															
SG National Plans, Policies & Strategies	Government Economic Strategy															
	Infrastructure Investment Plan															
	Scotland's Digital Future	Electricity & Heat Generation Policy Statements	2020 Challenge for Scotland's Biodiversity	Scottish Historic Environment Strategy and Policy	Housing Strategy	National Planning Framework & Scottish Planning Policy	Land Use Strategy	Low Carbon Scotland: Report of Proposals and Policies	National Marine Plan	Regeneration Strategy	National Transport Strategy					
Planning Vision	We live in a Scotland with a growing, low carbon economy with progressively narrowing disparities in well-being and opportunity. It is growth that can be achieved whilst reducing emissions and which respects the quality of environment, place and life which makes our country so special. It is growth which increases solidarity – reducing inequalities between our regions. We live in sustainable, well-designed places and homes which meet our needs. We enjoy excellent transport and digital connections, internally and with the rest of the world.															
Planning Outcomes	Planning makes Scotland a successful, sustainable place – supporting sustainable economic growth and regeneration, and the creation of well-designed places.			Planning makes Scotland a low carbon place – reducing our carbon emissions and adapting to climate change.			Planning makes Scotland a natural, resilient place – helping to protect and enhance our natural and cultural assets, and facilitating their sustainable use.			Planning makes Scotland a connected place – supporting better transport and digital connectivity.						
National Planning	National Planning Framework (NPF)															
	Sustainability			Placemaking												
	Subject Policies															
	Town Centres	Heat and Electricity		Natural Environment	Travel		Cities and Towns Rural Areas Coast and Islands National Developments									
	Rural Development	Zero Waste		Green Infrastructure	Digital Connectivity											
	Homes			Aquacultural								Minerals				
	Business & Employment	Zero Waste		Flooding & Drainage												
	Historic Environment															
	COMMUNITY PLANNING															
Strategic	Strategic Development Plans															
Local	Local Development Plans															
Site	Master Plans															

# Principal Policies

## Sustainability

### NPF and wider policy context

**24.** The Scottish Government's central purpose is to focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing [sustainable economic growth](#).

**25.** The Scottish Government's commitment to the concept of [sustainable development](#) is reflected in its Purpose. It is also reflected in the continued support for the five guiding principles set out in the UK's shared framework for sustainable development. Achieving a sustainable economy, promoting good governance and using sound science responsibly are essential to the creation and maintenance of a strong, healthy and just society capable of living within environmental limits.

**26.** The NPF is the spatial expression of the Government Economic Strategy (2011) and sustainable economic growth forms the foundations of its strategy. The NPF sits at the top of the development plan hierarchy and must be taken into account in the preparation of strategic and local development plans.

**27.** The Government Economic Strategy indicates that sustainable economic growth is the key to unlocking Scotland's potential and outlines the multiple benefits of delivering the Government's purpose, including creating a supportive business environment, achieving a low carbon economy, tackling health and social problems, maintaining a high-quality environment and passing on a sustainable legacy for future generations.

### Policy Principles

**This SPP introduces a presumption in favour of development that contributes to sustainable development.**

**28.** The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost.

**29.** This means that policies and decisions should be guided by the following principles:

- giving due weight to net economic benefit;
- responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
- supporting good design and the six qualities of successful places;
- making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;
- supporting delivery of accessible housing, business, retailing and leisure development;



- supporting delivery of infrastructure, for example transport, education, energy, digital and water;
- supporting [climate change mitigation](#) and [adaptation](#) including taking account of flood risk;
- improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;
- having regard to the principles for sustainable land use set out in the Land Use Strategy;
- protecting, enhancing and promoting access to cultural heritage, including the [historic environment](#);
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;
- reducing waste, facilitating its management and promoting resource recovery; and
- avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.

## Key Documents

- [National Planning Framework](#)<sup>17</sup>
- [Government Economic Strategy](#)<sup>18</sup>
- [Planning Reform: Next Steps](#)<sup>19</sup>
- [Getting the Best from Our Land – A Land Use Strategy for Scotland](#)<sup>20</sup>
- [UK's Shared Framework for Sustainable Development](#)<sup>21</sup>

## Delivery

### Development Planning

#### 30. Development plans should:

- be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development;
- positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area;
- be up-to-date, place-based and enabling with a spatial strategy that is implemented through policies and proposals; and
- set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.

<sup>17</sup> [www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Framework](http://www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Framework)

<sup>18</sup> [www.scotland.gov.uk/Publications/2011/09/13091128/0](http://www.scotland.gov.uk/Publications/2011/09/13091128/0)

<sup>19</sup> [www.scotland.gov.uk/Publications/2012/03/3467](http://www.scotland.gov.uk/Publications/2012/03/3467)

<sup>20</sup> [www.scotland.gov.uk/Publications/2011/03/17091927/0](http://www.scotland.gov.uk/Publications/2011/03/17091927/0)

<sup>21</sup> <http://archive.defra.gov.uk/sustainable/government/documents/SDFramework.pdf>

**31.** Action programmes should be actively used to drive delivery of planned developments: to align stakeholders, phasing, financing and infrastructure investment over the long term.

## Development Management

**32.** The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Proposals that accord with up-to-date plans should be considered acceptable in principle and consideration should focus on the detailed matters arising. For proposals that do not accord with up-to-date development plans, the primacy of the plan is maintained and this SPP and the presumption in favour of development that contributes to sustainable development will be material considerations.

**33.** Where relevant policies in a development plan are out-of-date<sup>22</sup> or the plan does not contain policies relevant to the proposal, then the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Decision-makers should also take into account any adverse impacts which would significantly and demonstrably outweigh the benefits when assessed against the wider policies in this SPP. The same principle should be applied where a development plan is more than five years old.

**34.** Where a plan is under review, it may be appropriate in some circumstances to consider whether granting planning permission would prejudice the emerging plan. Such circumstances are only likely to apply where the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new developments that are central to the emerging plan. Prematurity will be more relevant as a consideration the closer the plan is to adoption or approval.

**35.** To support the efficient and transparent handling of planning applications by planning authorities and consultees, applicants should provide good quality and timely supporting information that describes the economic, environmental and social implications of the proposal. In the spirit of planning reform, this should be proportionate to the scale of the application and planning authorities should avoid asking for additional impact appraisals, unless necessary to enable a decision to be made. Clarity on the information needed and the timetable for determining proposals can be assisted by good communication and project management, for example, use of processing agreements setting out the information required and covering the whole process including planning obligations.

<sup>22</sup> Development plans or their policies should not be considered out-of-date solely on the grounds that they were adopted prior to the publication of this SPP. However, the policies in the SPP will be a material consideration which should be taken into account when determining applications.

# Placemaking

## NPF and wider policy context

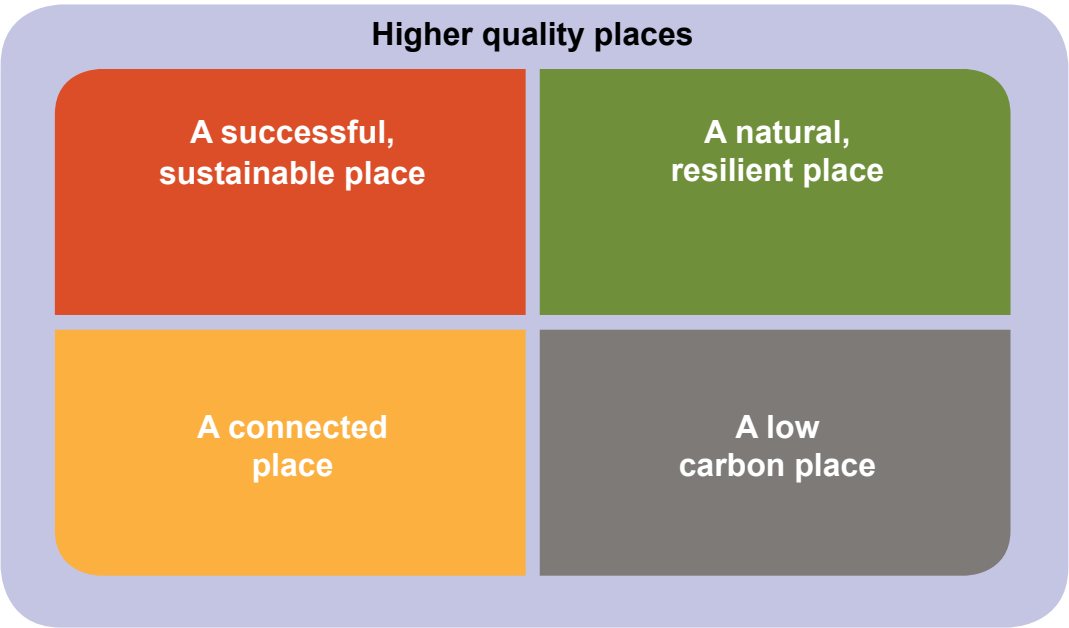
**36.** Planning’s purpose is to create better places. Placemaking is a creative, collaborative process that includes design, development, renewal or regeneration of our urban or rural built environments. The outcome should be sustainable, well-designed places and homes which meet people’s needs. The Government Economic Strategy supports an approach to place that recognises the unique contribution that every part of Scotland can make to achieving our shared outcomes. This means harnessing the distinct characteristics and strengths of each place to improve the overall quality of life for people. Reflecting this, NPF3 sets out an agenda for placemaking in our city regions, towns, rural areas, coast and islands.

**37.** The Government’s policy statement on architecture and place for Scotland, Creating Places, emphasises that quality places are successful places. It sets out the value that high-quality design can deliver for Scotland’s communities and the important role that good buildings and places play in promoting healthy, sustainable lifestyles; supporting the prevention agenda and efficiency in public services; promoting Scotland’s distinctive identity all over the world; attracting visitors, talent and investment; delivering our environmental ambitions; and providing a sense of belonging, a sense of identity and a sense of community. It is clear that places which have enduring appeal and functionality are more likely to be valued by people and therefore retained for generations to come.

## Policy Principles

**Planning should take every opportunity to create high quality places by taking a design-led approach.**

**38.** This means taking a holistic approach that responds to and enhances the existing place while balancing the costs and benefits of potential opportunities over the long term. This means considering the relationships between:



**39.** The design-led approach should be applied at all levels – at the national level in the NPF, at the regional level in strategic development plans, at the local level in local development plans and at site and individual building level within master plans that respond to how people use public spaces.

**Planning should direct the right development to the right place.**

**40.** This requires spatial strategies within development plans to promote a sustainable pattern of development appropriate to the area. To do this decisions should be guided by the following policy principles:

- optimising the use of existing resource capacities, particularly by co-ordinating housing and business development with infrastructure investment including transport, education facilities, water and drainage, energy, heat networks and digital infrastructure;
- using land within or adjacent to settlements for a mix of uses. This will also support the creation of more compact, higher density, accessible and more vibrant cores;
- considering the re-use or re-development of **brownfield land** before new development takes place on greenfield sites;
- considering whether the permanent, temporary or advanced greening of all or some of a site could make a valuable contribution to green and open space networks, particularly where it is unlikely to be developed for some time, or is unsuitable for development due to its location or viability issues; and
- locating development where investment in growth or improvement would have most benefit for the amenity of local people and the vitality of the local economy.

**Planning should support development that is designed to a high-quality, which demonstrates the six qualities of successful place.**

- ***Distinctive***

**41.** This is development that complements local features, for example landscapes, topography, ecology, skylines, spaces and scales, street and building forms, and materials to create places with a sense of identity.

- ***Safe and Pleasant***

**42.** This is development that is attractive to use because it provides a sense of security through encouraging activity. It does this by giving consideration to crime rates and providing a clear distinction between private and public space, by having doors that face onto the street creating active frontages, and by having windows that overlook well-lit streets, paths and open spaces to create natural surveillance. A pleasant, positive sense of place can be achieved by promoting visual quality, encouraging social and economic interaction and activity, and by considering the place before vehicle movement.



- **Welcoming**

**43.** This is development that helps people to find their way around. This can be by providing or accentuating landmarks to create or improve views, it can be locating a distinctive work of art to mark places such as gateways, and it can include appropriate signage and distinctive lighting to improve safety and show off attractive buildings.

- **Adaptable**

**44.** This is development that can accommodate future changes of use because there is a mix of building densities, tenures and typologies where diverse but compatible uses can be integrated. It takes into account how people use places differently, for example depending on age, gender and degree of personal mobility and providing versatile greenspace.

- **Resource Efficient**

**45.** This is development that re-uses or shares existing resources, maximises efficiency of the use of resources through natural or technological means and prevents future resource depletion, for example by mitigating and adapting to climate change. This can mean denser development that shares infrastructure and amenity with adjacent sites. It could include siting development to take shelter from the prevailing wind; or orientating it to maximise solar gain. It could also include ensuring development can withstand more extreme weather, including prolonged wet or dry periods, by working with natural environmental processes such as using landscaping and natural shading to cool spaces in built areas during hotter periods and using sustainable drainage systems to conserve and enhance natural features whilst reducing the risk of flooding. It can include using durable materials for building and landscaping as well as low carbon technologies that manage heat and waste efficiently.

- **Easy to Move Around and Beyond**

**46.** This is development that considers place and the needs of people before the movement of motor vehicles. It could include using higher densities and a mix of uses that enhance accessibility by reducing reliance on private cars and prioritising sustainable and active travel choices, such as walking, cycling and public transport. It would include paths and routes which connect places directly and which are well-connected with the wider environment beyond the site boundary. This may include providing facilities that link different means of travel.

## Key Documents

- [National Planning Framework](#)<sup>23</sup>
- [Getting the Best from Our Land – A Land Use Strategy for Scotland](#)<sup>24</sup>
- [Creating Places –A Policy Statement on Architecture and Place for Scotland](#)<sup>25</sup>
- [Designing Streets](#)<sup>26</sup>
- [Planning Advice Note 77: Designing Safer Places](#)<sup>27</sup>
- [Green Infrastructure: Design and Placemaking](#)<sup>28</sup>

23 [www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Framework](http://www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Framework)

24 [www.scotland.gov.uk/Publications/2011/03/17091927/0](http://www.scotland.gov.uk/Publications/2011/03/17091927/0)

25 [www.scotland.gov.uk/Publications/2013/06/9811/0](http://www.scotland.gov.uk/Publications/2013/06/9811/0)

26 [www.scotland.gov.uk/Publications/2010/03/22120652/0](http://www.scotland.gov.uk/Publications/2010/03/22120652/0)

27 [www.scotland.gov.uk/Publications/2006/03/08094923/0](http://www.scotland.gov.uk/Publications/2006/03/08094923/0)

28 [www.scotland.gov.uk/Publications/2011/11/04140525/0](http://www.scotland.gov.uk/Publications/2011/11/04140525/0)

## Delivery

**47.** Planning should adopt a consistent and relevant approach to the assessment of design and place quality such as that set out in the forthcoming Scottish Government Place Standard.

## Development Planning

**48.** Strategic and local development plans should be based on spatial strategies that are deliverable, taking into account the scale and type of development pressure and the need for growth and regeneration. An urban capacity study, which assesses the scope for development within settlement boundaries, may usefully inform the spatial strategy, and local authorities should make use of land assembly, including the use of [compulsory purchase powers](#)<sup>29</sup> where appropriate. Early discussion should take place between local authorities, developers and relevant agencies to ensure that investment in necessary new infrastructure is addressed in a timely manner.

**49.** For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. However, where the planning authority considers it appropriate, the development plan may designate a green belt around a city or town to support the spatial strategy by:

- directing development to the most appropriate locations and supporting regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and
- protecting and providing access to open space.

**50.** In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

**51.** The spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local development plans should show the detailed boundary of any green belt, giving consideration to:

- excluding existing settlements and major educational and research uses, major businesses and industrial operations, airports and Ministry of Defence establishments;
- the need for development in smaller settlements within the green belt, where appropriate leaving room for expansion;
- redirecting development pressure to more suitable locations; and
- establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads<sup>30</sup>. Hedges and field enclosures will rarely provide a sufficiently robust boundary.

**52.** Local development plans should describe the types and scales of development which would be appropriate within a green belt. These may include:

- development associated with agriculture, including the reuse of historic agricultural buildings;
- development associated with woodland and forestry, including community woodlands;
- horticulture, including market gardening and directly connected retailing;

<sup>29</sup> [www.scotland.gov.uk/Topics/archive/National-Planning-Policy/themes/ComPur](http://www.scotland.gov.uk/Topics/archive/National-Planning-Policy/themes/ComPur)

<sup>30</sup> Note: where a main road forms a green belt boundary, any proposed new accesses would still require to meet the usual criteria.

- recreational uses that are compatible with an agricultural or natural setting;
- essential infrastructure such as digital communications infrastructure and electricity grid connections;
- development meeting a national requirement or established need, if no other suitable site is available; and
- intensification of established uses subject to the new development being of a suitable scale and form.

**53.** The creation of a new settlement may occasionally be a necessary part of a spatial strategy, where it is justified either by the scale and nature of the housing land requirement and the existence of major constraints to the further growth of existing settlements, or by its essential role in promoting regeneration or rural development.

**54.** Where a development plan spatial strategy indicates that a new settlement is appropriate, it should specify its scale and location, and supporting infrastructure requirements, particularly where these are integral to the viability and deliverability of the proposed development. Supplementary guidance can address more detailed issues such as design and delivery.

**55.** Local development plans should contribute to high-quality places by setting out how they will embed a design-led approach. This should include:

- reference to the six qualities of successful places which enable consideration of each place as distinctly different from other places and which should be evident in all development;
- using processes that harness and utilise the knowledge of communities and encourage active participation to deliver places with local integrity and relevance; and
- specifying when design tools, such as those at paragraph 57 should be used.

## **Development Management**

**56.** Design is a material consideration in determining planning applications. Planning permission may be refused and the refusal defended at appeal or local review solely on design grounds.

## **Tools for Making Better Places**

**57.** Design tools guide the quality of development in and across places to promote positive change. They can help to provide certainty for stakeholders as a contribution to sustainable economic growth. Whichever tools are appropriate to the task, they should focus on delivering the six qualities of successful places and could be adopted as supplementary guidance.

Scale	Tool
<div>STRATEGIC</div> <div>↑</div>	<b>Design Frameworks</b> For larger areas of significant change, so must include some flexibility. To address major issues in a co-ordinated and viable way. May include general principles as well as maps and diagrams to show the importance of connections around and within a place.
	<b>Development Briefs</b> For a place or site, to form the basis of dialogue between the local authority and developers. To advise how policies should be implemented. May include detail on function, layout, plot sizes, building heights and lines, and materials.
	<b>Master Plans</b> For a specific site that may be phased so able to adapt over time. To describe and illustrate how a proposal will meet the vision and how it will work on the ground. May include images showing the relationship of people and place. See <a href="#">Planning Advice Note 83: Masterplanning</a> <sup>31</sup>
	<b>Design Guides</b> For a particular subject, e.g. shop fronts. To show how development can be put into practice in line with policy. Includes detail, e.g. images of examples.
<div>↓</div> <div>SITE SPECIFIC</div>	<b>Design Statements</b> Required to accompany some planning applications. To explain how the application meets policy and guidance, for example by close reference to key considerations of street design with Designing Streets. See <a href="#">Planning Advice Note 68: Design Statements</a> <sup>32</sup>

31 [www.scotland.gov.uk/Publications/2008/11/10114526/0](http://www.scotland.gov.uk/Publications/2008/11/10114526/0)

32 [www.scotland.gov.uk/Publications/2003/08/18013/25389](http://www.scotland.gov.uk/Publications/2003/08/18013/25389)



# Subject Policies

## A Successful, Sustainable Place

### Promoting Town Centres

#### NPF and wider context

**58.** NPF3 reflects the importance of town centres as a key element of the economic and social fabric of Scotland. Much of Scotland's population lives and works in towns, within city regions, in our rural areas and on our coasts and islands. Town centres are at the heart of their communities and can be hubs for a range of activities. It is important that planning supports the role of town centres to thrive and meet the needs of their residents, businesses and visitors for the 21st century.

**59.** The town centre first principle, stemming from the Town Centre Action Plan, promotes an approach to wider decision-making that considers the health and vibrancy of town centres.

#### Policy Principles

**60.** Planning for town centres should be flexible and proactive, enabling a wide range of uses which bring people into town centres. The planning system should:

- apply a town centre first policy<sup>33</sup> when planning for uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities;
- encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening;
- ensure development plans, decision-making and monitoring support successful town centres; and
- consider opportunities for promoting residential use within town centres where this fits with local need and demand.

#### Key Documents

- [National Review of Town Centres External Advisory Group Report: Community and Enterprise in Scotland's Town Centres](#)<sup>34</sup>
- [Town Centre Action Plan – the Scottish Government response](#)<sup>35</sup>
- [Planning Advice Note 59: Improving Town Centres](#)<sup>36</sup>
- [Planning Advice Note 52: Planning and Small Towns](#)<sup>37</sup>

<sup>33</sup> A town centre first policy is intended to support town centres, where these exist, or new centres which are supported by the development plan. Where there are no town centres in the vicinity, for example in more remote rural and island areas, the expectation is that local centres will be supported. The town centre first policy is not intended to divert essential services and developments away from such rural areas. See section on Rural Development.

<sup>34</sup> [www.scotland.gov.uk/Resource/0042/00426972.pdf](http://www.scotland.gov.uk/Resource/0042/00426972.pdf)

<sup>35</sup> [www.scotland.gov.uk/Publications/2013/11/6415](http://www.scotland.gov.uk/Publications/2013/11/6415)

<sup>36</sup> [www.scotland.gov.uk/Publications/1999/10/pan59-root/pan59](http://www.scotland.gov.uk/Publications/1999/10/pan59-root/pan59)

<sup>37</sup> [www.scotland.gov.uk/Publications/1997/04/pan52](http://www.scotland.gov.uk/Publications/1997/04/pan52)

- [Town Centres Masterplanning Toolkit](#)<sup>38</sup>

## Development Plans

**61.** Plans should identify a network of centres and explain how they can complement each other. The network is likely to include city centres, town centres, local centres and commercial centres and may be organised as a hierarchy. Emerging or new centres designated within key new developments or land releases should also be shown within the network of centres. In remoter rural and island areas, it may not be necessary to identify a network.

**62.** Plans should identify as town centres those centres which display:

- a diverse mix of uses, including shopping;
- a high level of accessibility;
- qualities of character and identity which create a sense of place and further the well-being of communities;
- wider economic and social activity during the day and in the evening; and
- integration with residential areas.

**63.** Plans should identify as commercial centres those centres which have a more specific focus on retailing and/or leisure uses, such as shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres. Where necessary to protect the role of town centres, plans should specify the function of commercial centres, for example where retail activity may be restricted to the sale of bulky goods.

**64.** Local authorities, working with community planning partners, businesses and community groups as appropriate, should prepare a town centre health check. Annex A sets out a range of indicators which may be relevant. The purpose of a health check is to assess a town centre's strengths, vitality and viability, weaknesses and resilience. It will be used to inform development plans and decisions on planning applications. Health checks should be regularly updated, to monitor town centre performance, preferably every two years.

**65.** Local authorities, working with partners, should use the findings of the health check to develop a strategy to deliver improvements to the town centre. Annex A contains guidance on key elements in their preparation.

**66.** The spatial elements of town centre strategies should be included in the development plan or supplementary guidance. Plans should address any significant changes in the roles and functions of centres over time, where change is supported by the results of a health check. Plans should assess how centres can accommodate development and identify opportunities.

**67.** There are concerns about the number and clustering of some non-retail uses, such as betting offices and high interest money lending premises, in some town and local centres. Plans should include policies to support an appropriate mix of uses in town centres, local centres and high streets. Where a town centre strategy indicates that further provision of particular activities would undermine the character and amenity of centres or the well-being of communities, plans should include policies to prevent such over-provision and clustering.

<sup>38</sup> <http://creatingplacescotland.org/people-communities/policy/town-centre-masterplanning-toolkit#overlay-context=people-communities/policy>

**68.** Development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities. This requires that locations are considered in the following order of preference:

- town centres (including city centres and local centres);
- edge of town centre;
- other commercial centres identified in the development plan; and
- out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes.

**69.** Planning authorities, developers, owners and occupiers should be flexible and realistic in applying the sequential approach, to ensure that different uses are developed in the most appropriate locations. It is important that community, education and healthcare facilities are located where they are easily accessible to the communities that they are intended to serve.

## Development Management

**70.** Decisions on development proposals should have regard to the context provided by the network of centres identified in the development plan and the sequential approach outlined above. New development in a town centre should contribute to providing a range of uses and should be of a scale which is appropriate to that centre. The impact of new development on the character and amenity of town centres, local centres and high streets will be a material consideration in decision-making. The aim is to recognise and prioritise the importance of town centres and encourage a mix of developments which support their vibrancy, vitality and viability. This aim should also be taken into account in decisions concerning proposals to expand or change the use of existing development.

**71.** Where development proposals in edge of town centre, commercial centre or out-of-town locations are contrary to the development plan, it is for applicants to demonstrate that more central options have been thoroughly assessed and that the impact on existing town centres is acceptable. Where a new public building or office with a gross floorspace over 2,500m<sup>2</sup> is proposed outwith a town centre, and is contrary to the development plan, an assessment of the impact on the town centre should be carried out. Where a retail and leisure development with a gross floorspace over 2,500m<sup>2</sup> is proposed outwith a town centre, contrary to the development plan, a retail impact analysis should be undertaken. For smaller retail and leisure proposals which may have a significant impact on vitality and viability, planning authorities should advise when retail impact analysis is necessary.

**72.** This analysis should consider the relationship of the proposed development with the network of centres identified in the development plan. Where possible, authorities and developers should agree the data required and present information on areas of dispute in a succinct and comparable form. Planning authorities should consider the potential economic impact of development and take into account any possible displacement effect.

**73.** Out-of-centre locations should only be considered for uses which generate significant footfall<sup>39</sup> where:

- all town centre, edge of town centre and other commercial centre options have been assessed and discounted as unsuitable or unavailable;

<sup>39</sup> As noted at paragraph 69, a flexible approach is required for community, education and healthcare facilities.

- the scale of development proposed is appropriate, and it has been shown that the proposal cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location;
- the proposal will help to meet qualitative or quantitative deficiencies; and
- there will be no significant adverse effect on the vitality and viability of existing town centres.

## Promoting Rural Development

### NPF Context

**74.** NPF3 sets out a vision for vibrant rural, coastal and island areas, with growing, sustainable communities supported by new opportunities for employment and education. The character of rural and island areas and the challenges they face vary greatly across the country, from pressurised areas of countryside around towns and cities to more remote and sparsely populated areas. Between these extremes are extensive intermediate areas under varying degrees of pressure and with different kinds of environmental assets meriting protection. Scotland's long coastline is an important resource both for development and for its particular environmental quality, especially in the areas of the three island councils.

### Policy Principles

**75.** The planning system should:

- in all rural and island areas promote a pattern of development that is appropriate to the character of the particular rural area and the challenges it faces;
- encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality; and
- support an integrated approach to coastal planning.

### Key documents

- [Getting the Best from Our Land – A Land Use Strategy for Scotland](#)<sup>40</sup>
- National Marine Plan

### Delivery

**76.** In the pressurised areas easily accessible from Scotland's cities and main towns, where ongoing development pressures are likely to continue, it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside, particularly where there are environmental assets such as sensitive landscapes or good quality agricultural land. Plans should make provision for most new urban development to take place within, or in planned extensions to, existing settlements.

**77.** In remote and fragile areas and island areas outwith defined small towns, the emphasis should be on maintaining and growing communities by encouraging development that provides suitable sustainable economic activity, while preserving important environmental assets such as landscape and wildlife habitats that underpin continuing tourism visits and quality of place.

**78.** In the areas of intermediate accessibility and pressure for development, plans should be tailored to local circumstances, seeking to provide a sustainable network of settlements and a

<sup>40</sup> [www.scotland.gov.uk/Publications/2011/03/17091927/0](http://www.scotland.gov.uk/Publications/2011/03/17091927/0)



range of policies that provide for additional housing requirements, economic development, and the varying proposals that may come forward, while taking account of the overarching objectives and other elements of the plan.

**79.** Plans should set out a spatial strategy which:

- reflects the development pressures, environmental assets, and economic needs of the area, reflecting the overarching aim of supporting diversification and growth of the rural economy;
- promotes economic activity and diversification, including, where appropriate, sustainable development linked to tourism and leisure, forestry, farm and croft diversification and aquaculture, nature conservation, and renewable energy developments, while ensuring that the distinctive character of the area, the service function of small towns and natural and cultural heritage are protected and enhanced;
- makes provision for housing in rural areas in accordance with the spatial strategy, taking account of the different development needs of local communities;
- where appropriate, sets out policies and proposals for leisure accommodation, such as holiday units, caravans, and [huts](#);
- addresses the resource implications of the proposed pattern of development, including facilitating access to local community services and support for public transport; and
- considers the services provided by the natural environment, safeguarding land which is highly suitable for particular uses such as food production or flood management.

**80.** Where it is necessary to use good quality land for development, the layout and design should minimise the amount of such land that is required. Development on [prime agricultural land](#), or land of lesser quality that is locally important should not be permitted except where it is essential:

- as a component of the settlement strategy or necessary to meet an established need, for example for essential infrastructure, where no other suitable site is available; or
- for small-scale development directly linked to a rural business; or
- for the generation of energy from a renewable source or the extraction of minerals where this accords with other policy objectives and there is secure provision for restoration to return the land to its former status.

**81.** In accessible or pressured rural areas, where there is a danger of unsustainable growth in long-distance car-based commuting or suburbanisation of the countryside, a more restrictive approach to new housing development is appropriate, and plans and decision-making should generally:

- guide most new development to locations within or adjacent to settlements; and
- set out the circumstances in which new housing outwith settlements may be appropriate, avoiding use of occupancy restrictions.

**82.** In some most pressured areas, the designation of green belts may be appropriate.

**83.** In remote rural areas, where new development can often help to sustain fragile communities, plans and decision-making should generally:

- encourage sustainable development that will provide employment;
- support and sustain fragile and dispersed communities through provision for appropriate development, especially housing and community-owned energy;

- include provision for small-scale housing<sup>41</sup> and other development which supports sustainable economic growth in a range of locations, taking account of environmental protection policies and addressing issues of location, access, siting, design and environmental impact;
- where appropriate, allow the construction of single houses outwith settlements provided they are well sited and designed to fit with local landscape character, taking account of landscape protection and other plan policies;
- not impose occupancy restrictions on housing.

## National Parks

**84.** National Parks are designated under the National Parks (Scotland) Act 2000 because they are areas of national importance for their natural and cultural heritage. The four aims of national parks are to:

- conserve and enhance the natural and cultural heritage of the area;
- promote sustainable use of the natural resources of the area;
- promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
- promote sustainable economic and social development of the area's communities.

**85.** These aims are to be pursued collectively. However if there is a conflict between the first aim and any of the others then greater weight must be given to the first aim. Planning decisions should reflect this weighting. Paragraph 213 also applies to development outwith a National Park that affects the Park.

**86.** Development plans for National Parks are expected to be consistent with the National Park Plan, which sets out the management strategy for the Park. The authority preparing a development plan for a National Park, or which affects a National Park, is required to pay special attention to the desirability of consistency with the National Park Plan, having regard to the contents.

## Coastal Planning

**87.** The planning system should support an integrated approach to coastal planning to ensure that development plans and regional marine plans are complementary. Terrestrial planning by planning authorities overlaps with marine planning in the intertidal zone. On the terrestrial side, mainland planning authorities should work closely with neighbouring authorities, taking account of the needs of port authorities and aquaculture, where appropriate. On the marine side, planning authorities will need to ensure integration with policies and activities arising from the National Marine Plan, Marine Planning Partnerships, Regional Marine Plans, and Integrated Coastal Zone Management, as well as aquaculture.

## Development Plans

**88.** Plans should recognise that rising sea levels and more extreme weather events resulting from climate change will potentially have a significant impact on coastal and island areas, and that a precautionary approach to flood risk should be taken. They should confirm that new development requiring new defences against coastal erosion or coastal flooding will not be supported except where there is a clear justification for a departure from the general policy to

<sup>41</sup> including clusters and groups; extensions to existing clusters and groups; replacement housing; plots for self build; holiday homes; new build or conversion linked to rural business.

avoid development in areas at risk. Where appropriate, development plans should identify areas at risk and areas where a managed realignment of the coast would be beneficial.

**89.** Plans should identify areas of largely developed coast that are a major focus of economic or recreational activity that are likely to be suitable for further development; areas subject to significant constraints; and largely unspoiled areas of the coast that are generally unsuitable for development. It should be explained that this broad division does not exclude important local variations, for example where there are areas of environmental importance within developed estuaries, or necessary developments within the largely unspoiled coast where there is a specific locational need, for example for defence purposes, tourism developments of special significance, or essential onshore developments connected with offshore energy projects or (where appropriate) aquaculture.

**90.** Plans should promote the developed coast as the focus of developments requiring a coastal location or which contribute to the economic regeneration or well-being of communities whose livelihood is dependent on marine or coastal activities. They should provide for the development requirements of uses requiring a coastal location, including ports and harbours, tourism and recreation, fish farming, land-based development associated with offshore energy projects and specific defence establishments.

**91.** Plans should safeguard unspoiled sections of coast which possess special environmental or cultural qualities, such as wild land. The economic value of these areas should be considered and maximised, provided that environmental impact issues can be satisfactorily addressed.

## Supporting Business and Employment

### NPF Context

**92.** NPF3 supports the many and varied opportunities for planning to support business and employment. These range from a focus on the role of cities as key drivers of our economy, to the continuing need for diversification of our rural economy to strengthen communities and retain young people in remote areas. Planning should address the development requirements of businesses and enable key opportunities for investment to be realised. It can support sustainable economic growth by providing a positive policy context for development that delivers economic benefits.

### Policy Principles

**93.** The planning system should:

- promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets;
- allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities; and
- give due weight to net economic benefit of proposed development.

### Key Documents

- [Government Economic Strategy](#)<sup>42</sup>

<sup>42</sup> [www.scotland.gov.uk/Topics/Economy/EconomicStrategy](http://www.scotland.gov.uk/Topics/Economy/EconomicStrategy)

- [Tourism Development Framework for Scotland](#)<sup>43</sup>
- [A Guide to Development Viability](#)<sup>44</sup>

## Delivery

### Development Planning

**94.** Plans should align with relevant local economic strategies. These will help planning authorities to meet the needs and opportunities of indigenous firms and inward investors, recognising the potential of key sectors for Scotland with particular opportunities for growth, including:

- energy;
- life sciences, universities and the creative industries;
- tourism and the food and drink sector;
- financial and business services.

**95.** Plans should encourage opportunities for home-working, live-work units, micro-businesses and community hubs.

**96.** Development plans should support opportunities for integrating efficient energy and waste innovations within business environments. Industry stakeholders should engage with planning authorities to help facilitate co-location, as set out in paragraph 179.

**97.** Strategic development plan policies should reflect a robust evidence base in relation to the existing principal economic characteristics of their areas, and any anticipated change in these.

**98.** Strategic development plans should identify an appropriate range of locations for significant business clusters. This could include sites identified in the [National Renewables Infrastructure Plan](#)<sup>45</sup>, [Enterprise Areas](#)<sup>46</sup>, business parks, science parks, large and medium-sized industrial sites and high amenity sites.

**99.** Strategic development plans and local development plans outwith SDP areas should identify any nationally important clusters of industries [handling hazardous substances](#) within their areas and safeguard them from development which, either on its own or in combination with other development, would compromise their continued operation or growth potential. This is in the context of the wider statutory requirements in the Town and Country Planning (Development Planning) (Scotland) Regulations 2009<sup>47</sup> to have regard to the need to maintain appropriate distances between sites with hazardous substances and areas where the public are likely to be present and areas of particular natural sensitivity or interest.

**100.** Development plans should be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies. Strategic development plans should identify and safeguard any nationally or regionally important locations for tourism or recreation development within their areas.

43 [www.visitscotland.org/pdf/Tourism%20Development%20Framework%20-%20FINAL.pdf](http://www.visitscotland.org/pdf/Tourism%20Development%20Framework%20-%20FINAL.pdf)

44 [www.scotland.gov.uk/Resource/Doc/212607/0109620.pdf](http://www.scotland.gov.uk/Resource/Doc/212607/0109620.pdf)

45 [www.scottish-enterprise.com/~media/SE/Resources/Documents/Sectors/Energy/energy-renewables-reports/National-renewables-infrastructure-plan.ashx](http://www.scottish-enterprise.com/~media/SE/Resources/Documents/Sectors/Energy/energy-renewables-reports/National-renewables-infrastructure-plan.ashx)

46 [www.scotland.gov.uk/Topics/Economy/EconomicStrategy/Enterprise-Areas](http://www.scotland.gov.uk/Topics/Economy/EconomicStrategy/Enterprise-Areas)

47 These statutory requirements are due to be amended in 2015 as part of the implementation of Directive 2012/18/EU on the control of major-accident hazards involving dangerous substances.



**101.** Local development plans should allocate a range of sites for business, taking account of current market demand; location, size, quality and infrastructure requirements; whether sites are serviced or serviceable within five years; the potential for a mix of uses; their accessibility to transport networks by walking, cycling and public transport and their integration with and access to existing transport networks. The allocation of such sites should be informed by relevant economic strategies and business land audits in respect of land use classes 4, 5 and 6.

**102.** Business land audits should be undertaken regularly by local authorities to inform reviews of development plans, and updated more frequently if relevant. Business land audits should monitor the location, size, planning status, existing use, neighbouring land uses and any significant land use issues (e.g. underused, vacant, derelict) of sites within the existing business land supply.

**103.** New sites should be identified where existing sites no longer meet current needs and market expectations. Where existing business sites are underused, for example where there has been an increase in vacancy rates, reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site.

**104.** Local development plans should locate development which generates significant freight movements, such as manufacturing, processing, distribution and warehousing, on sites accessible to suitable railheads or harbours or the strategic road network. Through appraisal, care should be taken in locating such development to minimise any impact on congested, inner urban and residential areas.

**105.** Planning authorities should consider the potential to promote opportunities for tourism and recreation facilities in their development plans. This may include new developments or the enhancement of existing facilities.

## Development Management

**106.** Efficient handling of planning applications should be a key priority, particularly where jobs and investment are involved. To assist with this, pre-application discussions are strongly encouraged to determine the information that should be submitted to support applications. Such information should be proportionate and relevant to the development and sufficient for the planning authority requirements on matters such as the number of jobs to be created, hours of working, transport requirements, environmental effects, noise levels and the layout and design of buildings. Decisions should be guided by the principles set out in paragraphs 28 to 35.

**107.** Proposals for development in the vicinity of [major-accident hazard sites](#) should take into account the potential impacts on the proposal and the major-accident hazard site of being located in proximity to one another. Decisions should be informed by the Health and Safety Executive's advice, based on the [PADHI](#) tool. Similar considerations apply in respect of development proposals near licensed explosive sites (including military explosive storage sites).

**108.** Proposals for business, industrial and service uses should take into account surrounding sensitive uses, areas of particular natural sensitivity or interest and local amenity, and make a positive contribution towards placemaking.

# Enabling Delivery of New Homes

## NPF Context

**109.** NPF3 aims to facilitate new housing development, particularly in areas within our cities network where there is continuing pressure for growth, and through innovative approaches to rural housing provision. House building makes an important contribution to the economy. Planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development. In particular, provision for new homes should be made in areas where economic investment is planned or there is a need for regeneration or to support population retention in rural and island areas.

## Policy Principles

**110.** The planning system should:

- identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;
- enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and
- have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

## Key Documents

- [The Housing \(Scotland\) Act 2001](#)<sup>48</sup> requires local authorities to prepare a local housing strategy supported by an assessment of housing need and demand
- [Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits](#)<sup>49</sup>

## Delivery

**111.** Local authorities should identify functional housing market areas, i.e. geographical areas where the demand for housing is relatively self-contained. These areas may significantly overlap and will rarely coincide with local authority boundaries. They can be dynamic and complex, and can contain different tiers of sub-market area, overlain by mobile demand, particularly in city regions.

**112.** Planning for housing should be undertaken through joint working by housing market partnerships, involving both housing and planning officials within local authorities, and cooperation between authorities where strategic planning responsibilities and/or housing market areas are shared, including national park authorities. Registered social landlords, developers, other specialist interests, and local communities should also be encouraged to engage with housing market partnerships. In rural or island areas where there is no functional housing market area, the development plan should set out the most appropriate approach for the area.

<sup>48</sup> [www.legislation.gov.uk/asp/2001/10/contents](http://www.legislation.gov.uk/asp/2001/10/contents)

<sup>49</sup> [www.scotland.gov.uk/Publications/2010/08/31111624/0](http://www.scotland.gov.uk/Publications/2010/08/31111624/0)

## Development Planning

**113.** Plans should be informed by a robust housing need and demand assessment (HNDA), prepared in line with the Scottish Government's HNDA Guidance<sup>50</sup>. This assessment provides part of the evidence base to inform both local housing strategies and development plans (including the main issues report). It should produce results both at the level of the functional housing market area and at local authority level, and cover all tenures. Where the Scottish Government is satisfied that the HNDA is robust and credible, the approach used will not normally be considered further at a development plan examination.

**114.** The HNDA, development plan, and local housing strategy processes should be closely aligned, with joint working between housing and planning teams. Local authorities may wish to wait until the strategic development plan is approved in city regions, and the local development plan adopted elsewhere, before finalising the local housing strategy, to ensure that any modifications to the plans can be reflected in local housing strategies, and in local development plans in the city regions.

**115.** Plans should address the supply of land for all housing. They should set out the [housing supply target](#) (separated into affordable and market sector) for each functional housing market area, based on evidence from the HNDA. The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan and local housing strategy, taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks. The target should be reasonable, should properly reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence. The authority's housing supply target should also be reflected in the local housing strategy.

**116.** Within the overall housing supply target<sup>51</sup>, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.

**117.** The housing land requirement can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations, and in some cases a proportion of windfall development. Any assessment of the expected contribution to the housing land requirement from [windfall sites](#) must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends. In urban areas this should be informed by an urban capacity study.

**118.** Strategic development plans should set out the [housing supply target](#) and the housing land requirement for the plan area, each local authority area, and each functional housing market area. They should also state the amount and broad locations of land which should be allocated in local development plans to meet the housing land requirement up to year 12 from the expected year of plan approval, making sure that the requirement for each housing market area is met in full. Beyond year 12 and up to year 20, the strategic development plan should provide an indication of the possible scale and location of housing land, including by local development plan area.

<sup>50</sup> [www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/chma/hnda](http://www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/chma/hnda)

<sup>51</sup> Note: the housing supply target may in some cases include a contribution from other forms of delivery, for example a programme to bring empty properties back into use.

**119.** Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.

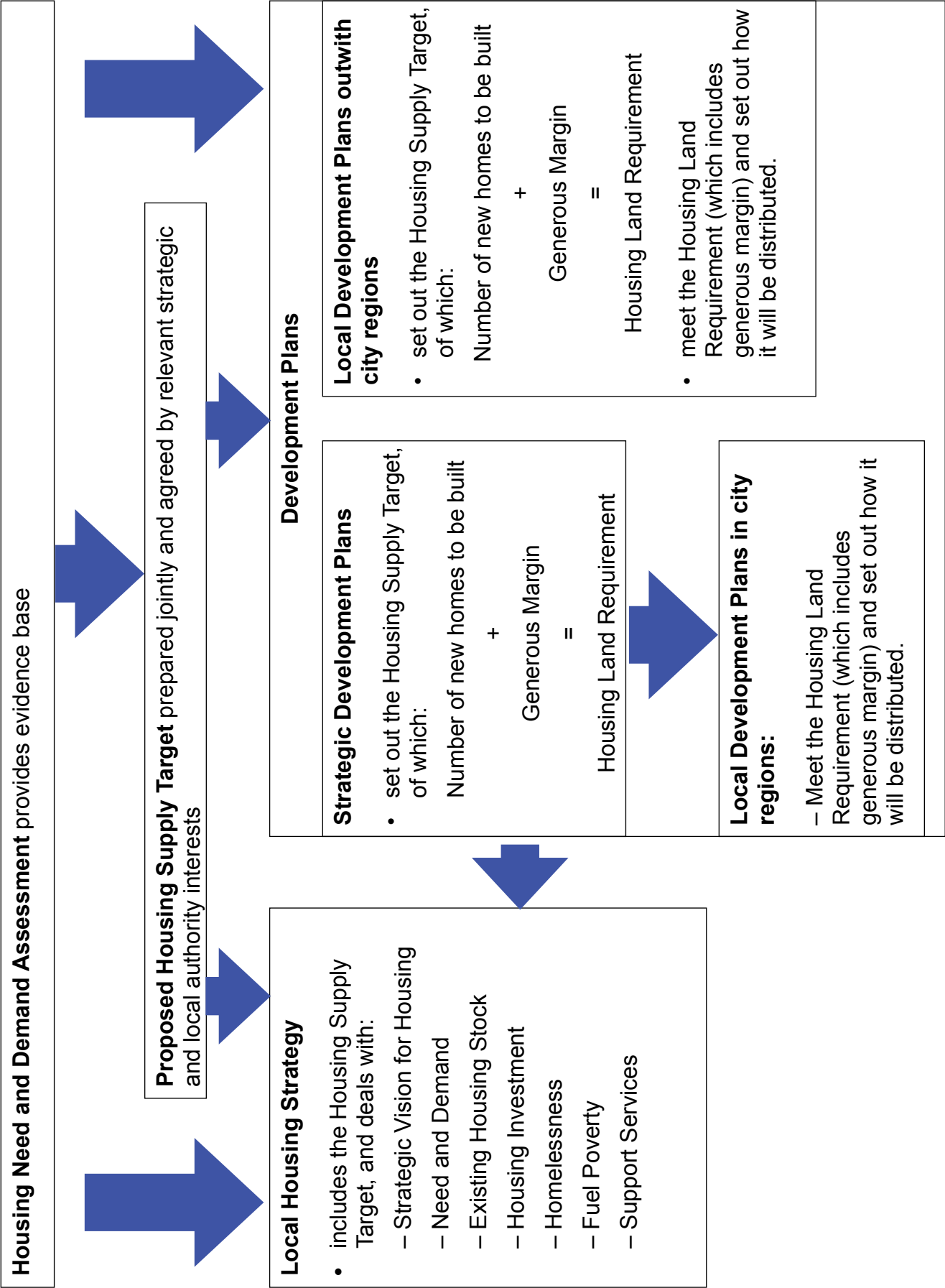
**120.** Outwith city regions, local development plans should set out the housing supply target (separated into affordable and market sector) and the housing land requirement for each housing market area in the plan area up to year 10 from the expected year of adoption. They should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement in full. They should provide a minimum of 5 years effective land supply at all times. Beyond year 10 and up to year 20, the local development plan should provide an indication of the possible scale and location of the housing land requirement.

**121.** In the National Parks, local development plans should draw on the evidence provided by the HNDAs of the constituent housing authorities. National Park authorities should aim to meet the housing land requirement in full in their area. However, they are not required to do so, and they should liaise closely with neighbouring planning authorities to ensure that any remaining part of the housing land requirement for the National Parks is met in immediately adjoining housing market areas, and that a 5-year supply of effective land is maintained.

**122.** Local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing.



Diagram 1: Housing Land, Development Planning and the Local Housing Strategy



## Maintaining a 5-year Effective Land Supply

**123.** Planning authorities should actively manage the housing land supply. They should work with housing and infrastructure providers to prepare an annual housing land audit as a tool to critically review and monitor the availability of effective housing land, the progress of sites through the planning process, and housing completions, to ensure a generous supply of land for house building is maintained and there is always enough effective land for at least five years. A site is only considered effective where it can be demonstrated that within five years it will be free of constraints<sup>52</sup> and can be developed for housing. In remoter rural areas and island communities, where the housing land requirement and market activity are of a more limited scale, the housing land audit process may be adapted to suit local circumstances.

**124.** The development plan action programme, prepared in tandem with the plan, should set out the key actions necessary to bring each site forward for housing development and identify the lead partner. It is a key tool, and should be used alongside the housing land audit to help planning authorities manage the land supply.

**125.** Planning authorities, developers, service providers and other partners in housing provision should work together to ensure a continuing supply of effective land and to deliver housing, taking a flexible and realistic approach. Where a shortfall in the 5-year effective housing land supply emerges, development plan policies for the supply of housing land will not be considered up-to-date, and paragraphs 32-35 will be relevant.

## Affordable Housing

**126.** Affordable housing is defined broadly as housing of a reasonable quality that is affordable to people on modest incomes. Affordable housing may be provided in the form of social rented accommodation, mid-market rented accommodation, shared ownership housing, shared equity housing, housing sold at a discount (including plots for self-build), and low cost housing without subsidy.

**127.** Where the housing supply target requires provision for affordable housing, strategic development plans should state how much of the total housing land requirement this represents.

**128.** Local development plans should clearly set out the scale and distribution of the affordable housing requirement for their area. Where the HNDA and local housing strategy process identify a shortage of affordable housing, the plan should set out the role that planning will take in addressing this. Planning authorities should consider whether it is appropriate to allocate some small sites specifically for affordable housing. Advice on the range of possible options for provision of affordable housing is set out in PAN 2/2010.

**129.** Plans should identify any expected developer contributions towards delivery of affordable housing. Where a contribution is required, this should generally be for a specified proportion of the serviced land within a development site to be made available for affordable housing. Planning authorities should consider the level of affordable housing contribution which is likely to be deliverable in the current economic climate, as part of a viable housing development. The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. Consideration should also be given to the nature of the affordable housing required and the extent to which this can be met by proposals capable of development with little or no public subsidy. Where permission is sought for specialist housing, as described in paragraphs 132-134, a contribution to affordable housing may not always be required.

<sup>52</sup> Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits sets out more fully the measure of effective sites [www.scotland.gov.uk/Publications/2010/08/31111624/5](http://www.scotland.gov.uk/Publications/2010/08/31111624/5)

**130.** Plans should consider how affordable housing requirements will be met over the period of the plan. Planning and housing officials should work together closely to ensure that the phasing of land allocations and the operation of affordable housing policies combine to deliver housing across the range of tenures. In rural areas, where significant unmet local need for affordable housing has been shown, it may be appropriate to introduce a 'rural exceptions' policy which allows planning permission to be granted for affordable housing on small sites that would not normally be used for housing, for example because they lie outwith the adjacent built-up area and are subject to policies of restraint.

**131.** Any detailed policies on how the affordable housing requirement is expected to be delivered, including any differences in approach for urban and rural areas, should be set out in supplementary guidance. Where it is considered that housing built to meet an identified need for affordable housing should remain available to meet such needs in perpetuity, supplementary guidance should set out the measures to achieve this. Any specific requirements on design may also be addressed in supplementary guidance.

## Specialist Housing Provision and Other Specific Needs

**132.** As part of the HNDA, local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for elderly people and those with a disability. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites.

**133.** HNDAs will also evidence need for sites for Gypsy/Travellers and Travelling Showpeople. Development plans and local housing strategies should address any need identified, taking into account their mobile lifestyles. In city regions, the strategic development plan should have a role in addressing cross-boundary considerations. If there is a need, local development plans should identify suitable sites for these communities. They should also consider whether policies are required for small privately-owned sites for Gypsy/Travellers, and for handling applications for permanent sites for Travelling Showpeople (where account should be taken of the need for storage and maintenance of equipment as well as accommodation). These communities should be appropriately involved in identifying sites for their use.

**134.** Local development plans should address any need for houses in multiple occupation (HMO). More information is provided in Circular 2/2012 Houses in Multiple Occupation<sup>53</sup>. Planning authorities should also consider the housing requirements of service personnel and sites for people seeking self-build plots. Where authorities believe it appropriate to allocate suitable sites for self-build plots, the sites may contribute to meeting the housing land requirement.

<sup>53</sup> [www.scotland.gov.uk/Publications/2012/06/4191](http://www.scotland.gov.uk/Publications/2012/06/4191)

# Valuing the Historic Environment

## NPF and wider policy context

**135.** NPF3 recognises the contribution made by our cultural heritage to our economy, cultural identity and quality of life. Planning has an important role to play in maintaining and enhancing the distinctive and high-quality, irreplaceable historic places which enrich our lives, contribute to our sense of identity and are an important resource for our tourism and leisure industry.

**136.** The [historic environment](#) is a key cultural and economic asset and a source of inspiration that should be seen as integral to creating successful places. Culture-led regeneration can have a profound impact on the well-being of a community in terms of the physical look and feel of a place and can also attract visitors, which in turn can bolster the local economy and sense of pride or ownership.

## Policy Principles

**137.** The planning system should:

- promote the care and protection of the designated and non-designated historic environment (including individual assets, related [settings](#) and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning; and
- enable positive change in the historic environment which is informed by a clear understanding of the importance of the heritage assets affected and ensure their future use. Change should be sensitively managed to avoid or minimise adverse impacts on the fabric and setting of the asset, and ensure that its special characteristics are protected, conserved or enhanced.

## Key Documents

- [Scottish Historic Environment Policy](#)<sup>54</sup>
- [Historic Environment Strategy for Scotland](#)<sup>55</sup>
- [Managing Change in the Historic Environment – Historic Scotland’s guidance note series](#)<sup>56</sup>
- [Planning Advice Note 2/2011: Planning and Archaeology](#)<sup>57</sup>
- [Planning Advice Note 71: Conservation Area Management](#)<sup>58</sup>
- [Scottish Historic Environment Databases](#)<sup>59</sup>

54 [www.historic-scotland.gov.uk/index/heritage/policy/shep.htm](http://www.historic-scotland.gov.uk/index/heritage/policy/shep.htm)

55 [www.scotland.gov.uk/Publications/2014/03/8522](http://www.scotland.gov.uk/Publications/2014/03/8522)

56 [www.historic-scotland.gov.uk/managingchange](http://www.historic-scotland.gov.uk/managingchange)

57 [www.scotland.gov.uk/Publications/2011/08/04132003/0](http://www.scotland.gov.uk/Publications/2011/08/04132003/0)

58 [www.scotland.gov.uk/Publications/2004/12/20450/49052](http://www.scotland.gov.uk/Publications/2004/12/20450/49052)

59 <http://smrforum-scotland.org.uk/wp-content/uploads/2014/03/SHED-Strategy-Final-April-2014.pdf>



## Delivery

### Development Planning

**138.** Strategic development plans should protect and promote their significant historic environment assets. They should take account of the capacity of settlements and surrounding areas to accommodate development without damage to their historic significance.

**139.** Local development plans and supplementary guidance should provide a framework for protecting and, where appropriate, enhancing all elements of the historic environment. Local planning authorities should designate and review existing and potential conservation areas and identify existing and proposed [Article 4 Directions](#). This should be supported by Conservation Area Appraisals and Management Plans.

### Development Management

**140.** The siting and design of development should take account of all aspects of the historic environment. In support of this, planning authorities should have access to a Sites and Monuments Record (SMR) and/or a Historic Environment Record (HER) that contains necessary information about known historic environment features and finds in their area.

### Listed Buildings

**141.** Change to a listed building should be managed to protect its special interest while enabling it to remain in active use. Where planning permission and listed building consent are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the character and appearance of the building and setting. Listed buildings should be protected from demolition or other work that would adversely affect it or its setting.

**142.** Enabling development may be acceptable where it can be clearly shown to be the only means of preventing the loss of the asset and securing its long-term future. Any development should be the minimum necessary to achieve these aims. The resultant development should be designed and sited carefully to preserve or enhance the character and setting of the historic asset.

### Conservation Areas

**143.** Proposals for development within conservation areas and proposals outwith which will impact on its appearance, character or setting, should preserve or enhance the character and appearance of the conservation area. Proposals that do not harm the character or appearance of the conservation area should be treated as preserving its character or appearance. Where the demolition of an unlisted building is proposed through Conservation Area Consent, consideration should be given to the contribution the building makes to the character and appearance of the conservation area. Where a building makes a positive contribution the presumption should be to retain it.

**144.** Proposed works to trees in conservation areas require prior notice to the planning authority and statutory Tree Preservation Orders<sup>60</sup> can increase the protection given to such trees. Conservation Area Appraisals should inform development management decisions.

<sup>60</sup> [www.scotland.gov.uk/Publications/2011/01/28152314/0](http://www.scotland.gov.uk/Publications/2011/01/28152314/0)

## Scheduled Monuments

**145.** Where there is potential for a proposed development to have an adverse effect on a [scheduled monument](#) or on the integrity of its setting, permission should only be granted where there are exceptional circumstances. Where a proposal would have a direct impact on a scheduled monument, the written consent of Scottish Ministers via a separate process is required in addition to any other consents required for the development.

## Historic Marine Protected Areas

**146.** Where planning control extends offshore, planning authorities should ensure that development will not significantly hinder the preservation objectives of [Historic Marine Protected Areas](#).

## World Heritage Sites

**147.** World Heritage Sites are of international importance. Where a development proposal has the potential to affect a World Heritage Site, or its setting, the planning authority must protect and preserve its [Outstanding Universal Value](#).

## Gardens and Designed Landscapes

**148.** Planning authorities should protect and, where appropriate, seek to enhance gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes and designed landscapes of regional and local importance.

## Battlefields

**149.** Planning authorities should seek to protect, conserve and, where appropriate, enhance the key landscape characteristics and special qualities of sites in the Inventory of Historic Battlefields.

## Archaeology and Other Historic Environment Assets

**150.** Planning authorities should protect archaeological sites and monuments as an important, finite and non-renewable resource and preserve them in situ wherever possible. Where in situ preservation is not possible, planning authorities should, through the use of conditions or a legal obligation, ensure that developers undertake appropriate excavation, recording, analysis, publication and archiving before and/or during development. If archaeological discoveries are made, they should be reported to the planning authority to enable discussion on appropriate measures, such as inspection and recording.

**151.** There is also a range of non-designated historic assets and areas of historical interest, including historic landscapes, other gardens and designed landscapes, woodlands and routes such as drove roads which do not have statutory protection. These resources are, however, an important part of Scotland's heritage and planning authorities should protect and preserve significant resources as far as possible, in situ wherever feasible.

# A Low Carbon Place

## Delivering Heat and Electricity

### NPF Context

**152.** NPF3 is clear that planning must facilitate the transition to a low carbon economy, and help to deliver the aims of the [Scottish Government's Report on Proposals and Policies](#)<sup>61</sup>. Our spatial strategy facilitates the development of generation technologies that will help to reduce greenhouse gas emissions from the energy sector. Scotland has significant renewable energy resources, both onshore and offshore. Spatial priorities range from extending heat networks in our cities and towns to realising the potential for renewable energy generation in our coastal and island areas.

**153.** Terrestrial and marine planning facilitate development of renewable energy technologies, link generation with consumers and guide new infrastructure to appropriate locations. Efficient supply of low carbon and low cost heat and generation of heat and electricity from renewable energy sources are vital to reducing greenhouse gas emissions and can create significant opportunities for communities. Renewable energy also presents a significant opportunity for associated development, investment and growth of the supply chain, particularly for ports and harbours identified in the [National Renewables Infrastructure Plan](#)<sup>62</sup>. Communities can also gain new opportunities from increased local ownership and associated benefits.

### Policy Principles

**154.** The planning system should:

- support the transformational change to a low carbon economy, consistent with national objectives and targets<sup>63</sup>, including deriving:
  - 30% of overall energy demand from renewable sources by 2020;
  - 11% of heat demand from renewable sources by 2020; and
  - the equivalent of 100% of electricity demand from renewable sources by 2020;
- support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity – and the development of heat networks;
- guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed;
- help to reduce emissions and energy use in new buildings and from new infrastructure by enabling development at appropriate locations that contributes to:
  - Energy efficiency;
  - Heat recovery;
  - Efficient energy supply and storage;

61 [www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/lowcarbon/meetingthetargets](http://www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/lowcarbon/meetingthetargets)

62 [www.scottish-enterprise.com/~media/SE/Resources/Documents/Sectors/Energy/energy-renewables-reports/National-renewables-infrastructure-plan.ashx](http://www.scottish-enterprise.com/~media/SE/Resources/Documents/Sectors/Energy/energy-renewables-reports/National-renewables-infrastructure-plan.ashx)

63 Further targets may be set in due course, for example district heating targets have been proposed.

- Electricity and heat from renewable sources; and
- Electricity and heat from non-renewable sources where greenhouse gas emissions can be significantly reduced.

## Key Documents

- [Electricity Generation Policy Statement](#)<sup>64</sup>
- [2020 Routemap for Renewable Energy in Scotland](#)<sup>65</sup>
- [Towards Decarbonising Heat: Maximising the opportunities for Scotland, Draft Heat Generation Policy Statement](#)<sup>66</sup>
- [Low Carbon Scotland: Meeting Our Emissions Reductions Targets 2013 - 2027](#)<sup>67</sup>

## Delivery

### Development Planning

**155.** Development plans should seek to ensure an area's full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and **cumulative impact** considerations.

**156.** Strategic development plans should support national priorities for the construction or improvement of strategic energy infrastructure, including generation, storage, transmission and distribution networks. They should address cross-boundary issues, promoting an approach to electricity and heat that supports the transition to a low carbon economy.

**157.** Local development plans should support new build developments, infrastructure or retrofit projects which deliver energy efficiency and the recovery of energy that would otherwise be wasted both in the specific development and surrounding area. They should set out the factors to be taken into account in considering proposals for energy developments. These will depend on the scale of the proposal and its relationship to the surrounding area and are likely to include the considerations set out at paragraph 169.

### Heat

**158.** Local development plans should use heat mapping to identify the potential for co-locating developments with a high heat demand with sources of heat supply. Heat supply sources include harvestable woodlands, sawmills producing biomass, biogas production sites and developments producing unused excess heat, as well as geothermal systems, heat recoverable from mine waters, aquifers, other bodies of water and heat storage systems. Heat demand sites for particular consideration include high density developments, communities off the gas grid, fuel poor areas and **anchor developments** such as hospitals, schools, leisure centres and heat intensive industry.

**159.** Local development plans should support the development of heat networks in as many locations as possible, even where they are initially reliant on carbon-based fuels if there is potential to convert them to run on renewable or low carbon sources of heat in the future. Local development plans should identify where heat networks, heat storage and **energy centres** exist or would be appropriate and include policies to support their implementation. Policies should support

64 [www.scotland.gov.uk/Topics/Business-Industry/Energy/EGPSMain](http://www.scotland.gov.uk/Topics/Business-Industry/Energy/EGPSMain)

65 [www.scotland.gov.uk/Publications/2011/08/04110353/0](http://www.scotland.gov.uk/Publications/2011/08/04110353/0)

66 [www.scotland.gov.uk/Publications/2014/03/2778](http://www.scotland.gov.uk/Publications/2014/03/2778)

67 [www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/lowcarbon/meetingthetargets](http://www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/lowcarbon/meetingthetargets)



safeguarding of piperuns within developments for later connection and pipework to the curtilage of development. Policies should also give consideration to the provision of energy centres within new development. Where a district network exists, or is planned, or in areas identified as appropriate for district heating, policies may include a requirement for new development to include infrastructure for connection, providing the option to use heat from the network.

**160.** Where heat networks are not viable, microgeneration and heat recovery technologies associated with individual properties should be encouraged.

## Onshore Wind

**161.** Planning authorities should set out in the development plan a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms as a guide for developers and communities, following the approach set out below in Table 1. Development plans should indicate the minimum scale<sup>68</sup> of onshore wind development that their spatial framework is intended to apply to. Development plans should also set out the criteria that will be considered in deciding all applications for wind farms of different scales – including extensions and re-powering – taking account of the considerations set out at paragraph 169.

**162.** Both strategic and local development planning authorities, working together where required, should identify where there is strategic capacity for wind farms, and areas with the greatest potential for wind development, considering cross-boundary constraints and opportunities. Strategic development planning authorities are expected to take the lead in dealing with cross-boundary constraints and opportunities and will coordinate activity with constituent planning authorities.

**163.** The approach to spatial framework preparation set out in the SPP should be followed in order to deliver consistency nationally and additional constraints should not be applied at this stage. The spatial framework is complemented by a more detailed and exacting development management process where the merits of an individual proposal will be carefully considered against the full range of environmental, community, and [cumulative impacts](#) (see paragraph 169).

**164.** Individual properties and those settlements not identified within the development plan will be protected by the safeguards set out in the local development plan policy criteria for determining wind farms and the development management considerations accounted for when determining individual applications.

**165.** Grid capacity should not be used as a reason to constrain the areas identified for wind farm development or decisions on individual applications for wind farms. It is for wind farm developers to discuss connections to the grid with the relevant transmission network operator. Consideration should be given to underground grid connections where possible.

**166.** Proposals for onshore wind turbine developments should continue to be determined while spatial frameworks and local policies are being prepared and updated. Moratoria on onshore wind development are not appropriate.

<sup>68</sup> For example, Loch Lomond and The Trossachs and Cairngorms National Parks refer to developments of more than one turbine and over 30 metres in height as large-scale commercial wind turbines.

# Table 1: Spatial Frameworks

<p><b>Group 1: Areas where wind farms will not be acceptable:</b></p> <p>National Parks and National Scenic Areas.</p>		
<p><b>Group 2: Areas of significant protection:</b></p> <p>Recognising the need for significant protection, in these areas wind farms may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.</p>		
<p><b>National and international designations:</b></p> <ul style="list-style-type: none"> <li>• World Heritage Sites;</li> <li>• Natura 2000 and Ramsar sites;</li> <li>• Sites of Special Scientific Interest;</li> <li>• National Nature Reserves;</li> <li>• Sites identified in the Inventory of Gardens and Designed Landscapes;</li> <li>• Sites identified in the Inventory of Historic Battlefields.</li> </ul>	<p><b>Other nationally important mapped environmental interests:</b></p> <ul style="list-style-type: none"> <li>• areas of wild land as shown on the 2014 SNH map of wild land areas;</li> <li>• carbon rich soils, deep peat and priority peatland habitat.</li> </ul>	<p><b>Community separation for consideration of visual impact:</b></p> <ul style="list-style-type: none"> <li>• an area not exceeding 2km around cities, towns and villages identified on the local development plan with an identified settlement envelope or edge. The extent of the area will be determined by the planning authority based on landform and other features which restrict views out from the settlement.</li> </ul>
<p><b>Group 3: Areas with potential for wind farm development:</b></p> <p>Beyond groups 1 and 2, wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria.</p>		

## Other Renewable Electricity Generating Technologies and Storage

**167.** Development plans should identify areas capable of accommodating renewable electricity projects in addition to wind generation, including hydro-electricity generation related to river or tidal flows or energy storage projects of a range of scales.

**168.** Development plans should identify areas which are weakly connected or unconnected to the national electricity network and facilitate development of decentralised and mobile energy storage installations. Energy storage schemes help to support development of renewable energy and maintain stability of the electricity network in areas where reinforcement is needed to manage congestion. Strategic development planning authorities are expected to take the lead in dealing with cross-boundary constraints and opportunities and will coordinate activity between constituent planning authorities.

## Development Management

**169.** Proposals for energy infrastructure developments should always take account of spatial frameworks for wind farms and heat maps where these are relevant. Considerations will vary relative to the scale of the proposal and area characteristics but are likely to include:

- net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities;
- the scale of contribution to renewable energy generation targets;
- effect on greenhouse gas emissions;
- **cumulative impacts** – planning authorities should be clear about likely cumulative impacts arising from all of the considerations below, recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development;
- impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;
- landscape and visual impacts, including effects on wild land;
- effects on the natural heritage, including birds;
- impacts on carbon rich soils, using the carbon calculator;
- public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF;
- impacts on the historic environment, including scheduled monuments, listed buildings and their settings;
- impacts on tourism and recreation;
- impacts on aviation and defence interests and seismological recording;
- impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;
- impacts on road traffic;
- impacts on adjacent trunk roads;
- effects on hydrology, the water environment and flood risk;
- the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration;

- opportunities for energy storage; and
- the need for a robust planning obligation to ensure that operators achieve site restoration.

**170.** Areas identified for wind farms should be suitable for use in perpetuity. Consents may be time-limited but wind farms should nevertheless be sited and designed to ensure impacts are minimised and to protect an acceptable level of amenity for adjacent communities.

**171.** Proposals for energy generation from non-renewable sources may be acceptable where carbon capture and storage or other emissions reduction infrastructure is either already in place or committed within the development's lifetime and proposals must ensure protection of good environmental standards.

**172.** Where new energy generation or storage proposals are being considered, the potential to connect those projects to off-grid areas should be considered.

### Community Benefit

**173.** Where a proposal is acceptable in land use terms, and consent is being granted, local authorities may wish to engage in negotiations to secure community benefit in line with the [Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments](#)<sup>69</sup>.

### Existing Wind Farm Sites

**174.** Proposals to repower existing wind farms which are already in suitable sites where environmental and other impacts have been shown to be capable of mitigation can help to maintain or enhance installed capacity, underpinning renewable energy generation targets. The current use of the site as a wind farm will be a material consideration in any such proposals.

## Planning for Zero Waste

### NPF and Wider Context

**175.** NPF3 recognises that waste is a resource and an opportunity, rather than a burden. Scotland has a Zero Waste Policy, which means wasting as little as possible and recognising that every item and material we use, either natural or manufactured, is a resource which has value for our economy. Planning plays a vital role in supporting the provision of facilities and infrastructure for future business development, investment and employment.

### Policy Principles

**176.** The planning system should:

- promote developments that minimise the unnecessary use of primary materials and promote efficient use of secondary materials;
- support the emergence of a diverse range of new technologies and investment opportunities to secure economic value from secondary resources, including reuse, refurbishment, remanufacturing and reprocessing;
- support achievement of Scotland's zero waste targets: recycling 70% of household waste and sending no more than 5% of Scotland's annual waste arisings to landfill by 2025; and
- help deliver infrastructure at appropriate locations, prioritising development in line with the waste hierarchy: waste prevention, reuse, recycling, energy recovery and waste disposal.

69 [www.scotland.gov.uk/Publications/2013/11/8279](http://www.scotland.gov.uk/Publications/2013/11/8279)



## Key Documents

- [EU revised Waste Framework Directive](#)<sup>70</sup> (2008/98/EC)
- [Waste \(Scotland\) Regulations 2012](#)<sup>71</sup>: a statutory framework to maximise the quantity and quality of materials available for recycling and minimise the need for residual waste infrastructure;
- [Zero Waste Plan](#)<sup>72</sup> and accompanying regulations and supporting documents;
- Safeguarding Scotland's Resources: A blueprint for a more resource efficient and circular economy;
- [Circular 6/2013 Development Planning](#)<sup>73</sup>;
- SEPA waste data sources: including [Waste Data Digests](#)<sup>74</sup> and [Waste Infrastructure Maps](#)<sup>75</sup>;
- [SEPA Thermal Treatment of Waste Guidelines 2013](#)<sup>76</sup>;
- [Waste capacity tables](#)<sup>77</sup> (formerly Zero Waste Plan Annex B capacity tables)

## Delivery

**177.** Planning authorities and SEPA should work collaboratively to achieve zero waste objectives, having regard to the Zero Waste Plan, through development plans and development management. A revised version of PAN 63: Planning and Waste Management will be published in due course.

## Development Planning

**178.** Plans should give effect to the aims of the Zero Waste Plan and promote the waste hierarchy.

**179.** For new developments, including industrial, commercial, and residential, plans should promote resource efficiency and the minimisation of waste during construction and operation.

**180.** Plans should enable investment opportunities in a range of technologies and industries to maximise the value of secondary resources and waste to the economy, including composting facilities, transfer stations, materials recycling facilities, anaerobic digestion, mechanical, biological and thermal treatment plants. In line with the waste hierarchy, particular attention should be given to encouraging opportunities for reuse, refurbishment, remanufacturing and reprocessing of high value materials and products. Industry and business should engage with planning authorities to help identify sites which would enable co-location with end users of outputs where appropriate.

**181.** Planning authorities should have regard to the annual update of required capacity for source segregated and unsorted waste, mindful of the need to achieve the all-Scotland operational capacity. However, this should not be regarded as a cap and planning authorities should generally facilitate growth in sustainable resource management.

<sup>70</sup> <http://ec.europa.eu/environment/waste/framework/revision.htm>

<sup>71</sup> [www.legislation.gov.uk/sdsi/2012/9780111016657/contents](http://www.legislation.gov.uk/sdsi/2012/9780111016657/contents)

<sup>72</sup> [www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/wastestrategy](http://www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/wastestrategy)

<sup>73</sup> [www.scotland.gov.uk/Publications/2013/12/9924/0](http://www.scotland.gov.uk/Publications/2013/12/9924/0)

<sup>74</sup> [www.sepa.org.uk/waste/waste\\_data/waste\\_data\\_digest.aspx](http://www.sepa.org.uk/waste/waste_data/waste_data_digest.aspx)

<sup>75</sup> [www.sepa.org.uk/waste/waste\\_infrastructure\\_maps.aspx](http://www.sepa.org.uk/waste/waste_infrastructure_maps.aspx)

<sup>76</sup> [www.sepa.org.uk/waste/waste\\_regulation/energy\\_from\\_waste.aspx](http://www.sepa.org.uk/waste/waste_regulation/energy_from_waste.aspx)

<sup>77</sup> [www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/wastestrategy/annexb](http://www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/wastestrategy/annexb)

**182.** The planning system should support the provision of a network of infrastructure to allow Scotland's waste and secondary resources to be managed in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to protect the environment and public health. While a significant shortfall of waste management infrastructure exists, emphasis should be placed on need over proximity. The achievement of a sustainable strategy may involve waste crossing planning boundaries. However, as the national network of installations becomes more fully developed, there will be scope for giving greater weight to proximity in identifying suitable locations for new waste facilities.

**183.** Any sites identified specifically for energy from waste facilities should enable links to be made to potential users of renewable heat and energy. Such schemes are particularly suitable in locations where there are premises nearby with a long-term demand for heat. Paragraphs 158 to 160 set out policy on heat networks and mapping.

**184.** Plans should safeguard existing waste management installations and ensure that the allocation of land on adjacent sites does not compromise waste handling operations, which may operate 24 hours a day and partly outside buildings.

**185.** Strategic development plans and local development plans outwith city regions should set out spatial strategies which make provision for new infrastructure, indicating clearly that it can generally be accommodated on land designated for employment, industrial or storage and distribution uses.

**186.** Local development plans should identify appropriate locations for new infrastructure, allocating specific sites where possible, and should provide a policy framework which facilitates delivery. Suitable sites will include those which have been identified for employment, industry or storage and distribution. Updated Scottish Government planning advice on identifying sites and assessing their suitability will be provided in due course.

**187.** Local development plans should identify where masterplans or development briefs will be required to guide the development of waste installations for major sites.

## **Development Management**

**188.** In determining applications for new installations, authorities should take full account of the policy set out at paragraph 176. Planning authorities should determine whether proposed developments would constitute appropriate uses of the land, leaving the regulation of permitted installations to SEPA.

**189.** SEPA's Thermal Treatment of Waste Guidelines 2013 and addendum sets out policy on thermal treatment plants.

**190.** All new development including residential, commercial and industrial properties should include provision for waste separation and collection to meet the requirements of the Waste (Scotland) Regulations.

**191.** Planning authorities should consider the need for buffer zones between dwellings or other **sensitive receptors** and some waste management facilities. As a guide, appropriate buffer distances may be:

- 100m between sensitive receptors and recycling facilities, small-scale thermal treatment or leachate treatment plant;
- 250m between sensitive receptors and operations such as outdoor composting, anaerobic digestion, mixed waste processing, thermal treatment or landfill gas plant; and
- greater between sensitive receptors and landfill sites.

**192.** Planning authorities should:

- consider requiring the preparation of site waste management plans for construction sites;
- secure decommissioning or restoration (including landfill) to agreed standards as a condition of planning permission for waste management facilities; and
- ensure that landfill consents are subject to an appropriate financial bond unless the operator can demonstrate that their programme of restoration, including the necessary financing, phasing and aftercare of sites, is sufficient.

# A Natural, Resilient Place

## Valuing the Natural Environment

### NPF Context

**193.** The natural environment forms the foundation of the spatial strategy set out in NPF3. The environment is a valued national asset offering a wide range of opportunities for enjoyment, recreation and sustainable economic activity. Planning plays an important role in protecting, enhancing and promoting access to our key environmental resources, whilst supporting their sustainable use.

### Policy Principles

**194.** The planning system should:

- facilitate positive change while maintaining and enhancing distinctive landscape character;
- conserve and enhance protected sites and species, taking account of the need to maintain healthy ecosystems and work with the natural processes which provide important services to communities;
- promote protection and improvement of the water environment, including rivers, lochs, estuaries, wetlands, coastal waters and groundwater, in a sustainable and co-ordinated way;
- seek to protect soils from damage such as erosion or compaction;
- protect and enhance ancient semi-natural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value;
- seek benefits for **biodiversity** from new development where possible, including the restoration of degraded habitats and the avoidance of further fragmentation or isolation of habitats; and
- support opportunities for enjoying and learning about the natural environment.

### Key Documents

- [Getting the Best from Our Land – A Land Use Strategy for Scotland](#)<sup>78</sup>
- [The 2020 Challenge for Scotland's Biodiversity](#)<sup>79</sup>
- [European Landscape Convention](#)<sup>80</sup>
- [Nature Conservation \(Scotland\) Act 2004](#)<sup>81</sup>
- [The Conservation \(Natural Habitats etc\) Regulations](#)<sup>82</sup>
- [The Wildlife and Countryside Act 1981](#)<sup>83</sup>

<sup>78</sup> [www.scotland.gov.uk/Topics/Environment/Countryside/Landusestrategy](http://www.scotland.gov.uk/Topics/Environment/Countryside/Landusestrategy)

<sup>79</sup> [www.scotland.gov.uk/Publications/2013/06/5538](http://www.scotland.gov.uk/Publications/2013/06/5538)

<sup>80</sup> [www.coe.int/t/dg4/cultureheritage/heritage/landscape/default\\_en.asp](http://www.coe.int/t/dg4/cultureheritage/heritage/landscape/default_en.asp)

<sup>81</sup> [www.legislation.gov.uk/asp/2004/6/contents](http://www.legislation.gov.uk/asp/2004/6/contents)

<sup>82</sup> [www.legislation.gov.uk/uksi/1994/2716/contents/made](http://www.legislation.gov.uk/uksi/1994/2716/contents/made)

<sup>83</sup> [www.legislation.gov.uk/ukpga/1981/69](http://www.legislation.gov.uk/ukpga/1981/69)



- [EU Birds Directive – 2009/147/EC](#)<sup>84</sup>
- [EU Habitats Directive – 92/43/EEC](#)<sup>85</sup>
- [Ramsar Convention on Wetlands of International Importance](#)<sup>86</sup>
- [National Parks \(Scotland\) Act 2000](#)<sup>87</sup>
- [River Basin Management Plans](#)<sup>88</sup>

## Delivery

**195.** Planning authorities, and all public bodies, have a duty under the Nature Conservation (Scotland) Act 2004 to further the conservation of **biodiversity**. This duty must be reflected in development plans and development management decisions. They also have a duty under the Water Environment and Water Services (Scotland) Act 2003 to protect and improve Scotland's water environment. The Scottish Government expects public bodies to apply the Principles for Sustainable Land Use, as set out in the Land Use Strategy, when taking significant decisions affecting the use of land.

## Development Plans

**196.** International, national and locally designated areas and sites should be identified and afforded the appropriate level of protection in development plans. Reasons for local designation should be clearly explained and their function and continuing relevance considered when preparing plans. Buffer zones should not be established around areas designated for their natural heritage importance. Plans should set out the factors which will be taken into account in development management. The level of protection given to local designations should not be as high as that given to international or national designations.

**197.** Planning authorities are encouraged to limit non-statutory local designations to areas designated for their local landscape or nature conservation value:

- the purpose of areas of local landscape value should be to:
  - safeguard and enhance the character and quality of a landscape which is important or particularly valued locally or regionally; or
  - promote understanding and awareness of the distinctive character and special qualities of local landscapes; or
  - safeguard and promote important local settings for outdoor recreation and tourism.
- local nature conservation sites should seek to accommodate the following factors:
  - species diversity, species or habitat rarity, naturalness and extent of habitat;
  - contribution to national and local **biodiversity** objectives;
  - potential contribution to the protection or enhancement of connectivity between habitats or the development of **green networks**; and
  - potential to facilitate enjoyment and understanding of natural heritage.

<sup>84</sup> [ec.europa.eu/environment/nature/legislation/birdsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm)

<sup>85</sup> [ec.europa.eu/environment/nature/legislation/habitatsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm)

<sup>86</sup> [www.ramsar.org/cda/en/ramsar-home/main/ramsar/1\\_4000\\_0](http://www.ramsar.org/cda/en/ramsar-home/main/ramsar/1_4000_0)

<sup>87</sup> [www.legislation.gov.uk/asp/2000/10/contents](http://www.legislation.gov.uk/asp/2000/10/contents)

<sup>88</sup> [www.sepa.org.uk/water/river\\_basin\\_planning.aspx](http://www.sepa.org.uk/water/river_basin_planning.aspx)

**198.** Local nature conservation sites designated for their geodiversity should be selected for their value for scientific study and education, their historical significance and cultural and aesthetic value, and for their potential to promote public awareness and enjoyment.

**199.** Plans should address the potential effects of development on the natural environment, including proposals for [major-accident hazard sites](#) and the cumulative effects of incremental changes. They should consider the natural and cultural components together, and promote opportunities for the enhancement of degraded landscapes, particularly where this helps to restore or strengthen the natural processes which underpin the well-being and resilience of communities.

**200.** Wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas.

**201.** Plans should identify woodlands of high nature conservation value and include policies for protecting them and enhancing their condition and resilience to climate change. Forestry Commission Scotland's [Native Woodland Survey of Scotland](#)<sup>89</sup> provides information and guidance. Planning authorities should consider preparing forestry and woodland strategies as supplementary guidance to inform the development of forestry and woodland in their area, including the expansion of woodland of a range of types to provide multiple benefits. Scottish Government advice on planning for forestry and woodlands is set out in [The Right Tree in the Right Place](#)<sup>90</sup>.

## Development Management

**202.** The siting and design of development should take account of local landscape character. Development management decisions should take account of potential effects on landscapes and the natural and water environment, including cumulative effects. Developers should seek to minimise adverse impacts through careful planning and design, considering the services that the natural environment is providing and maximising the potential for enhancement.

**203.** Planning permission should be refused where the nature or scale of proposed development would have an unacceptable impact on the natural environment. Direct or indirect effects on statutorily protected sites will be an important consideration, but designation does not impose an automatic prohibition on development.

**204.** Planning authorities should apply the precautionary principle where the impacts of a proposed development on nationally or internationally significant landscape or natural heritage resources are uncertain but there is sound evidence indicating that significant irreversible damage could occur. The precautionary principle should not be used to impede development without justification. If there is any likelihood that significant irreversible damage could occur, modifications to the proposal to eliminate the risk of such damage should be considered. If there is uncertainty, the potential for research, surveys or assessments to remove or reduce uncertainty should be considered.

**205.** Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO<sub>2</sub>) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO<sub>2</sub> to the atmosphere. Developments should aim to minimise this release.

89 [www.forestry.gov.uk/nwss](http://www.forestry.gov.uk/nwss)

90 [www.forestry.gov.uk/pdf/fcfc129.pdf/\\$file/fcfc129.pdf](http://www.forestry.gov.uk/pdf/fcfc129.pdf/$file/fcfc129.pdf)

**206.** Where non-native species are present on site, or where planting is planned as part of a development, developers should take into account the provisions of the Wildlife and Countryside Act 1981 relating to non-native species.

## International Designations

### Natura 2000 Sites

**207.** Sites designated as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) make up the Natura 2000 network of protected areas. Any development plan or proposal likely to have a significant effect on these sites which is not directly connected with or necessary to their conservation management must be subject to an “appropriate assessment” of the implications for the conservation objectives. Such plans or proposals may only be approved if the competent authority has ascertained by means of an “appropriate assessment” that there will be no adverse effect on the integrity of the site.

**208.** A derogation is available for authorities to approve plans or projects which could adversely affect the integrity of a Natura site if:

- there are no alternative solutions;
- there are imperative reasons of overriding public interest, including those of a social or economic nature; and
- compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

**209.** If an authority wishes to use this derogation, Scottish Ministers must be notified. For sites hosting a priority habitat or species (as defined in Article 1 of the Habitats Directive), prior consultation with the European Commission via Scottish Ministers is required unless either the proposal is necessary for public health or safety reasons or it will have beneficial consequences of primary importance to the environment.

**210.** Authorities should afford the same level of protection to proposed SACs and SPAs (i.e. sites which have been approved by Scottish Ministers for formal consultation but which have not yet been designated) as they do to sites which have been designated.

### Ramsar Sites

**211.** All [Ramsar sites](#) are also Natura 2000 sites and/or Sites of Special Scientific Interest and are protected under the relevant statutory regimes.

## National Designations

**212.** Development that affects a National Park, [National Scenic Area](#), [Site of Special Scientific Interest](#) or a [National Nature Reserve](#) should only be permitted where:

- the objectives of designation and the overall integrity of the area will not be compromised; or
- any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

**213.** Planning decisions for development within National Parks must be consistent with paragraphs 84-85.

## Protected Species

**214.** The presence (or potential presence) of a legally protected species is an important consideration in decisions on planning applications. If there is evidence to suggest that a protected species is present on site or may be affected by a proposed development, steps must be taken to establish their presence. The level of protection afforded by legislation must be factored into the planning and design of the development and any impacts must be fully considered prior to the determination of the application. Certain activities – for example those involving European Protected Species as specified in the Conservation (Natural Habitats, &c.) Regulations 1994 and wild birds, protected animals and plants under the Wildlife and Countryside Act 1981 – may only be undertaken under licence. Following the introduction of the Wildlife and Natural Environment (Scotland) Act 2011, Scottish Natural Heritage is now responsible for the majority of wildlife licensing in Scotland.

## Areas of Wild Land

**215.** In areas of wild land (see paragraph 200), development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

## Woodland

**216.** Ancient semi-natural woodland is an irreplaceable resource and, along with other woodlands, hedgerows and individual trees, especially veteran trees of high nature conservation and landscape value, should be protected from adverse impacts resulting from development. [Tree Preservation Orders](#)<sup>91</sup> can be used to protect individual trees and groups of trees considered important for amenity or their cultural or historic interest.

**217.** Where appropriate, planning authorities should seek opportunities to create new woodland and plant native trees in association with development. If a development would result in the severing or impairment of connectivity between important woodland habitats, workable mitigation measures should be identified and implemented, preferably linked to a wider green network (see also the section on green infrastructure).

**218.** The Scottish Government's [Control of Woodland Removal Policy](#)<sup>92</sup> includes a presumption in favour of protecting woodland. Removal should only be permitted where it would achieve significant and clearly defined additional public benefits. Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting. The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the Control of Woodland Removal Policy, and this should be taken into account when preparing development plans and determining planning applications.

91 [www.scotland.gov.uk/Publications/2011/01/28152314/0](http://www.scotland.gov.uk/Publications/2011/01/28152314/0)

92 [www.forestry.gov.uk/pdf/fcfc125.pdf/%24FILE/fcfc125.pdf](http://www.forestry.gov.uk/pdf/fcfc125.pdf/%24FILE/fcfc125.pdf)



# Maximising the Benefits of Green Infrastructure

## NPF Context

**219.** NPF3 aims to significantly enhance green infrastructure networks, particularly in and around our cities and towns. [Green infrastructure](#) and improved access to [open space](#) can help to build stronger, healthier communities. It is an essential part of our long-term environmental performance and climate resilience. Improving the quality of our places and spaces through integrated green infrastructure networks can also encourage investment and development.

## Policy Principles

**220.** Planning should protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking.

**221.** The planning system should:

- consider green infrastructure as an integral element of places from the outset of the planning process;
- assess current and future needs and opportunities for green infrastructure to provide multiple benefits;
- facilitate the provision and long-term, integrated management of green infrastructure and prevent fragmentation; and
- provide for easy and safe access to and within green infrastructure, including core paths and other important routes, within the context of statutory access rights under the Land Reform (Scotland) Act 2003.

## Key Documents

- [Green Infrastructure: Design and Placemaking](#)<sup>93</sup>
- [Getting the Best from Our Land – A Land Use Strategy for Scotland](#)<sup>94</sup>
- [Planning Advice Note 65: Planning and Open Space](#)<sup>95</sup>
- [Reaching Higher – Scotland’s National Strategy for Sport](#)<sup>96</sup>
- [The Play Strategy for Scotland and Action Plan](#)<sup>97</sup>
- [Let’s Get Scotland Walking: The National Walking Strategy](#)<sup>98</sup>

## Delivery

### Development Planning

**222.** Development plans should be based on a holistic, integrated and cross-sectoral approach to green infrastructure. They should be informed by relevant, up-to-date audits, strategies and action plans covering green infrastructure’s multiple functions, for example open space, playing fields, pitches, outdoor access, core paths, active travel strategies, the historic environment, [biodiversity](#), forestry and woodland, river basins, flood management, coastal zones and the marine environment.

<sup>93</sup> [www.scotland.gov.uk/Publications/2011/11/04140525/0](http://www.scotland.gov.uk/Publications/2011/11/04140525/0)

<sup>94</sup> [www.scotland.gov.uk/Publications/2011/03/17091927/0](http://www.scotland.gov.uk/Publications/2011/03/17091927/0)

<sup>95</sup> [www.scotland.gov.uk/Publications/2008/05/30100623/0](http://www.scotland.gov.uk/Publications/2008/05/30100623/0)

<sup>96</sup> [www.scotland.gov.uk/Topics/ArtsCultureSport/Sport/NationalStrategies/Sport-21](http://www.scotland.gov.uk/Topics/ArtsCultureSport/Sport/NationalStrategies/Sport-21)

<sup>97</sup> [www.scotland.gov.uk/Publications/2013/10/9424](http://www.scotland.gov.uk/Publications/2013/10/9424)

<sup>98</sup> [www.scotland.gov.uk/Publications/2014/06/5743](http://www.scotland.gov.uk/Publications/2014/06/5743)

Plans should promote consistency with these and reflect their priorities and spatial implications.

**223.** Strategic development plans should safeguard existing strategic or regionally important assets and identify strategic priorities for green infrastructure addressing cross-boundary needs and opportunities.

**224.** Local development plans should identify and protect open space identified in the open space audit and strategy as valued and functional or capable of being brought into use to meet local needs.

**225.** Local development plans should seek to enhance existing and promote the creation of new green infrastructure, which may include retrofitting. They should do this through a design-led approach, applying standards which facilitate appropriate provision, addressing deficits or surpluses within the local context. The standards delivered through a design-led approach should result in a proposal that is appropriate to place, including connections to other green infrastructure assets. Supplementary guidance or master plans may be used to achieve this.

**226.** Local development plans should identify sites for new indoor or outdoor sports, recreation or play facilities where a need has been identified in a local facility strategy, playing field strategy or similar document. They should provide for good quality, accessible facilities in sufficient quantity to satisfy current and likely future community demand. [Outdoor sports facilities](#) should be safeguarded from development except where:

- the proposed development is ancillary to the principal use of the site as an outdoor sports facility;
- the proposed development involves only a minor part of the outdoor sports facility and would not affect its use and potential for sport and training;
- the outdoor sports facility which would be lost would be replaced either by a new facility of comparable or greater benefit for sport in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing capacity in the area; or
- the relevant strategy (see paragraph 224) and consultation with **sportscotland** show that there is a clear excess of provision to meet current and anticipated demand in the area, and that the site would be developed without detriment to the overall quality of provision.

**227.** Local development plans should safeguard existing and potential allotment sites to ensure that local authorities meet their statutory duty to provide allotments where there is proven demand. Plans should also encourage opportunities for a range of community growing spaces.

**228.** Local development plans should safeguard access rights and core paths, and encourage new and enhanced opportunities for access linked to wider networks.

**229.** Local development plans should encourage the temporary use of unused or underused land as green infrastructure while making clear that this will not prevent any future development potential which has been identified from being realised. This type of greening may provide the advance structure planting to create the landscape framework for any future development.

## Development Management

**230.** Development of land allocated as green infrastructure for an unrelated purpose should have a strong justification. This should be based on evidence from relevant audits and strategies that the proposal will not result in a deficit of that type of provision within the local area and that alternative sites have been considered. Poor maintenance and neglect should not be used as a justification for development for other purposes.

**231.** Development proposals that would result in or exacerbate a deficit of green infrastructure should include provision to remedy that deficit with accessible infrastructure of an appropriate type, quantity and quality.

**232.** In the design of green infrastructure, consideration should be given to the qualities of successful places. Green infrastructure should be treated as an integral element in how the proposal responds to local circumstances, including being well-integrated into the overall design layout and multi-functional. Arrangements for the long-term management and maintenance of green infrastructure, and associated water features, including common facilities, should be incorporated into any planning permission.

**233.** Proposals that affect regional and country parks must have regard to their statutory purpose of providing recreational access to the countryside close to centres of population, and should take account of their wider objectives as set out in their management plans and strategies.

## Promoting Responsible Extraction of Resources

### NPF Context

**234.** Minerals make an important contribution to the economy, providing materials for construction, energy supply and other uses, and supporting employment. NPF3 notes that minerals will be required as construction materials to support our ambition for diversification of the energy mix. Planning should safeguard mineral resources and facilitate their responsible use. Our spatial strategy underlines the need to address restoration of past minerals extraction sites in and around the Central Belt.

### Policy Principles

**235.** The planning system should:

- recognise the national benefit of indigenous coal, oil and gas production in maintaining a diverse energy mix and improving energy security;
- safeguard workable resources and ensure that an adequate and steady supply is available to meet the needs of the construction, energy and other sectors;
- minimise the impacts of extraction on local communities, the environment and the built and natural heritage; and
- secure the sustainable restoration of sites to beneficial afteruse after working has ceased.

## Key Documents

- [Electricity Generation Policy Statement](#)<sup>99</sup>
- [Management of Extractive Waste \(Scotland\) Regulations 2010](#)<sup>100</sup>
- [PAN 50: Controlling the Environmental Effects of Surface Mineral Workings](#)<sup>101</sup>
- [Planning Advice Note 64: Reclamation of Surface Mineral Workings](#)<sup>102</sup>
- [Circular 2/2003: Safeguarding of Aerodromes, Technical Sites and Military Explosive Storage Areas](#)<sup>103</sup>
- [Circular 34/1996: Environment Act 1995 Section 96](#)<sup>104</sup>

## Delivery

### Development Planning

**236.** Strategic development plans should ensure that adequate supplies of construction aggregates can be made available from within the plan area to meet the likely development needs of the city region over the plan period.

**237.** Local development plans should safeguard all workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development. Plans should set out the factors that specific proposals will need to address, including:

- disturbance, disruption and noise, blasting and vibration, and potential pollution of land, air and water;
- impacts on local communities, individual houses, [sensitive receptors](#) and economic sectors important to the local economy;
- benefits to the local and national economy;
- [cumulative impact](#) with other mineral and landfill sites in the area;
- effects on natural heritage, habitats and the historic environment;
- landscape and visual impacts, including cumulative effects;
- transport impacts; and
- restoration and aftercare (including any benefits in terms of the remediation of existing areas of dereliction or instability).

**238.** Plans should support the maintenance of a landbank of permitted reserves for construction aggregates of at least 10 years at all times in all market areas through the identification of areas of search. Such areas can be promoted by developers or landowners as part of the plan preparation process or by planning authorities where they wish to guide development to particular areas. As an alternative, a criteria-based approach may be taken, particularly where a sufficient landbank already exists or substantial unconstrained deposits are available.

99 [www.scotland.gov.uk/Publications/2013/06/5757](http://www.scotland.gov.uk/Publications/2013/06/5757)

100 [www.legislation.gov.uk/ssi/2010/60/contents/made](http://www.legislation.gov.uk/ssi/2010/60/contents/made)

101 [www.scotland.gov.uk/Publications/1996/10/17729/23424](http://www.scotland.gov.uk/Publications/1996/10/17729/23424)

102 [www.scotland.gov.uk/Publications/2003/01/16122/16256](http://www.scotland.gov.uk/Publications/2003/01/16122/16256)

103 [www.scotland.gov.uk/Publications/2003/01/16204/17030](http://www.scotland.gov.uk/Publications/2003/01/16204/17030)

104 [www.scotland.gov.uk/Publications/1996/11/circular-34-1996-root/circular-34-1996-guidance](http://www.scotland.gov.uk/Publications/1996/11/circular-34-1996-root/circular-34-1996-guidance)



**239.** Local development plans should identify areas of search where surface coal extraction is most likely to be acceptable during the plan period and set out the preferred programme for the development of other safeguarded areas beyond the plan period, with particular emphasis on protecting local communities from significant cumulative impacts. Where possible, plans should secure extraction prior to permanent development above workable coal reserves.

**240.** For areas covered by a Petroleum Exploration and Development Licence (PEDL), local development plans should also:

- identify licence areas;
- encourage operators to be as clear as possible about the minimum and maximum extent of operations (e.g. number of wells and duration) at the exploration phase whilst recognising that the factors to be addressed by applications should be relevant and proportionate to the appropriate exploration, appraisal and production phases of operations;
- confirm that applicants should engage with local communities, residents and other stakeholders at each stage of operations, beginning in advance of any application for planning permission and in advance of any operations;
- ensure that when developing proposals, applicants should consider, where possible, transport of the end product by pipeline, rail or water rather than road; and
- provide a consistent approach to extraction where licences extend across local authority boundaries.

**241.** Policies should protect areas of peatland and only permit commercial extraction in areas suffering historic, significant damage through human activity and where the conservation value is low and restoration is impossible.

## Development Management

**242.** Operators should provide sufficient information to enable a full assessment to be made of the likely effects of development together with appropriate control, mitigation and monitoring measures. This should include the provision of an adequate buffer zone between sites and settlements, taking account of the specific circumstances of individual proposals, including size, duration, location, method of working, topography, the characteristics of the various environmental effects likely to arise and the mitigation that can be provided.

**243.** Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries; they are time-limited; tied to a particular project and appropriate reclamation measures are in place.

**244.** Consent should only be granted for surface coal extraction proposals which are either environmentally acceptable (or can be made so by planning conditions) or provide local or community benefits which clearly outweigh the likely impacts of extraction. Site boundaries within 500 metres of the edge of settlements will only be environmentally acceptable where local circumstances, such as the removal of dereliction, small-scale prior extraction or the stabilisation of mining legacy, justify a lesser distance. Non-engineering works and mitigation measures within 500 metres may be acceptable.

**245.** To assist planning authorities with their consideration of impacts on local communities, neighbouring uses and the environment, applicants should undertake a risk assessment for all proposals for shale gas and coal bed methane extraction. The assessment can, where appropriate, be undertaken as part of any environmental impact assessment and should also be developed in consultation with statutory consultees and local communities so that it informs the design of the proposal. The assessment should clearly identify those onsite activities (i.e. emission of pollutants, the creation and disposal of waste) that pose a potential risk using a source–pathway–receptor model and explain how measures, including those under environmental and other legislation, will be used to monitor, manage and mitigate any identified risks to health, amenity and the environment. The evidence from, and outcome of, the assessment should lead to buffer zones being proposed in the application which will protect all [sensitive receptors](#) from unacceptable risks. When considering applications, planning authorities and statutory consultees must assess the distances proposed by the applicant. Where proposed distances are considered inadequate the Scottish Government expects planning permission to be refused.

**246.** Conditions should be drafted in a way which ensures that hydraulic fracturing does not take place where permission for such operations is not sought and that any subsequent application to do so is subject to appropriate consultation. If such operations are subsequently proposed, they should, as a matter of planning policy, be regarded as a substantial change in the description of the development for which planning permission is sought or a material variation to the existing planning permission. Where PEDL and Underground Coal licences are granted for the same or overlapping areas, consideration should be given to the most efficient sequencing of extraction.

**247.** The Scottish Government is currently exploring a range of options relating to the effective regulation of surface coal mining. This is likely to result in further guidance on effective restoration measures in due course. In the meantime, planning authorities should, through planning conditions and legal agreements, continue to ensure that a high standard of restoration and aftercare is managed effectively and that such work is undertaken at the earliest opportunity. A range of financial guarantee options is currently available and planning authorities should consider the most effective solution on a site-by-site basis. All solutions should provide assurance and clarity over the amount and period of the guarantee and in particular, where it is a bond, the risks covered (including operator failure) and the triggers for calling in a bond, including payment terms. In the aggregates sector, an operator may be able to demonstrate adequate provision under an industry-funded guarantee scheme.

**248.** Planning authorities should ensure that rigorous procedures are in place to monitor consents, including restoration arrangements, at appropriate intervals, and ensure that appropriate action is taken when necessary. The review of mineral permissions every 15 years should be used to apply up-to-date operating and environmental standards although requests from operators to postpone reviews should be considered favourably if existing conditions are already achieving acceptable standards. Conditions should not impose undue restrictions on consents at quarries for building or roofing stone to reflect the likely intermittent or low rate of working at such sites.

# Supporting Aquaculture

## NPF Context

**249.** Aquaculture makes a significant contribution to the Scottish economy, particularly for coastal and island communities. Planning can help facilitate sustainable aquaculture whilst protecting and maintaining the ecosystem upon which it depends. Planning can play a role in supporting the sectoral growth targets to grow marine finfish (including farmed Atlantic salmon) production sustainably to 210,000 tonnes; and shellfish, particularly mussels, sustainably to 13,000 tonnes with due regard to the marine environment by 2020.

## Policy Principles

**250.** The planning system should:

- play a supporting role in the sustainable growth of the finfish and shellfish sectors to ensure that the aquaculture industry is diverse, competitive and economically viable;
- guide development to coastal locations that best suit industry needs with due regard to the marine environment;
- maintain a presumption against further marine finfish farm developments on the north and east coasts to safeguard migratory fish species.

## Key Documents

- National Marine Plan

## Delivery

### Development Planning

**251.** Local development plans should make positive provision for aquaculture developments. Plans, or supplementary guidance, should take account of Marine Scotland's locational policies when identifying areas potentially suitable for new development and sensitive areas which are unlikely to be appropriate for such development. They should also set out the issues that will be considered when assessing specific proposals, which could include:

- impacts on, and benefits for, local communities;
- economic benefits of the sustainable development of the aquaculture industry;
- landscape, seascape and visual impact;
- biological carrying capacity;
- effects on coastal and marine species (including wild salmonids) and habitats;
- impacts on the historic environment and the sea or loch bed;
- interaction with other users of the marine environment (including commercial fisheries, Ministry of Defence, navigational routes, ports and harbours, anchorages, tourism, recreational and leisure activities); and
- cumulative effects on all of the above factors.

## Development Management

**252.** Applications should be supported, where necessary, by sufficient information to demonstrate:

- operational arrangements (including noise, light, access, waste and odour) are satisfactory and sufficient mitigation plans are in place; and
- the siting and design of cages, lines and associated facilities are appropriate for the location. This should be done through the provision of information on the extent of the site; the type, number and physical scale of structures; the distribution of the structures across the planning area; on-shore facilities; and ancillary equipment.

**253.** Any land-based facilities required for the proposal should, where possible, be considered at the same time. The planning system should not duplicate other control regimes such as controlled activities regulation licences from SEPA or fish health, sea lice and containment regulation by Marine Scotland.

## Managing Flood Risk and Drainage

### NPF Context

**254.** NPF3 supports a catchment-scale approach to sustainable flood risk management. The spatial strategy aims to build the resilience of our cities and towns, encourage sustainable land management in our rural areas, and to address the long-term vulnerability of parts of our coasts and islands. Flooding can impact on people and businesses. Climate change will increase the risk of flooding in some parts of the country. Planning can play an important part in reducing the vulnerability of existing and future development to flooding.

### Policy Principles

**255.** The planning system should promote:

- a precautionary approach to **flood risk** from all sources, including coastal, water course (fluvial), surface water (**pluvial**), groundwater, reservoirs and drainage systems (sewers and culverts), taking account of the predicted effects of climate change;
- **flood** avoidance: by safeguarding flood storage and conveying capacity, and locating development away from **functional flood plains** and medium to high risk areas;
- flood reduction: assessing flood risk and, where appropriate, undertaking natural and structural flood management measures, including flood protection, restoring natural features and characteristics, enhancing flood storage capacity, avoiding the construction of new culverts and opening existing culverts where possible; and
- avoidance of increased surface water flooding through requirements for Sustainable Drainage Systems (SuDS) and minimising the area of impermeable surface.

**256.** To achieve this the planning system should prevent development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere. Piecemeal reduction of the functional floodplain should be avoided given the cumulative effects of reducing storage capacity.

**257.** Alterations and small-scale extensions to existing buildings are outwith the scope of this policy, provided that they would not have a significant effect on the storage capacity of the functional floodplain or local flooding problems.



## Key Documents

- [Flood Risk Management \(Scotland\) Act 2009](#)<sup>105</sup>
- Updated Planning Advice Note on Flooding
- [Delivering Sustainable Flood Risk Management](#)<sup>106</sup> (Scottish Government, 2011).
- [Surface Water Management Planning Guidance](#)<sup>107</sup> (Scottish Government, 2013).

## Delivery

**258.** Planning authorities should have regard to the probability of flooding from all sources and take flood risk into account when preparing development plans and determining planning applications. The calculated probability of flooding should be regarded as a best estimate and not a precise forecast. Authorities should avoid giving any indication that a grant of planning permission implies the absence of flood risk.

**259.** Developers should take into account flood risk and the ability of future occupiers to insure development before committing themselves to a site or project, as applicants and occupiers have ultimate responsibility for safeguarding their property.

## Development Planning

**260.** Plans should use [strategic flood risk assessment](#) (SFRA) to inform choices about the location of development and policies for flood risk management. They should have regard to the flood maps prepared by Scottish Environment Protection Agency (SEPA), and take account of finalised and approved Flood Risk Management Strategies and Plans and River Basin Management Plans.

**261.** Strategic and local development plans should address any significant cross boundary flooding issues. This may include identifying major areas of the [flood plain](#) and storage capacity which should be protected from inappropriate development, major flood protection scheme requirements or proposals, and relevant drainage capacity issues.

**262.** Local development plans should protect land with the potential to contribute to managing flood risk, for instance through natural flood management, managed coastal realignment, [washland](#) or green infrastructure creation, or as part of a scheme to manage flood risk.

**263.** Local development plans should use the following flood risk framework to guide development. This sets out three categories of coastal and watercourse flood risk, together with guidance on surface water flooding, and the appropriate planning approach for each (the annual probabilities referred to in the framework relate to the land at the time a plan is being prepared or a planning application is made):

- **Little or No Risk** – annual probability of coastal or [watercourse](#) flooding is less than 0.1% (1:1000 years)
  - No constraints due to coastal or watercourse flooding.

<sup>105</sup> [www.legislation.gov.uk/asp/2009/6/contents](http://www.legislation.gov.uk/asp/2009/6/contents)

<sup>106</sup> [www.scotland.gov.uk/Publications/2011/06/15150211/0](http://www.scotland.gov.uk/Publications/2011/06/15150211/0)

<sup>107</sup> <http://www.scotland.gov.uk/Publications/2013/02/7909/0>

- **Low to Medium Risk** – annual probability of coastal or watercourse flooding is between 0.1% and 0.5% (1:1000 to 1:200 years)
  - Suitable for most development. A flood risk assessment may be required at the upper end of the probability range (i.e. close to 0.5%), and for **essential infrastructure** and the **most vulnerable uses**. Water resistant materials and construction may be required.
  - Generally not suitable for **civil infrastructure**. Where civil infrastructure must be located in these areas or is being substantially extended, it should be designed to be capable of remaining operational and accessible during extreme flood events.
- **Medium to High Risk** – annual probability of coastal or watercourse flooding is greater than 0.5% (1:200 years)
  - May be suitable for:
    - residential, institutional, commercial and industrial development within built-up areas provided flood protection measures to the appropriate standard already exist and are maintained, are under construction, or are a planned measure in a current flood risk management plan;
    - essential infrastructure within built-up areas, designed and constructed to remain operational during floods and not impede water flow;
    - some recreational, sport, amenity and nature conservation uses, provided appropriate evacuation procedures are in place; and
    - job-related accommodation, e.g. for caretakers or operational staff.
  - Generally not suitable for:
    - civil infrastructure and the most vulnerable uses;
    - additional development in undeveloped and sparsely developed areas, unless a location is essential for operational reasons, e.g. for navigation and water-based recreation, agriculture, transport or utilities infrastructure (which should be designed and constructed to be operational during floods and not impede water flow), and an alternative, lower risk location is not available; and
    - new caravan and camping sites.
  - Where built development is permitted, measures to protect against or manage flood risk will be required and any loss of flood storage capacity mitigated to achieve a neutral or better outcome.
  - Water-resistant materials and construction should be used where appropriate. Elevated buildings on structures such as stilts are unlikely to be acceptable.

## Surface Water Flooding

- Infrastructure and buildings should generally be designed to be free from surface water flooding in rainfall events where the annual probability of occurrence is greater than 0.5% (1:200 years).
- Surface water drainage measures should have a neutral or better effect on the risk of flooding both on and off the site, taking account of rain falling on the site and run-off from adjacent areas.

## Development Management

**264.** It is not possible to plan for development solely according to the calculated probability of flooding. In applying the risk framework to proposed development, the following should therefore be taken into account:

- the characteristics of the site;
- the design and use of the proposed development;
- the size of the area likely to flood;
- depth of flood water, likely flow rate and path, and rate of rise and duration;
- the vulnerability and risk of wave action for coastal sites;
- committed and existing flood protection methods: extent, standard and maintenance regime;
- the effects of climate change, including an [allowance for freeboard](#);
- surface water run-off from adjoining land;
- culverted watercourses, drains and field drainage;
- cumulative effects, especially the loss of storage capacity;
- cross-boundary effects and the need for consultation with adjacent authorities;
- effects of flood on access including by emergency services; and
- effects of flood on proposed open spaces including gardens.

**265.** Land raising should only be considered in exceptional circumstances, where it is shown to have a neutral or better impact on flood risk outside the raised area. Compensatory storage may be required.

**266.** The flood risk framework set out above should be applied to development management decisions. Flood Risk Assessments (FRA) should be required for development in the medium to high category of flood risk, and may be required in the low to medium category in the circumstances described in the framework above, or where other factors indicate heightened risk. FRA will generally be required for applications within areas identified at high or medium likelihood of flooding/flood risk in SEPA's flood maps.

**267.** Drainage Assessments, proportionate to the development proposal and covering both surface and foul water, will be required for areas where drainage is already constrained or otherwise problematic, or if there would be off-site effects.

**268.** Proposed arrangements for SuDS should be adequate for the development and appropriate long-term maintenance arrangements should be put in place.

# A Connected Place

## Promoting Sustainable Transport and Active Travel

### NPF Context

**269.** The spatial strategy set out in NPF3 is complemented by an ongoing programme of investment in transport infrastructure. The economy relies on efficient transport connections, within Scotland and to international markets. Planning can play an important role in improving connectivity and promoting more sustainable patterns of transport and travel as part of the transition to a low carbon economy.

### Policy Principles

**270.** The planning system should support patterns of development which:

- optimise the use of existing infrastructure;
- reduce the need to travel;
- provide safe and convenient opportunities for walking and cycling for both active travel and recreation, and facilitate travel by public transport;
- enable the integration of transport modes; and
- facilitate freight movement by rail or water.

**271.** Development plans and development management decisions should take account of the implications of development proposals on traffic, patterns of travel and road safety.

### Key Documents

- [National Transport Strategy](#)<sup>108</sup>
- [Climate Change \(Scotland\) Act 2009](#)<sup>109</sup>
- [Low Carbon Scotland: Meeting the Emissions Reduction Targets 2013-2027](#)<sup>110</sup>
- [Infrastructure Investment Plan](#)<sup>111</sup>
- [Strategic Transport Projects Review](#)<sup>112</sup>
- [Transport Assessment Guidance](#)<sup>113</sup>
- [Development Planning and Management Transport Appraisal Guidance \(DPMTAG\)](#)<sup>114</sup>
- [PAN 66: Best Practice in Handling Applications Affecting Trunk Roads](#)<sup>115</sup>

108 [www.scotland.gov.uk/Publications/2006/12/04104414/0](http://www.scotland.gov.uk/Publications/2006/12/04104414/0)

109 [www.legislation.gov.uk/asp/2009/12/contents](http://www.legislation.gov.uk/asp/2009/12/contents)

110 [www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/lowcarbon/meetingthetargets](http://www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/lowcarbon/meetingthetargets)

111 [www.scotland.gov.uk/Publications/2011/12/05141922/0](http://www.scotland.gov.uk/Publications/2011/12/05141922/0)

112 [www.transportscotland.gov.uk/strategic-transport-projects-review](http://www.transportscotland.gov.uk/strategic-transport-projects-review)

113 [www.transportscotland.gov.uk/system/files/documents/tsc-basic-pages/Planning\\_Reform\\_-\\_DPMTAG\\_-\\_Development\\_Management\\_DPMTAG\\_Ref\\_17\\_-\\_Transport\\_Assessment\\_Guidance\\_FINAL\\_-\\_June\\_2012.pdf](http://www.transportscotland.gov.uk/system/files/documents/tsc-basic-pages/Planning_Reform_-_DPMTAG_-_Development_Management_DPMTAG_Ref_17_-_Transport_Assessment_Guidance_FINAL_-_June_2012.pdf)

114 [www.transportscotland.gov.uk/development-planning-and-management-transport-appraisal-guidance-dpmtag](http://www.transportscotland.gov.uk/development-planning-and-management-transport-appraisal-guidance-dpmtag)

115 [www.scotland.gov.uk/Resource/Doc/47021/0026434.pdf](http://www.scotland.gov.uk/Resource/Doc/47021/0026434.pdf)



- [Design Manual for Roads and Bridges](#)<sup>116</sup>
- [Designing Streets](#)<sup>117</sup>
- [Roads for All](#)<sup>118</sup>
- [Cycling Action Plan in Scotland](#)<sup>119</sup> (CAPS)
- [Let's Get Scotland Walking: The National Walking Strategy](#)<sup>120</sup>
- [A More Active Scotland – Building a Legacy from the Commonwealth Games](#)<sup>121</sup>
- [Switched On Scotland: A Roadmap to Widespread Adoption of Plug-in Vehicles](#)<sup>122</sup>
- [Tourism Development Framework for Scotland](#)<sup>123</sup>

## Delivery

### Development Planning

**272.** Development plans should take account of the relationship between land use and transport and particularly the capacity of the existing transport network, environmental and operational constraints, and proposed or committed transport projects.

**273.** The spatial strategies set out in plans should support development in locations that allow walkable access to local amenities and are also accessible by cycling and public transport. Plans should identify active travel networks and promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars. The aim is to promote development which maximises the extent to which its travel demands are met first through walking, then cycling, then public transport and finally through use of private cars. Plans should facilitate integration between transport modes.

**274.** In preparing development plans, planning authorities are expected to appraise the impact of the spatial strategy and its reasonable alternatives on the transport network, in line with Transport Scotland's DPMTAG guidance. This should include consideration of previously allocated sites, transport opportunities and constraints, current capacity and committed improvements to the transport network. Planning authorities should ensure that a transport appraisal is undertaken at a scale and level of detail proportionate to the nature of the issues and proposals being considered, including funding requirements. Appraisals should be carried out in time to inform the spatial strategy and the strategic environmental assessment. Where there are potential issues for the [strategic transport network](#), the appraisal should be discussed with Transport Scotland at the earliest opportunity.

<sup>116</sup> [www.dft.gov.uk/ha/standards/dmr/index.htm](http://www.dft.gov.uk/ha/standards/dmr/index.htm)

<sup>117</sup> [www.scotland.gov.uk/Publications/2010/03/22120652/0](http://www.scotland.gov.uk/Publications/2010/03/22120652/0)

<sup>118</sup> <http://www.transportscotland.gov.uk/guides/j256264-00.htm>

<sup>119</sup> [www.transportscotland.gov.uk/strategy-and-research/publications-and-consultations/cycling-action-plan-2013](http://www.transportscotland.gov.uk/strategy-and-research/publications-and-consultations/cycling-action-plan-2013)

<sup>120</sup> [www.scotland.gov.uk/Publications/2014/06/5743](http://www.scotland.gov.uk/Publications/2014/06/5743)

<sup>121</sup> [www.scotland.gov.uk/Publications/2014/02/8239/0](http://www.scotland.gov.uk/Publications/2014/02/8239/0)

<sup>122</sup> [www.transportscotland.gov.uk/report/j272736-00.htm](http://www.transportscotland.gov.uk/report/j272736-00.htm)

<sup>123</sup> [www.visitscotland.org/pdf/Tourism%20Development%20Framework%20-%20FINAL.pdf](http://www.visitscotland.org/pdf/Tourism%20Development%20Framework%20-%20FINAL.pdf)

**275.** Development plans should identify any required new transport infrastructure or public transport services, including cycle and pedestrian routes, trunk road and rail infrastructure. The deliverability of this infrastructure, and by whom it will be delivered, should be key considerations in identifying the preferred and alternative land use strategies. Plans and associated documents, such as supplementary guidance and the action programme, should indicate how new infrastructure or services are to be delivered and phased, and how and by whom any developer contributions will be made. These should be prepared in consultation with all of the parties responsible for approving and delivering the infrastructure. Development plans should support the provision of infrastructure necessary to support positive changes in transport technologies, such as charging points for electric vehicles.

**276.** Where public transport services required to serve a new development cannot be provided commercially, a contribution from the developer towards an agreed level of service may be appropriate. The development plan action programme should set out how this will be delivered, and the planning authority should coordinate discussions with the public transport provider, developer, Transport Scotland where appropriate, and relevant regional transport partnerships at an early stage in the process. In rural areas the plan should be realistic about the likely viability of public transport services and innovative solutions such as demand-responsive public transport and small-scale park and ride facilities at nodes on rural bus corridors should be considered.

**277.** Disused railway lines with a reasonable prospect of being reused as rail, tram, bus rapid transit or active travel routes should be safeguarded in development plans. The strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance. Any appraisal should include consideration of making best use of current rail services; and should demonstrate that the needs of local communities, workers or visitors are sufficient to generate a high level of demand, and that there would be no adverse impact on the operation of the rail service franchise. Funding partners must be identified. Agreement should be reached with Transport Scotland and Network Rail before rail proposals are included in a development plan or planning application and it should be noted that further technical assessment and design work will be required before any proposed new station can be confirmed as viable.

**278.** While new junctions on trunk roads are not normally acceptable, the case for a new junction will be considered where the planning authority considers that significant economic growth or regeneration benefits can be demonstrated. New junctions will only be considered if they are designed in accordance with DMRB and where there would be no adverse impact on road safety or operational performance.

**279.** Significant travel-generating uses should be sited at locations which are well served by public transport, subject to parking restraint policies, and supported by measures to promote the availability of high-quality public transport services. New development areas should be served by public transport providing access to a range of destinations. Development plans should indicate when a travel plan will be required to accompany a proposal for a development which will generate significant travel.

**280.** Along with sound choices on the location of new development, appropriate street layout and design are key to achieving the policy principles at paragraph 270. The design of all new development should follow the placemaking approach set out in this SPP and the principles of Designing Streets, to ensure the creation of places which are distinctive, welcoming, adaptable, resource efficient, safe and pleasant and easy to move around and beyond.

**281.** National maximum parking standards for certain types and scales of development have been set to promote consistency (see [Annex B: Parking Policies and Standards](#)). Where an area is well served by sustainable transport modes, planning authorities may set more restrictive standards, and where public transport provision is limited, planning authorities may set less restrictive standards. Local authorities should also take account of relevant town centre strategies when considering appropriate parking provision (see paragraphs 64-65 and [Annex A: Town Centre Health Checks and Strategies](#)).

**282.** When preparing development plans, planning authorities should consider the need for improved and additional freight transfer facilities. Strategic freight sites should be safeguarded in development plans. Existing roadside facilities and provision for lorry parking should be safeguarded and, where required, development plans should make additional provision for the overnight parking of lorries at appropriate locations on routes with a high volume of lorry traffic. Where appropriate, development plans should also identify suitable locations for new or expanded rail freight interchanges to support increased movement of freight by rail. Facilities allowing the transfer of freight from road to rail or water should also be considered.

**283.** Planning authorities and port operators should work together to address the planning and transport needs of ports and opportunities for rail access should be safeguarded in development plans. Planning authorities should ensure that there is appropriate road access to ferry terminals for cars and freight, and support the provision of bus and train interchange facilities.

**284.** Planning authorities, airport operators and other stakeholders should work together to prepare airport masterplans and address other planning and transport issues relating to airports. Relevant issues include public safety zone safeguarding, surface transport access for supplies, air freight, staff and passengers, related on- and off-site development such as transport interchanges, offices, hotels, car parks, warehousing and distribution services, and other development benefiting from good access to the airport.

**285.** Canals, which are scheduled monuments, should be safeguarded as assets which can contribute to sustainable economic growth through sensitive development and regeneration. Consideration should be given to planning for new uses for canals, where appropriate.

## Development Management

**286.** Where a new development or a change of use is likely to generate a significant increase in the number of trips, a transport assessment should be carried out. This should identify any potential [cumulative effects](#) which need to be addressed.

**287.** Planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car and where:

- direct links to local facilities via walking and cycling networks are not available or cannot be made available;
- access to local facilities via public transport networks would involve walking more than 400m; or
- the transport assessment does not identify satisfactory ways of meeting sustainable transport requirements.

Guidance is available in [Transport Assessment and Implementation: A Guide](#)<sup>124</sup>

<sup>124</sup> [www.scotland.gov.uk/Publications/2005/08/1792325/23264](http://www.scotland.gov.uk/Publications/2005/08/1792325/23264)

**288.** Buildings and facilities should be accessible by foot and bicycle and have appropriate operational and servicing access for large vehicles. Cycle routes, cycle parking and storage should be safeguarded and enhanced wherever possible.

**289.** Consideration should be given to how proposed development will contribute to fulfilling the objectives of Switched On Scotland – A Roadmap to Widespread Adoption of Plug-in Vehicles. Electric vehicle charge points should always be considered as part of any new development and provided where appropriate.

**290.** Development proposals that have the potential to affect the performance or safety of the strategic transport network need to be fully assessed to determine their impact. Where existing infrastructure has the capacity to accommodate a development without adverse impacts on safety or unacceptable impacts on operational performance, further investment in the network is not likely to be required. Where such investment is required, the cost of the mitigation measures required to ensure the continued safe and effective operation of the network will have to be met by the developer.

**291.** Consideration should be given to appropriate planning restrictions on construction and operation related transport modes when granting planning permission, especially where bulk material movements are expected, for example freight from extraction operations.

## Supporting Digital Connectivity

### NPF Context

**292.** NPF3 highlights the importance of our digital infrastructure, across towns and cities, and in particular our more remote rural and island areas. Our economy and social networks depend heavily on high-quality digital infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across Scotland.

### Policy Principles

**293.** The planning system should support:

- development which helps deliver the Scottish Government's commitment to world-class digital connectivity;
- the need for networks to evolve and respond to technology improvements and new services;
- inclusion of digital infrastructure in new homes and business premises; and
- infrastructure provision which is sited and designed to keep environmental impacts to a minimum.

### Key Documents

- [Scotland's Digital Future](#)<sup>125</sup> and associated [Infrastructure Action Plan](#)<sup>126</sup>
- [Scotland's Cities: Delivering for Scotland](#)<sup>127</sup>
- [A National Telehealth and Telecare Delivery Plan for Scotland to 2015](#)<sup>128</sup>

<sup>125</sup> [www.scotland.gov.uk/Resource/Doc/981/0114237.pdf](http://www.scotland.gov.uk/Resource/Doc/981/0114237.pdf)

<sup>126</sup> [www.scotland.gov.uk/Publications/2012/01/1487](http://www.scotland.gov.uk/Publications/2012/01/1487)

<sup>127</sup> [www.scotland.gov.uk/Publications/2012/01/05104741/0](http://www.scotland.gov.uk/Publications/2012/01/05104741/0)

<sup>128</sup> [www.scotland.gov.uk/Resource/0041/00411586.pdf](http://www.scotland.gov.uk/Resource/0041/00411586.pdf)



- [Planning Advice Note 62, Radio Telecommunications provides advice on siting and design](#)<sup>129</sup>
- [Circular 2/2003: Safeguarding of Aerodromes, Technical Sites and Military Explosives Storage Areas](#)<sup>130</sup>

## Delivery

### Development Planning

**294.** Local development plans should reflect the infrastructure roll-out plans of digital communications operators, community groups and others, such as the Scottish Government, the UK Government and local authorities.

**295.** Local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment. They should ensure that the following options are considered when selecting sites and designing base stations:

- mast or site sharing;
- installation on buildings or other existing structures;
- installing the smallest suitable equipment, commensurate with technological requirements;
- concealing or disguising masts, antennas, equipment housing and cable runs using design and camouflage techniques where appropriate; and
- installation of ground-based masts.

**296.** Local development plans should set out the matters to be addressed in planning applications for specific developments, including:

- an explanation of how the proposed equipment fits into the wider network;
- a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;
- details of the design, including height, materials and all components of the proposal;
- details of any proposed landscaping and screen planting, where appropriate;
- an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;
- a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation<sup>131</sup>; and
- an assessment of visual impact, if relevant.

**297.** Policies should encourage developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development. This should be done in consultation with service providers so that appropriate, universal and future-proofed infrastructure is installed and utilised.

<sup>129</sup> [www.scotland.gov.uk/Publications/2001/09/pan62/pan62-](http://www.scotland.gov.uk/Publications/2001/09/pan62/pan62-)

<sup>130</sup> [www.scotland.gov.uk/Publications/2003/01/16204/17030](http://www.scotland.gov.uk/Publications/2003/01/16204/17030)

<sup>131</sup> The radiofrequency public exposure guidelines of the International Commission on Non-Ionising Radiation Protection, as expressed in EU Council recommendation 1999/519/ EC on the limitation of exposure of the general public to electromagnetic fields.

## Development Management

**298.** Consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government's World Class 2020 document. For developments that will deliver entirely new connectivity – for example, mobile connectivity in a “not spot” – consideration should be given to the benefits of this connectivity for communities and the local economy.

**299.** All components of equipment should be considered together and designed and positioned as sensitively as possible, though technical requirements and constraints may limit the possibilities. Developments should not physically obstruct aerodrome operations, technical sites or existing transmitter/receiver facilities. The cumulative visual effects of equipment should be taken into account.

**300.** Planning authorities should not question the need for the service to be provided nor seek to prevent competition between operators. The planning system should not be used to secure objectives that are more properly achieved under other legislation. Emissions of radiofrequency radiation are controlled and regulated under other legislation and it is therefore not necessary for planning authorities to treat radiofrequency radiation as a material consideration.

## Annex A – Town Centre Health Checks and Strategies

**Town centre health checks should cover a range of indicators, such as:**

### **Activities**

- retailer representation and intentions (multiples and independents);
- employment;
- cultural and social activity;
- community activity;
- leisure and tourism facilities;
- resident population; and
- evening/night-time economy.

### **Physical environment**

- space in use for the range of town centre functions and how it has changed;
- physical structure of the centre, condition and appearance including constraints and opportunities and assets;
- historic environment; and
- public realm and green infrastructure.

### **Property**

- vacancy rates, particularly at street level in prime retail areas;
- vacant sites;
- committed developments;
- commercial yield; and
- prime rental values.

### **Accessibility**

- pedestrian footfall;
- accessibility;
- cycling facilities and ease of movement;
- public transport infrastructure and facilities;
- parking offer; and
- signage and ease of navigation.

### **Community**

- attitudes, perceptions and aspirations.

## Town centre strategies should:

- be prepared collaboratively with community planning partners, businesses and the local community;
- recognise the changing roles of town centres and networks, and the effect of trends in consumer activity;
- establish an agreed long-term vision for the town centre;
- seek to maintain and improve accessibility to and within the town centre;
- seek to reduce the centre's environmental footprint, through, for example, the development or extension of sustainable urban drainage or district heating networks;
- identify how green infrastructure can enhance air quality, open space, landscape/settings, reduce urban heat island effects, increase capacity of drainage systems, and attenuate noise;
- indicate the potential for change through redevelopment, renewal, alternative uses and diversification based on an analysis of the role and function of the centre;
- promote opportunities for new development, using master planning and design, while seeking to safeguard and enhance built and natural heritage;
- consider constraints such as fragmented site ownership, unit size and funding availability, and recognise the rapidly changing nature of retail formats;
- identify actions, tools and delivery mechanisms to overcome these constraints, for example improved management, Town Teams, Business Improvement Districts or the use of [compulsory purchase powers](#)<sup>132</sup>; and
- include monitoring against the baseline provided by the health check to assess the extent to which it has delivered improvements.

More detailed advice on town centre health checks and strategies can be found in the Town Centre Masterplanning Toolkit.

<sup>132</sup> [www.scotland.gov.uk/Topics/archive/National-Planning-Policy/themes/ComPur](http://www.scotland.gov.uk/Topics/archive/National-Planning-Policy/themes/ComPur)

## Annex B – Parking Policies and Standards

### **Parking Restraint Policy – National Maximum Parking Standards for New Development**

In order to achieve consistency in the levels of parking provision for specific types and scales of development, the following national standards have been set:

- retail (food) (Use Class 1) 1000m<sup>2</sup> and above – up to 1 space per 14m<sup>2</sup>;
- retail (non-food) (Use Class 1) 1000m<sup>2</sup> and above – up to 1 space per 20m<sup>2</sup>;
- business (Use Class 4) 2500m<sup>2</sup> and above – up to 1 space per 30m<sup>2</sup>;
- cinemas (Use Class 11a) 1000m<sup>2</sup> and above – up to 1 space per 5 seats;
- conference facilities 1000m<sup>2</sup> and above – up to 1 space per 5 seats;
- stadia 1500 seats and above – up to 1 space per 15 seats;
- leisure (other than cinemas and stadia) 1000m<sup>2</sup> and above – up to 1 space per 22m<sup>2</sup>; and
- higher and further education (non-residential elements) 2500m<sup>2</sup> and above – up to 1 space per 2 staff plus 1 space per 15 students.

Local standards should support the viability of town centres. Developers of individual sites within town centres may be required to contribute to the overall parking requirement for the centre in lieu of individual parking provision.

### **Parking for Disabled People – Minimum Provision Standards for New Development**

Specific provision should be made for parking for disabled people in addition to general provision. In retail, recreation and leisure developments, the minimum number of car parking spaces for disabled people should be:

- 3 spaces or 6% (whichever is greater) in car parks with up to 200 spaces; or
- 4 spaces plus 4% in car parks with more than 200 spaces.

Employers have a duty under employment law to consider the disabilities of their employees and visitors to their premises. The minimum number of car parking spaces for disabled people at places of employment should be:

- 1 space per disabled employee plus 2 spaces or 5% (whichever is greater) in car parks with up to 200 spaces; or
- 6 spaces plus 2% in car parks with more than 200 spaces.



# Glossary

Affordable housing	Housing of a reasonable quality that is affordable to people on modest incomes.
Anchor development (in the context of heat demand)	A large scale development which has a constant high demand for heat.
Article 4 Direction	Article 4 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 gives the Scottish Government and planning authorities the power to remove permitted development rights by issuing a direction.
Biodiversity	The variability in living organisms and the ecological complexes of which they are part. This includes diversity within species, between species and of ecosystems (UN Convention on Biological Diversity, 1992).
Brownfield land	Land which has previously been developed. The term may cover vacant or derelict land, land occupied by redundant or unused building and developed land within the settlement boundary where further intensification of use is considered acceptable.
Civil infrastructure (in the context of flood risk)	Hospitals, fire stations, emergency depots, schools, care homes, ground-based electrical and telecommunications equipment.
Climate change adaptation	The adjustment in economic, social or natural systems in response to actual or expected climatic change, to limit harmful consequences and exploit beneficial opportunities.
Climate change mitigation	Reducing the amount of greenhouse gases in the atmosphere and reducing activities which emit greenhouse gases to help slow down or make less severe the impacts of future climate change.
Community	A body of people. A community can be based on location (for example people who live or work in or use an area) or common interest (for example the business community, sports or heritage groups).
Cumulative impact	Impact in combination with other development. That includes existing developments of the kind proposed, those which have permission, and valid applications which have not been determined. The weight attached to undetermined applications should reflect their position in the application process.
Cumulative effects (in the context of the strategic transport network)	The effect on the operational performance of transport networks of a number of developments in combination, recognising that the effects of a group of sites, or development over an area may need different mitigation when considered together than when considered individually.

Ecosystems services	The benefits people obtain from ecosystems; these include provisioning services such as food, water, timber and fibre; regulating services that affect climate, floods, disease, waste and water quality; cultural services with recreational, aesthetic, and spiritual benefits; and supporting services such as soil formation, photosynthesis and nutrient cycling.
Effective housing land supply	The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration and will therefore be available for the construction of housing.
Energy Centre	A stand alone building or part of an existing or proposed building where heat or combined heat and electricity generating plant can be installed to service a district network.
Essential infrastructure (in a flood risk area for operational reasons)	Defined in SEPA guidance on vulnerability as 'essential transport infrastructure and essential utility infrastructure which may have to be located in a flood risk area for operational reasons. This includes electricity generating stations, power stations and grid and primary sub stations, water treatments works and sewage treatment works and wind turbines'.
Flood	The temporary covering by water from any source of land not normally covered by water, but not including the overflow of a sewage system.
Flood plain	The generally flat areas adjacent to a watercourse or the sea where water flows in time of flood or would flow but for the presence of flood prevention measures. The limits of a flood plain are defined by the peak water level of an appropriate return period event. See also 'Functional flood plain'.
Flood risk	The combination of the probability of a flood and the potential adverse consequences associated with a flood, for human health, the environment, cultural heritage and economic activity.
Freeboard allowance	A height added to the predicted level of a flood to take account of the height of waves or turbulence and uncertainty in estimating the probability of the flooding.
Functional flood plain	The areas of land where water flows in times of flood which should be safeguarded from further development because of their function as flood water storage areas. For planning purposes the functional floodplain will generally have a greater than 0.5% (1:200) probability of flooding in any year. See also 'Washland'.
Green infrastructure	Includes the 'green' and 'blue' (water environment) features of the natural and built environments that can provide benefits without being connected.  Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges and gardens.  Blue features include rivers, lochs, wetlands, canals, other water courses, ponds, coastal and marine areas including beaches, porous paving and sustainable urban drainage systems.

Green networks	Connected areas of green infrastructure and open space that together form an integrated and multi-functional network.
Hazardous substances	Substances and quantities as currently specified in and requiring consent under the Town and Country Planning (Hazardous Substances) (Scotland) Regulations 1993 as amended (due to be replaced in 2015 as part of the implementation of Directive 2012/18/EU).
Historic environment	Scotland's historic environment is the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand.
Historic Marine Protected Areas	Areas designated in Scottish territorial waters (0-12 miles) under the Marine (Scotland) Act 2010 for the purpose of preserving marine historic assets of national importance.
Housing supply target	The total number of homes that will be delivered.
Hut	A simple building used intermittently as recreational accommodation (ie. not a principal residence); having an internal floor area of no more than 30m <sup>2</sup> ; constructed from low impact materials; generally not connected to mains water, electricity or sewerage; and built in such a way that it is removable with little or no trace at the end of its life. Huts may be built singly or in groups.
Major-accident hazard site	Site with or requiring hazardous substances consent.
Most vulnerable uses (in the context of flood risk and drainage)	Basement dwellings, isolated dwellings in sparsely populated areas, dwelling houses behind informal embankments, residential institutions such as residential care homes/prisons, nurseries, children's homes and educational establishments, caravans, mobile homes and park homes intended for permanent residential use, sites used for holiday or short-let caravans and camping, installations requiring hazardous substance consent.
National Nature Reserve (NNR)	An area considered to be of national importance for its nature conservation interests.
National Scenic Area (NSA)	An area which is nationally important for its scenic quality.
Open space	Space within and on the edge of settlements comprising green infrastructure and/or civic areas such as squares, market places and other paved or hard landscaped areas with a civic function.  Detailed typologies of open space are included in PAN65.

Outdoor sports facilities	<p>Uses where <b>sportscotland</b> is a statutory consultee under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, which establishes 'outdoor sports facilities' as land used as:</p> <p>(a) an outdoor playing field extending to not less than 0.2ha used for any sport played on a pitch;</p> <p>(b) an outdoor athletics track;</p> <p>(c) a golf course;</p> <p>(d) an outdoor tennis court, other than those within a private dwelling, hotel or other tourist accommodation; and</p> <p>(e) an outdoor bowling green.</p>
Outstanding Universal Value (OUV)	<p>The Operational Guidelines for the Implementation of the World Heritage Convention, provided by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) states that OUV means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. The Statement of OUV is the key reference for the future effective protection and management of the World Heritage Site.</p>
PADHI	<p>Planning Advice for Development near Hazardous Installations, issued by the Health and Safety Executive.</p>
Prime agricultural land	<p>Agricultural land identified as being Class 1, 2 or 3.1 in the land capability classification for agriculture developed by Macaulay Land Use Research Institute (now the James Hutton Institute).</p>
Place	<p>The environment in which we live; the people that inhabit these spaces; and the quality of life that comes from the interaction of people and their surroundings. Architecture, public space and landscape are central to this.</p>
Pluvial flooding	<p>Flooding as a result of rainfall runoff flowing or ponding over the ground before it enters a natural (e.g. watercourse) or artificial (e.g. sewer) drainage system or when it cannot enter a drainage system (e.g. because the system is already full to capacity or the drainage inlets have a limited capacity).</p>
Ramsar sites	<p>Wetlands designated under the Ramsar Convention on Wetlands of International Importance.</p>
Scheduled monument	<p>Archaeological sites, buildings or structures of national or international importance. The purpose of scheduling is to secure the long-term legal protection of the monument in the national interest, in situ and as far as possible in its existing state and within an appropriate setting.</p>
Sensitive receptor	<p>Aspect of the environment likely to be significantly affected by a development, which may include for example, population, fauna, flora, soil, water, air, climatic factors, material assets, landscape and the inter-relationship between these factors.</p> <p>In the context of planning for Zero Waste, sensitive receptors may include aerodromes and military air weapon ranges.</p>

Setting	Is more than the immediate surroundings of a site or building, and may be related to the function or use of a place, or how it was intended to fit into the landscape of townscape, the view from it or how it is seen from areas round about, or areas that are important to the protection of the place, site or building.
Site of Special Scientific Interest (SSSI)	An area which is designated for the special interest of its flora, fauna, geology or geomorphological features.
Strategic Flood Risk Assessment	Provides an overview of flood risk in the area proposed for development. An assessment involves the collection, analysis and presentation of all existing available and readily derivable information on flood risk from all sources. SFRA applies a risk-based approach to identifying land for development and can help inform development plan flood risk policy and supplementary guidance.
Strategic Transport Network	Includes the trunk road and rail networks. Its primary purpose is to provide the safe and efficient movement of strategic long-distance traffic between major centres, although in rural areas it also performs important local functions.
Sustainable Development	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.  The Brundtland Definition. Our Common Future, The World Commission on Environment and Development, 1987.
Sustainable Economic Growth	Building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life too.
Washland	An alternative term for the functional flood plain which carries the connotation that it floods very frequently.
Watercourse	All means of conveying water except a water main or sewer.
Windfall Sites	Sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan.







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**w w w . s c o t l a n d . g o v . u k**

## **8. HISTORIC ENVIRONMENT SCOTLAND - POLICY FOR SCOTLAND**

# HISTORIC ENVIRONMENT POLICY FOR SCOTLAND



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

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## INTRODUCTION

The historic environment is our surroundings as they have been shaped, used and valued by people in the past, and continue to be today. It is central to our everyday lives and our sense of place, identity and wellbeing.

It is wide-ranging – including natural and built features – and it can be valued for both its tangible and intangible aspects.

The principles and policies that make up the Historic Environment Policy for Scotland (HEPS) help us to care collectively for this precious resource as we work towards a shared vision:



Scotland's historic environment is understood and valued, cared for and protected, enjoyed and enhanced. It is at the heart of a flourishing and sustainable Scotland and will be passed on with pride to benefit future generations"

**OUR PLACE IN TIME**

## WORDS AND PHRASES USED IN THIS POLICY

These are definitions of terms and phrases as they are used in this policy, to ensure that we are all using them in the same way. Some of the following definitions have been adopted from other sources (named in brackets).

### **asset**

An asset (or 'historic asset' or 'heritage asset') is a physical element of the historic environment – a building, monument, site, place, area or landscape identified as having cultural significance.

### **community**

A community is a group of people connected by location or by a common interest.

#### *community of place*

A community of place, or place-based community, is a group of people connected because of where they live, work, visit or otherwise spend a large amount of time. It can also refer to a group of people connected to a particular geographic location.

#### *communities of*

#### *practice and interest*

Communities of practice are groups of people who share a concern or a passion for a place or something they do.

A community of interest is a group of people who identify with or share a similar interest or experience.

## cultural heritage

Cultural heritage is an expression of the ways of living developed by a community and passed on from generation to generation. It can include customs, practices, places, objects, artistic expressions and values, aesthetic, historic, scientific, social or spiritual aspects. (ICOMOS 2002)

## cultural significance

Cultural significance means aesthetic, historic, scientific or social value for past, present or future generations. Cultural significance can be embodied in a place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. (Australia ICOMOS Burra Charter 2013)

## decision-maker

A decision-maker for the historic environment is anyone who has a role or interest in making decisions that might affect it. In this context the term often refers to planning authorities, but it could also mean individuals, public- or private-sector organisations, Ministers, communities or developers. The decisions might be about land use, funding, alterations to a building, site or place, or long-term strategies.

## historic environment

The historic environment is ‘the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand’. (*Our Place in Time, the Historic Environment Strategy for Scotland*)

## impact

The effect of changes on the historic environment is often referred to as the impact. This can be neutral, positive or negative. There can be impact on the physical elements of a place or on its setting, if its surroundings are changed so that our understanding, appreciation or experience is altered. Changes in the historic environment can also affect people’s associations with a place or its setting, and their responses to it.

## mitigation

Mitigation refers to ways in which we can minimise the impact on the historic environment, avoid it, or make it less damaging. Sometimes it is possible to offset the impact, compensating for it through positive actions.

## place

Place can refer to the environment in which we live, the people that inhabit these spaces and the quality of life that comes from the interaction of people and their surroundings. Architecture, public space and landscape are central to this. (*Creating Places: A Policy Statement on Architecture and Place for Scotland*)

## planning system

The planning system is the process by which local and national government bodies make decisions about how and where development should take place. Change to some designated sites and places is also managed through separate consent regimes.

## sustainable development

Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. (*World Commission on Environment and Development*)

## WHAT IS THE STATUS OF HEPS?

HEPS is a policy statement directing decision-making that affects the historic environment. It is non-statutory, which means that it is not required to be followed as a matter of law or statute. It is relevant to a wide range of decision-making at national and local levels. It is supported by detailed policy and guidance.

HEPS should be taken into account whenever a decision will affect the historic environment. This includes in plans and policies that deal with funding decisions or estate management, or other specific topics such as agriculture or energy. It is also a material consideration for planning proposals that might affect the

historic environment, and in relation to listed building consent and scheduled monument consent ('material consideration' means that decision-makers should take it into account when coming to a decision). Decisions on scheduled monument consent are made in line with Historic Environment Scotland's policy for determining consents at scheduled monuments (see 'Sources of further information and guidance').

The Scottish Government produces national policies for addressing land use matters and decisions. HEPS sits alongside these policies, and should be used with them.





## WHAT IS HEPS FOR?

HEPS is designed to support and enable good decision-making about changes to the historic environment. Good decision-making takes into account all aspects of the historic environment and the different ways people value it. Good decision-making is transparent and open to challenge, and recognises that a wide range of factors can affect the historic environment in different ways. Changes might support its long-term survival, impact on its current management or even give us new information to improve our understanding of it.

HEPS sets out a series of principles and policies for the recognition, care and sustainable

management of the historic environment. It promotes a way of understanding the value of the historic environment which is inclusive and recognises different views. It encourages consistent, integrated management and decision-making to support positive outcomes for the people of Scotland. It also supports everyone's participation in decisions that affect the historic environment.

By doing these things, HEPS helps to deliver the vision and aims of *Our Place in Time*. It takes into account principles that the UK and Scottish governments have agreed to in international charters and conventions on cultural heritage and landscape.

## HOW HAS HEPS BEEN DEVELOPED?

HEPS is for everyone who cares about decisions that affect the historic environment. This includes the people who make the decisions, as well as the people affected by or interested in them.

The policy has been developed using current research as well as established views about how to care for the historic environment. It also draws upon previous policy documents and related policy areas that affect or are affected by the historic environment.

HEPS has also been informed by work undertaken by HES to understand what the historic environment means to the people of Scotland. HES did this by listening to people's views on how to look after and manage the historic environment. These conversations have shaped this policy document.

## POLICIES FOR MANAGING THE HISTORIC ENVIRONMENT

### HEP1

Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.

### HEP2

Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.

### HEP3

Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

### HEP4

Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

### HEP5

Decisions affecting the historic environment should contribute to the sustainable development of communities and places.

### HEP6

Decisions affecting the historic environment should be informed by an inclusive understanding of the potential consequences for people and communities. Decision-making processes should be collaborative, open, transparent and easy to understand.

# WHAT ARE THE CHALLENGES AND OPPORTUNITIES FOR THE HISTORIC ENVIRONMENT?

There are a number of challenges and opportunities that affect how we understand, manage and care for the historic environment.

Decision-making has to be sufficiently flexible and adaptable to deal with wide-ranging and ongoing changes in society and the environment.

Good decisions will aim to achieve the best possible outcome for the historic environment and maximise its benefits.

## LAND MANAGEMENT

Land management affects much of the historic environment. Changes to agricultural and land use policies and practice can have a significant impact.

## CREATING AND MAINTAINING PLACES

The changing places where we live, work and play, and the ways we understand and relate to them, are among the wide range of factors that affect our wellbeing. The historic environment plays a key part in making good places.

## DIVERSITY, EQUALITY AND ACCESS

Established ways of recognising and managing the historic environment haven't always reflected our whole society. It is important to talk about the past in a way that recognises its diversity. The historic environment should be accessible and inclusive, providing a source of inspiration, enjoyment and learning for all.

## ROLES AND RESPONSIBILITIES

Taking care of the historic environment is a shared responsibility. Sometimes the interests of different groups and individuals overlap, and this can cause confusion and tension about roles and responsibilities.

## FUNDING

Some historic places and sites will rely on external funding. There are difficult choices to be made about where to spend available money, and opportunities to think creatively about approaches to funding.

## SUSTAINABLE TOURISM

Tourism brings huge benefits to the wider economy and can provide financial resources for looking after historic sites and buildings. High visitor numbers can also affect the sites themselves, sometimes creating management challenges.

## CLIMATE CHANGE

Climate change and the effort required to mitigate and adapt to its effects have a significant impact on the historic environment. We are still working as a society to understand this impact.

## SOCIETAL CHANGE

Our communities and lifestyles are changing; our population is ageing and shifting. This can have an impact on the historic environment, changing how we interact with it and value it.

## INTANGIBLE CULTURAL HERITAGE

Established ways of managing the historic environment are often based around physical structures such as buildings and monuments – but the historic environment is made up of both intangible and tangible cultural elements.

## A HOLISTIC APPROACH TO THE ENVIRONMENT

All of our landscapes – rural and urban – are part of the historic environment. Established ways of managing them don't always recognise that natural and cultural benefits and outcomes are often interdependent.

## ECONOMIC CHANGE

Changes to the economy, whether positive or negative, have an impact on the historic environment and how it is looked after and managed. The historic environment contributes to our economy and can be a source of sustainable growth.

## COMMUNITY PARTICIPATION AND EMPOWERMENT

Decisions about the historic environment have an impact on people and communities. Empowering communities and broadening participation improves outcomes for people and for the historic environment.

## REGULATORY CHANGE

Changes to a wide range of laws and regulations can affect the management of the historic environment. It can be hard to predict and fully understand the impact of these changes.

## SKILLS AND CAPACITY

Good management relies on decision-makers having access to the right skills, expertise and capacity to look after the historic environment and make informed decisions.

# CHALLENGES AND OPPORTUNITIES

# POLICIES AND PRINCIPLES

The following policies and core principles set out HES's understanding of how the historic environment should be managed and how to apply these principles.

The principles in this document are the fundamental ideas that underpin desirable and positive outcomes for the historic environment. These principles are the basis for the policies outlined here. The policies describe how the principles should be implemented.



# UNDERSTANDING AND RECOGNITION: POLICIES AND PRINCIPLES

## Policy on understanding and recognition

### HEP1

Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.

## Core principles on understanding and recognition

- **Recognising the cultural significance of sites and places supports good decision-making.**
- **A place must be understood in order for its cultural significance to be identified.**
- **A wide range of factors contribute to cultural significance.**
- **Knowledge and information about the historic environment is critical to our understanding of our past, present and future.**
- **The historic environment changes over time, and so does how it is understood and appreciated.**
- **Research, discussion and exchange of ideas can all contribute to our understanding of the historic environment.**
- **Understanding will improve when information is made widely available and everyone has the opportunity to contribute to knowledge of the historic environment.**

## How these principles are applied

People have created the character, diversity and distinctiveness of the historic environment over time. It is fundamental to people's sense of belonging; it provides tangible links with the past, helps to define who we are, and shapes our lives today. The qualities an asset or place has and expresses may be rare, finite and vulnerable to change. Sometimes the value of a place becomes apparent only through the process of change.

Decisions affecting the historic environment should be based on careful consideration of cultural significance. This helps to ensure that the historic environment can be appreciated today and passed on with confidence for the future.

To understand a place's cultural significance, we have to understand the place itself. This involves thinking about its physical and material elements – how much of it has survived or how much of it has changed through time, as well as its wider context and setting. Elements of places which may not have a physical presence but which contribute to cultural significance need to be recognised. These intangible qualities include the knowledge and associations people have with a particular place; they might involve elements such as language and poetry, stories and song, and skills and traditions.

Different individuals and groups of people value places in different ways. Understanding this helps us to understand the cultural significance of places for past, present and future generations. Recognising why places are culturally significant helps to fulfil a range of social, environmental and economic needs.

Access to as much information and knowledge as possible is essential for understanding cultural significance. This knowledge should be shared. An inclusive approach takes account of different ways of looking at things and valuing them, and diverse interpretations of our past and heritage.

As a society, we recognise value in many different ways: in records in archives, pieces in museum collections or the legal protection given to some of our most valued historic places. Many other ways of recognising value are part of our everyday lives. We share local knowledge, cultural practices, the language we use and the stories we tell. The diversity of Scotland's rich cultural heritage should be celebrated in all its forms. People should have the opportunity to contribute to our understanding, and influence decision-making for the historic environment.

## MANAGING CHANGE: POLICIES AND PRINCIPLES

### Policies on managing change

#### HEP2

Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.

#### HEP3

Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

#### HEP4

Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

### Core principles on managing change

- **Some change is inevitable.**
- **Change can be necessary for places to thrive.**
- **Caring for the historic environment benefits everyone, now and in the future.**
- **Good decisions take a long-term view.**
- **Good decisions reflect an understanding of the wider environment.**
- **Good decisions are well-informed, transparent, robust, consistent and proportionate.**
- **Good decisions make sure that nothing is lost without considering its value first and exploring options for avoiding its loss.**
- **To manage the historic environment in a sustainable way, its cultural significance and the cultural significance of elements within it have to be understood.**

## How these principles are applied

The historic environment enhances our quality of life and is a hugely valuable social, cultural, economic and environmental resource. It is finite and much of it can't be replaced. Good management maintains the quality of this resource and secures its benefits, making sure that nothing is lost without considering its value and exploring options for avoiding its loss.

Cultural significance should be considered in order to manage change through national and local policies as well as other land use management systems. If a place has cultural significance or has the potential for important new discoveries, decision-makers need to consider this when making decisions. In the planning system, this is called a 'material consideration'.

When decisions are made that affect places of cultural significance, the focus should be on avoiding or minimising adverse impact. Wherever possible, special characteristics and qualities should be protected, conserved or enhanced. Lots of actions can contribute to this, including:

- conservation
- effective maintenance
- restoration and conversion
- land management
- sensitive use of materials
- building techniques and high-quality new design
- creative and informed approaches to new development
- robust and proportionate regulation

These principles apply to the whole of the historic environment. In some cases, sites are given legal protection through formal designations, which can bring more formal obligations. In the case of listed buildings, scheduled monuments and conservation areas, consent is required for many works.

Understanding the development of the environment through time helps to inform management decisions. It offers a longer-term perspective on issues affecting the historic environment – issues like the effect of past climate change and land management. The historic environment has to be managed in a sustainable way so that it can be understood and appreciated, and so that it can benefit present and future generations.

Before decisions are made, their impact should be understood. If there is no way of being confident about what the impact of an action will be, the only way to be certain that there will be no damage is to avoid the action. This is referred to as the precautionary principle.

Sometimes the best actions for the historic environment will not be the best actions for other interests. There will be occasions where decision-makers need to manage conflicting needs. Potential conflicts should be identified and reduced as much as possible.

When decision-makers are considering potential changes, whether as a result of a development proposal or arising from environmental processes, they should use this general approach:

### Understand the historic environment

- Understand and analyse the historic environment, context, asset or place.
- Understand the cultural significance of any affected assets or places.

### Understand the background for the change

- Identify and understand the nature of and reasons for the change.

### Understand the likely impact of proposed actions or decisions

- Assess and predict the likely level of the impact of proposals on the historic environment, context, asset or place.
- Make the level of impact clear so that it can inform decision-making.

### Making decisions about impact

- Avoid negative impact where possible.
- Minimise any impact that cannot be avoided.
- Keep intervention to a minimum.
- Ensure changes to a site or place are proportionate to its cultural significance.
- Consider less detrimental alternatives if they can deliver the same objectives.
- Identify opportunities for mitigation throughout, and as early as possible.
- Identify opportunities for furthering our knowledge and understanding where possible.

### Monitoring

- Put monitoring measures in place to make sure that any mitigation has been implemented.
- Make sure measures are in place to identify any unforeseen or unintended consequences.
- Monitor the outcome and impact of the decision to provide a sound knowledge base for future policy and decision-making.

## WORKING TOGETHER: POLICIES AND PRINCIPLES

### Policies on working together

#### HEP5

Decisions affecting the historic environment should contribute to the sustainable development of communities and places.

#### HEP6

Decisions affecting the historic environment should be informed by an inclusive understanding of the potential consequences for people and communities. Decision-making processes should be collaborative, open, transparent and easy to understand.

### Core principles on working together

- **Everyone has a stake in the historic environment and how it is looked after.**
- **Effective management is a collective effort.**
- **Effective management takes wider interests into account.**
- **Good management empowers and involves communities.**
- **Early dialogue and close collaboration lead to better outcomes.**

### How these principles are applied

Changes to our society, climate and economy create significant challenges for the historic environment. Resources need to be managed sustainably to balance competing demands. The different ways communities and individuals place value on the historic environment should be recognised.

Effective management of the historic environment is a shared endeavour involving individuals and organisations who own, use, manage or care about heritage. People should be empowered to use their heritage to develop their communities and places in a sustainable way. We all need to work collaboratively to respond to the challenges and opportunities we are facing, to make sure the outcome is as fair as possible.

When making decisions about the historic environment, different interests need to be taken into account. Decision-makers need to consider the consequences of decisions for a range of people. In doing this, tensions and conflicts can arise. Interrelationships and areas of common ground should be identified to encourage dialogue and collaboration, rather than focusing on competing views.

## DELIVERY AND MONITORING

Good decision-making balances current circumstances with long-term aspirations. This is central to the sustainable management of the historic environment. It is a collective responsibility to ensure that we are all striking that balance.

Decision-makers should understand and monitor decisions affecting the historic environment to learn from experience and to improve future decisions. Historic Environment Scotland will monitor this policy in collaboration with other interested parties over a ten-year period until 2029.



## SOURCES OF FURTHER INFORMATION AND GUIDANCE

### Strategy, policy and procedure

Our Place in Time:  
The Historic Environment  
Strategy for Scotland

Historic Environment Scotland:  
Designation Policy and  
Selection Guidance  
<https://www.historicenvironment.scot/designation-policy>

Designations application from  
[historicenvironment.scot/designation-application](http://historicenvironment.scot/designation-application)

Historic Environment Scotland:  
Scheduled Monument  
Consents Policy  
<https://www.historicenvironment.scot/smc-policy>

Historic Environment Circular 1:  
Process and Procedures  
<https://www.historicenvironment.scot/circular>

Scotland's Archaeology Strategy  
<http://archaeologystategy.scot>

### Guidance

Managing Change in the Historic  
Environment guidance series

Managing Change Demolition of  
Listed Buildings  
<https://www.historicenvironment.scot/demolition>

Managing Change Use and  
Adaptation of Listed Buildings  
<https://www.historicenvironment.scot/use-and-adaptation>

HES case studies  
<https://www.historicenvironment.scot/adaptation-case-studies>

HES Technical advice notes  
(TANs), Short Guides, Inform  
Guides, and Practitioners Guides  
<https://www.historicenvironment.scot/archives-and-research/publications>

Scottish Government Planning  
Advice Note (PAN) 2/2011:  
Planning and Archaeology  
[www.gov.scot/publications/pan-2-2011-planning-archaeology](http://www.gov.scot/publications/pan-2-2011-planning-archaeology)

Scottish Government Planning  
Advice Note (PAN) 71:  
Conservation Area Management  
[www.gov.scot/publications/conservation-management-planning-advice](http://www.gov.scot/publications/conservation-management-planning-advice)

### Online resources

Historic Environment  
Scotland website -  
[www.historicenvironment.scot/advice-and-support](http://www.historicenvironment.scot/advice-and-support)

Designation records  
and decisions -  
[www.portal.historicenvironment.scot](http://www.portal.historicenvironment.scot)

Canmore: National Record  
of the Historic Environment  
[www.canmore.org.uk](http://www.canmore.org.uk)





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## **9. HISTORIC ENVIRONMENT SCOTLAND - MANAGING CHANGE IN THE HISTORIC ENVIRONMENT GUIDANCE NOTE SERIES**



# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT PROCEDURAL ADVICE

SCHEDULED MONUMENT CONSENT FOR ARCHAEOLOGICAL  
EXCAVATION: GUIDANCE ON HISTORIC ENVIRONMENT  
SCOTLAND'S ASSESSMENT OF APPLICATIONS



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

UPDATED MARCH 2021



Excavations at Clachtoll Broch – a community project led by Historic Assynt and assisted by a commercial archaeology company. Excavation of the interior of the broch was required to allow conservation works to stabilise its massive outer walls, so that the monument could be preserved for the foreseeable future. Although the impetus for the excavation was ongoing conservation works, the research strategy was designed to address important national research questions and reach the highest standards of archaeological fieldwork, ensuring the maximum level of information was recovered.

Front cover and image below  
© AOC Archaeology Group



# 'MANAGING CHANGE' IS A SERIES OF NON-STATUTORY GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. THEY EXPLAIN HOW TO APPLY GOVERNMENT POLICIES.

THE AIM OF THE SERIES IS TO IDENTIFY THE MAIN ISSUES WHICH CAN ARISE IN DIFFERENT SITUATIONS, TO ADVISE HOW BEST TO DEAL WITH THESE, AND TO OFFER FURTHER SOURCES OF INFORMATION. THEY ARE ALSO INTENDED TO INFORM PLANNING POLICIES AND THE DETERMINATION OF APPLICATIONS RELATING TO THE HISTORIC ENVIRONMENT.

## INTRODUCTION

This note provides guidance for anyone considering undertaking archaeological excavation on a scheduled monument when the primary reason is for research purposes – that is, it concerns excavation which is not prompted by conservation or other factors. It provides information on the process and timescales for applications for scheduled monument consent (SMC) for archaeological excavation and explains how Historic Environment Scotland (HES) applies this policy when evaluating applications, thereby providing transparency in the decisionmaking process.

While this is not its primary function, the document might also be helpful as ‘best practice’ more generally.

## KEY ISSUES

1. There are over 8000 scheduled monuments in Scotland, which are recognised as being of national importance and are legally protected to ensure they are preserved for future generations.

2. Archaeological excavation on a scheduled monument requires SMC. HES is responsible for determining applications for SMC, unless Scottish Ministers direct that the application is called-in for their own determination.

3. The benefit to be gained from archaeological excavation needs to be balanced against the presumption in favour of preservation of this nationally-important and finite archaeological resource. Archaeological excavation at a scheduled monument needs to be justified as representing the public interest.

4. SMC will only be granted where an applicant demonstrates that their proposals are based on sound research aims and employ the highest standards of excavation methodology and recording, that excavation and recording are undertaken by suitably skilled personnel, that the project is adequately resourced; and that impacts are justified and minimised, and provide long term public benefit.

## 1. PROCESS

### 1.1 GENERAL

The scheduled monument consent process is described in [Historic Environment Circular](#). Further information on the SMC application process, right of appeal, publication of applications and compliance can be found in the leaflet [Managing Change in the Historic Environment: Works on Scheduled Monuments](#).

For departments and agencies of the Scottish and UK Governments undertaking works to monuments in Scotland there is a parallel system known as scheduled monument clearance. This is governed by the same principles and procedures as the SMC process and the guidance within this document applies equally to these applications.

### 1.2 PRE-APPLICATION DISCUSSION

The decision to seek SMC for archaeological excavation of a scheduled monument should be made only following careful consideration of the factors outlined in this document.

To assist potential applicants or inquirers, and to help avoid unforeseen issues arising, HES offers a free pre-application advice service. It is strongly recommended that anyone considering applying for SMC takes advantage of this service.

### 1.3 APPLICATION

Applications are made by completing an application form which can be downloaded from [Historic Environment Scotland's website](#) or requested from Historic Environment Scotland at the address at the end of this document. Applications can be submitted electronically, or by post. There is no charge to make an application for SMC.

Applications for archaeological excavation on a scheduled monument should be accompanied by a detailed research strategy which clearly sets out the questions the proposed excavation hopes to address.

Applications should include a clear description of the works proposed, how the interventions have been targeted, excavation methodology, recording, reporting, proposed postexcavation research design and publication, resources and the skills of those who will be undertaking the excavation and reporting.

Where metal detecting or geophysical survey is proposed as part of the project, a separate application for [Metal and Mineral Detecting Consent](#) is not required.



## 1.4 TIMESCALE & NOTIFICATION OF APPLICATIONS TO SCOTTISH MINISTERS

Applications for archaeological excavation on scheduled monuments may be notified to Scottish Ministers.

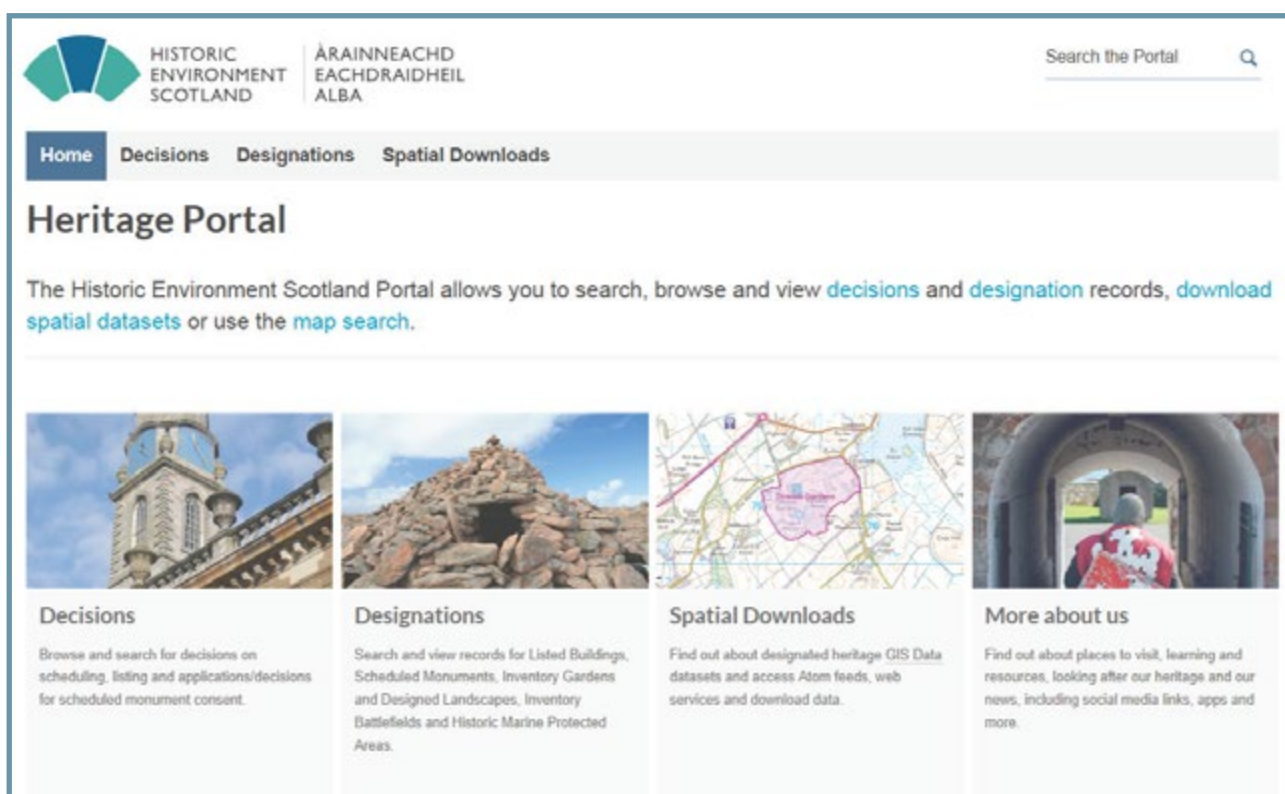
This is because HES is required to notify any application to Scottish Ministers where proposed works would allow a greater level of intervention than the minimum level of intervention that is consistent with conserving what is culturally significant in the monument. This aspect is set out in [The Scheduled Monument Consent \(Notification of Applications\) Direction 2015](#).

Where applications are notified it will normally take 12 weeks to reach a decision – and this will apply in the case of most excavations whose sole reason is research.

## 1.5 PUBLISHING APPLICATIONS

All SMC applications are published on the [HES portal](#), together with a Report of Handling which details HES's assessment of the application and basis for decision.

All SMC applications and decision documents are published on the Historic Environment Scotland Heritage Portal. You can search for previous and current applications, decisions, and reports of handling using key words such as 'excavation' or the name of the monument.



The screenshot shows the Historic Environment Scotland Heritage Portal. At the top, there is a logo for Historic Environment Scotland and its Scottish Gaelic name, 'ÀRAINNEACHD EACHDRAIDHEIL ALBA'. A search bar is located in the top right corner. Below the logo, a navigation menu includes 'Home', 'Decisions', 'Designations', and 'Spatial Downloads'. The main heading is 'Heritage Portal'. A descriptive paragraph states: 'The Historic Environment Scotland Portal allows you to search, browse and view [decisions](#) and [designation](#) records, [download spatial datasets](#) or use the [map search](#).' Below this, there are four featured sections, each with a representative image and a brief description: 'Decisions' (image of a historic building), 'Designations' (image of a stone ruin), 'Spatial Downloads' (image of a map), and 'More about us' (image of a person in a red and white costume).


**HISTORIC ENVIRONMENT SCOTLAND** ÀRAINNEACHD EACHDRAIDHEIL ALBA

Search the Portal

Home Decisions Designations Spatial Downloads


## Heritage Portal

The Historic Environment Scotland Portal allows you to search, browse and view [decisions](#) and [designation](#) records, [download spatial datasets](#) or use the [map search](#).




### Decisions

Browse and search for decisions on scheduling, listing and applications/decisions for scheduled monument consent.




### Designations

Search and view records for Listed Buildings, Scheduled Monuments, Inventory Gardens and Designed Landscapes, Inventory Battlefields and Historic Marine Protected Areas.



### Spatial Downloads

Find out about designated heritage GIS Data datasets and access Atom feeds, web services and download data.



### More about us

Find out about places to visit, learning and resources, looking after our heritage and our news, including social media links, apps and more.



## 2. BACKGROUND

### 1.6 RIGHT OF APPEAL

Where an application for SMC has been determined by HES, all applicants have a right of appeal to Scottish Ministers against refusal (or part refusal) of an application, and against conditions attached to scheduled monument consent granted. Applicants may also appeal against non-determination of their application by HES. [The Scheduled Monument \(Appeals\) \(Scotland\) Regulations 2015](#) set out appeal procedures in more detail.

### 2.1 VISION

The government's vision for the historic environment is set out in [Our Place in Time \('OPIT'\)](#). This states that "Scotland's historic environment is understood and valued, cared for and protected, enjoyed and enhanced. It is at the heart of a flourishing and sustainable Scotland and will be passed on with pride to benefit future generations."

### 2.2 POLICY

[Scottish Planning Policy \('SPP'\)](#) sets out how nationally important land use planning matters should be addressed across the country. This is scheduled to be superseded by National Planning Framework 4 (NPF4) around spring 2022.

The [Historic Environment Policy for Scotland \(2019\)](#) (HEPS) sets out overarching principles for decision making that affects the Historic Environment.

The [Scheduled Monument Consents Policy](#) sets out in detail the policy framework against which all SMC applications, including those for archaeological excavations, will be assessed by HES. Where an application for SMC has been determined by HES.

## 2.3 SCHEDULED MONUMENTS POLICY

A monument is included in the schedule to secure its long term protection in the national interest, in situ and as far as possible in the form it has come down to us.



Works on scheduled monuments should normally be the minimum level of intervention that is consistent with conserving what is culturally significant in a monument.

*Scheduled Monument Consent Policy Aim*

The starting point for any project considering works to a scheduled monument, whether conservation or research-led, must be a thorough understanding of the cultural significance of the monument and its national importance. Guidance on how HES assesses cultural significance can be found in [The Designations Policy and Selection Guidance](#).

The next stage is to understand the impacts that any intervention at a scheduled monument would have on that particular monument's cultural significance.

In considering SMC applications, HES will look for evidence that an applicant has a clear understanding of the cultural significance of the monument, and the impact of the proposed works on this.

Any proposed works on a scheduled monument should be designed to minimise the impact on the monument's cultural significance and to retain its national importance.

## 2.4 SCHEDULED MONUMENT POLICY

### IN RELATION TO ARCHAEOLOGICAL EXCAVATION

#### 2.4.1 General

The primary purpose of scheduling is to ensure that nationally-important monuments are preserved for future generations. 'Detrimental' intervention should only be permitted where the impacts will result in nationally important benefits, are carefully considered, and properly mitigated.

Whilst archaeological excavation can release important information preserved in monuments, it also results in the irreversible loss of material relating to Scotland's past. It is because of that irreversible loss that HES takes – and asks others to take – a very careful approach when considering proposals for excavation on scheduled monuments.



Extensive intervention to a scheduled monument will only be allowed where:

- It has minimal effect on the cultural significance of the monument; or
- It is clearly necessary to secure the long-term preservation of the monument; or
- It will clearly generate public benefits of national importance which outweigh the impact on the nationally important cultural significance of the monument. Such public benefits could come from, for example, interventions which improve public access to a scheduled monument (where appropriate), or assist public understanding once the works are completed, or provide economic benefits of national importance once completed.
- Where unavoidable circumstances, such as coastal erosion, threaten the survival of a scheduled monument, it should, where possible, be excavated and/or recorded in detail before its destruction.

*Scheduled Monument Consent Policy 3*

Evidence for activity and settlement from the Early Neolithic, Late Neolithic, Bronze Age and Iron Age was found during excavations of a crop mark feature at Millhaugh, Perth and Kinross. One pit was packed with pottery, containing a remarkable amount of Early Neolithic sherds (both carinated and lug bowls) deposited with a fire-cracked saddle quern within a matrix of hearth material.





#### 2.4.2 Excavation in advance of an imminent threat to the monument

The Scheduled Monument Consents Policy makes specific provision for the excavation and recording of scheduled monuments under imminent threat of destruction. In circumstances where unavoidable loss can be demonstrated, such as coastal erosion or other environmental threats, excavation and recording is fully supported, subject to appropriate resourcing and investigative schemes.

#### 2.4.3 Excavation to secure the long term preservation of the monument

Archaeological excavation may occasionally be required for conservation reasons. This may, for example, include excavations -to investigate structural instabilities in a monument, or to allow repair and conservation work to take place. Such works should be limited to the minimum necessary to enable the intended repair to be effective, or inform repair and management strategies.







Conservation and research works should always be aimed at the lowest level of intervention that is consistent with achieving a monument's preservation.

Monuments are subject to decay and the threat of destruction from natural and human causes.

Conservation work may be needed to prolong the life of a monument, but there is a risk that this can be so invasive that it irreversibly modifies the monument's cultural significance and affects the features that made the monument important in the first place.

These might include its character, value, evidence for construction and use, or any other factor that contributes to a monument's cultural significance.

Research projects can deliver important public benefits, improving understanding of our most important monuments. However, they can also affect a monument's cultural significance and result in irreversible loss of information for future generations.

Research project works should therefore be carefully considered to ensure they are fully justified and any impact is minimised. They should be well targeted, properly researched and undertaken to high professional standards.

*Scheduled Monument Policy 2*

## 2.4.4 Excavation to secure other public benefits of national importance

There are a number of circumstances in which extensive interventions such as archaeological excavation on a scheduled monument may secure other public benefits of national importance which outweigh the national importance of that particular monument, meaning that the impact on the monument is outweighed by resultant wider benefits.

Research excavations on scheduled monuments can fall into this category. Interventions will be justified where the results will answer nationally important research questions and thus contribute to Scotland's national story. In addition to these benefits, an excavation can provide significant local community benefits, by fostering a sense of place, community engagement and ownership.

Excavation of Neolithic structures under imminent threat of coastal erosion at the Links of Noltland, Westray





### 3. APPLYING FOR SCHEDULED MONUMENT CONSENT FOR RESEARCH EXCAVATION



Proposals for change should be carefully considered, based on good authority, sensitively designed, and properly planned and executed. The level of information provided should be in proportion to the sensitivity of the monument or feature and the level of change proposed.

For all applications where change is proposed, the following factors will be taken into account when considering if works meet this policy:

f) that an appropriate level of record is made before, during and after any work and deposited in local and national archives, and, where appropriate, published;

h) that any archaeological excavation or other intrusive investigation should be based upon a detailed research strategy, with adequate resources, using appropriately skilled and competent archaeologists with a satisfactory record of the completion, archiving and publication of projects; and

i) that the design, planning and execution of works on scheduled monuments are undertaken by people with appropriate professional and craft qualifications, skills and experience.

*Scheduled Monument Consent Policy 4 (para f, h, i)*

#### 3.1 GENERAL

This section provides specific advice for anyone considering applying for SMC to conduct a research excavation on a scheduled monument. Whilst the advice is targeted towards research excavation, much will also be relevant to excavation for other purposes as outlined above.

#### 3.2 RESEARCH STRATEGY

Any application for archaeological excavation should be accompanied by a detailed research strategy, or project design, which clearly demonstrates the benefits of national importance that the project aims to deliver.

The research strategy should lay out the project aims clearly. The research question(s), and the anticipated answer(s), must be shown to be of national significance. It may be helpful, for example, to outline where the question(s) might align with the

Scottish Archaeological Framework (ScARF) or other developing or regional research initiatives. It will be important to include information on how your research will be disseminated, and how it might inform future decision making and be shared with the public and local communities.

Applications for excavation of a scheduled monument should align where possible with the aims of Scotland's Archaeology Strategy.

The significance and importance of the project, and of the contribution it will make to enhancing knowledge or understanding of Scotland's past should be explained. The extent to which other or current research conducted in this area/ period/ topic/ monument-type has been considered should also be discussed in relation to how it has informed your research strategy, and the added benefits you hope to achieve.

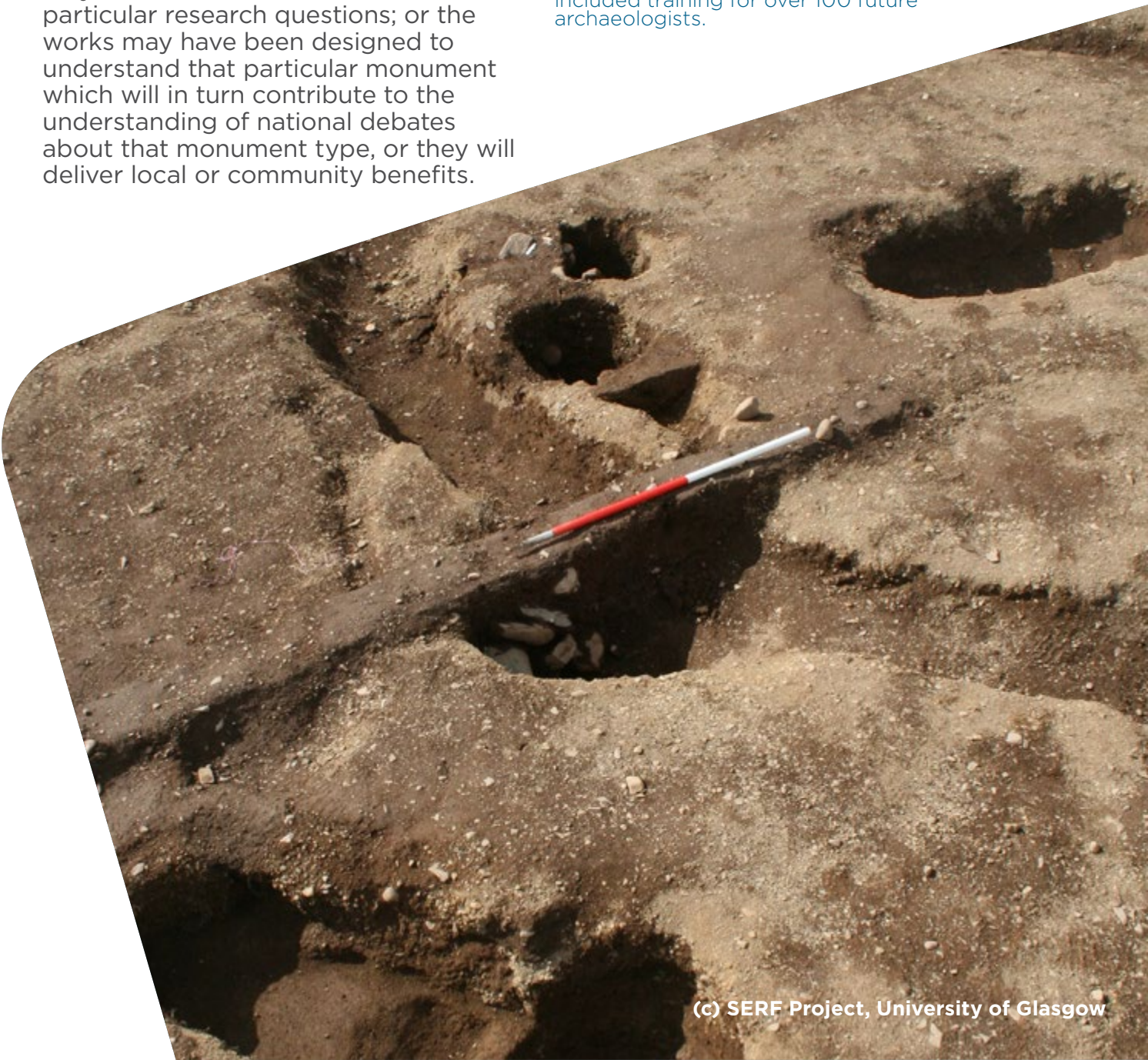
It should be clear why specific interventions have been recommended, and how they align with and seek to answer the research aims.

Excavation trenches should be targeted to gain the maximum amount of relevant information through minimal intervention.

The reasons for selecting the specific monument at issue should also be clear. For example, this might be the only monument that can answer those particular research questions; or the works may have been designed to understand that particular monument which will in turn contribute to the understanding of national debates about that monument type, or they will deliver local or community benefits.

### **The Strathearn Environs and Royal Forteviot (SERF) Project**

Research excavations on a number of scheduled monuments in Perth and Kinross, including the circular barrow below, provided a significant body of information on the archaeology of Forteviot and its environs that is already contributing to knowledge-generation and meeting strategic research aims across Scotland. Public benefits included training for over 100 future archaeologists.





### 3.3 DESCRIPTION OF WORKS

#### 3.3.1 General

In order to make an assessment of the impact of the proposed works, HES requires a clear description of all proposed works, including an accurate and detailed trench location plan, excavation methodology, recording, sampling strategies and details of proposed post-excavation analysis, archiving, and publication. A timetable, incorporating 'milestones' where appropriate, should be presented showing how the project's aims and objectives will be achieved within the proposed timescale. All should follow current industry standards as a minimum basis and should be clearly referenced (see advice on industry standards under '**Further Information and Advice**' below).

#### 3.3.2 Skills, experience and supervision

Excavation on nationally-important scheduled monuments should only be undertaken by appropriately-skilled personnel, appropriate for delivering the research aims, excavation, sampling, recording and reporting strategies. Any application should set out the skills and previous experience of the people leading, supervising and participating in the excavations. Lead investigators/applicants must demonstrate a track record of successful excavations, reporting and publication.

Where unskilled volunteers or students will form part of the workforce, the





proposals should demonstrate that suitable controls, such as an adequate level of supervision/ training, are in place to ensure industry standards are maintained.

### 3.3.3 Excavation and Sampling

The proposed area, and depths of excavation, should be proportional to the project research aims; and it should be made clear why its size and location has been chosen, in addition to the level and scale of sampling and dating strategies.

Where there are areas of uncertainty in the size, depth and location of

trench required, or sampling methodologies to be employed, these should be fully explored, with minimum and maximum levels of intervention set out. Applications will be assessed on the basis of the maximum level of intervention, but conditioned to ensure only the minimum necessary is undertaken in practice. It is not possible to make material changes to an application (e.g. significant addition or enlargement of trenches) once the application has been determined. A new application will be required for any material changes.





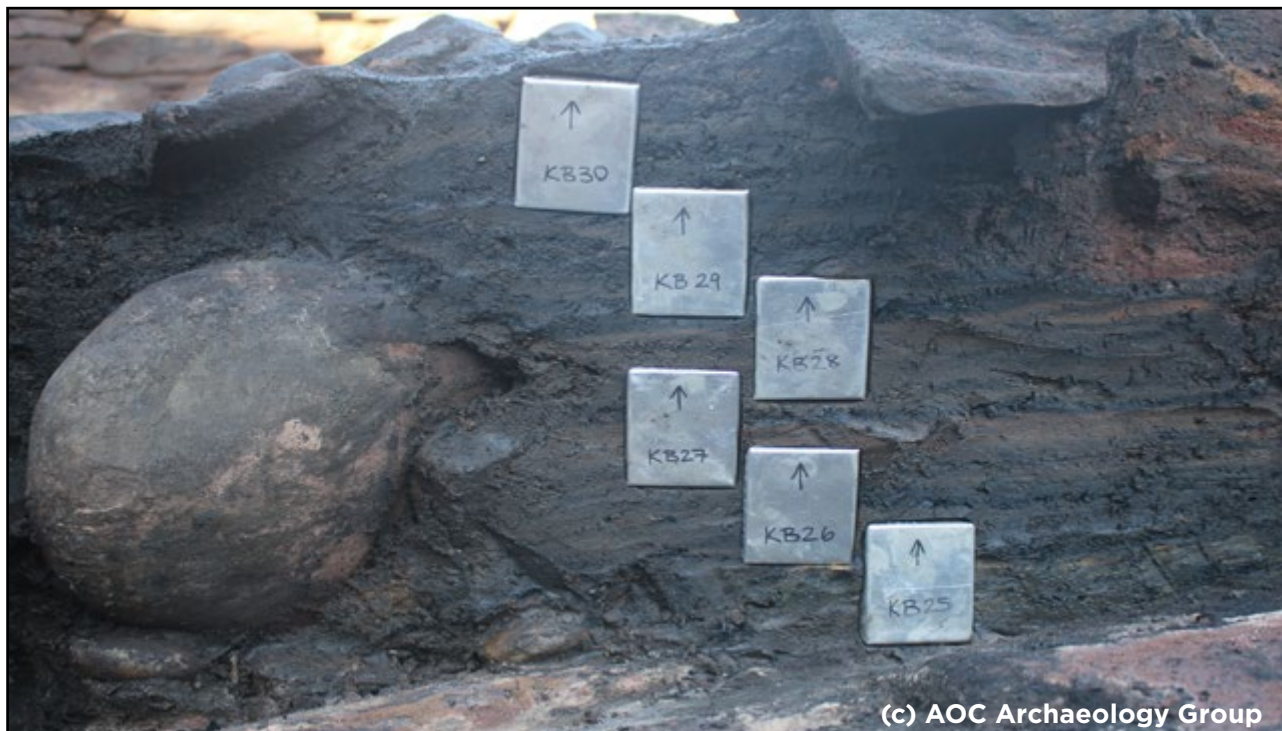
### 3.3.4 Reinstatement or post-excavation site management strategy

HES will assess the longer term impact of any proposed excavation on the management of the monument by assessing plans for post-excavation consolidation and/or reinstatement.

A reinstatement strategy should consider monitoring of reinstated trenches and make provision for further stabilisation works, should they be required. Where reinstatement is not proposed, a post-excavation site management strategy should address likely conservation issues and make provision for the sustainable management of the affected parts of the monument.

### 3.3.5 Post-excavation analysis, publication and archiving

HES will assess whether the post-excavation analysis, publication and archiving strategy is sufficient to meet industry standards. HES will look for evidence that any sampling and post-excavation strategy sets out an appropriate strategy for handling environmental sampling, artefacts, and faunal material both during and after the excavation. Artefacts recovered should be processed according to industry standards and sent to appropriate specialists for reports, any initial conservation, and interim storage.



(c) AOC Archaeology Group

Environmental sampling strategies are an integral part of any SMC application for research excavation. Strategies should be clearly set out, with any areas of uncertainty, such as sampling ratios or methodologies, fully explored. Sampling strategies have to be carefully designed before excavation and revised during it to ensure the maximum amount of information is extracted from the excavation process. The image shows sampling of successive hearth and floor surfaces within Clachtoll Broch.



A Data Structure Report (DSR) is always required and should normally be produced within 3 months of the completion of each season of excavation and sent to HES for comment. A copy of the finalised DSR should be sent to HES, the National Record of the Historic Environment, and the local Historic Environment Record. An Oasis data capture form should be completed and a Discovery and Excavation Scotland entry lodged. A Post-excavation research design (PERD) should be prepared. The DSR and PERD should make recommendations for post-excavation analysis, conservation of finds, and full reporting. Finds should be declared

through the Treasure Trove process. Upon completion of the project, the paper and digital archive should be prepared according to current best practice and deposited with the National Record of the Historic Environment.

### 3.4 RESOURCING

Any application for archaeological excavation on a scheduled monument should clearly demonstrate that adequate resources are in place, both financial and in terms of personnel. Resources should be proportionate to the level of excavation and anticipated post-excavation research proposed.

This image shows an Iron object recovered during excavations at Clach toll Broch. The scheduled monument consent process controls all aspects of work on a scheduled monument, including postexcavation research, conservation of finds, reporting and archiving. Applications must demonstrate an ability to record, conserve and report on important finds recovered as part of the excavation process.



## 4. DECISION MAKING PROCESS

HES aims to provide a clear and transparent decision-making process for SMC applications.

All decisions in relation to SMCs are published on the HES portal, together with a detailed Report of Handling which sets out the proposed works, their justification, and assessment against policy. Where conditions are applied, these will also be explained (also see section 1.6 Right to Appeal)

Where an application has been referred to Scottish Ministers under the Notification Direction, this will also be shown, together with Scottish Ministers' determination where relevant.

## 5. COMPLIANCE

Once granted SMC, there is a legal obligation upon the applicant to undertake works in the manner agreed. This includes delivery of their DSR, post-excavation analysis, and reporting within the agreed timescale. Failure to undertake works in the manner agreed, without prior written agreement from HES, may lead to enforcement action. Further information on HES's enforcement policy can be found on the [HES Website](#), and in the leaflet ['Compliance and Enforcement at Scheduled Monuments'](#).

Unexpected finds can significantly increase post-excavation costs. Resourcing must be adequate to ensure all necessary post-excavation work can be completed to the highest standard.



## 6. FURTHER INFORMATION AND ADVICE

Historic Environment Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of our roles is to provide advice about managing change in the historic environment.

### LEGISLATION

[The Ancient Monuments and Archaeological Areas Act 1979](#)

[The Historic Environment \(Amendment\) \(Scotland\) Act 2011](#)

[The Historic Environment Scotland Act 2014](#)

### POLICY AND STRATEGY

[The Historic Environment Policy for Scotland \(2019\) \(HEPS\)](#)

[The Scheduled Monument Consents Policy](#)

[Historic Environment Scotland Archaeology Programme: Open Access Procedure](#)

[Our Place in Time: The Historic Environment Strategy for Scotland](#)

[Scotland's Archaeology Strategy](#)

[Scottish Archaeological Research Framework](#)

### SCHEDULED MONUMENT CONSENT

[Scheduled Monument Consent Application Forms](#)

[Scheduled Monument Consent Decisions](#)

### INDUSTRY STANDARDS AND GUIDANCE

[Code of Practice for Treasure Trove in Scotland](#)

[Chartered Institute of Archaeologists Standards and Guidance](#)

[The Treatment of Human Remains in Archaeology](#)

[The Standard and Guide to Best Practice in Archaeological Archiving in Europe](#)



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
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ALBA

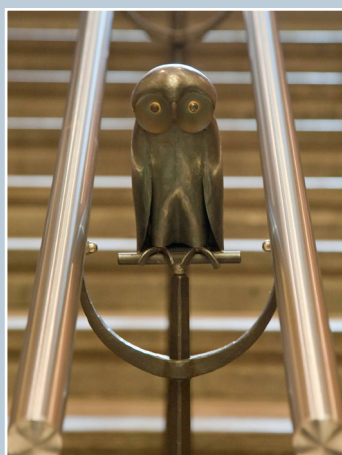
Historic Environment Scotland  
Longmore House, Salisbury Place  
Edinburgh EH9 1SH

0131 668 8600  
[historicenvironment.scot](http://historicenvironment.scot)

Historic Environment Scotland – Scottish Charity No. SC045925  
Registered Address: Longmore House, Salisbury Place, Edinburgh EH9 1SH



# Accessibility





# Key Issues

- 1. Scottish Ministers are committed to promoting equality of access to, and enjoyment of, the historic environment. This guidance is intended to encourage the provision of physical access for everyone in ways that also safeguard the character of historic buildings and places.**
- 2. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area. Scheduled monument consent is always required for works to scheduled monuments.**
- 3. Careful assessment and planning can allow consideration of access in the broader context of an understanding of a historic building or place and its long-term management requirements.**
- 4. It is particularly important to involve the users or potential users of historic buildings or places in planning access improvements.**
- 5. Where physical alterations are required, it is usually possible to achieve access improvements that are sensitive to the historic character of the building or place through high-quality design, management and maintenance.**
- 6. Planning authorities give advice on the requirement for listed building consent, planning and other permissions. Some local authorities have a dedicated Access Officer, who can advise on access issues.**

## 1. INTRODUCTION

- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to developments for improving physical access to the historic environment. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K).

## 2. BACKGROUND

- 2.1 Equality of access for all people is a fundamental aim of the Scottish Ministers' policy on the historic built environment ([SHEP](#)). The policy sets out an inclusive approach: people of all levels of physical, mental and sensory ability should have the opportunity to access, experience and enjoy the historic environment on an equal basis.
- 2.2 Access to the historic environment can be both physical and 'intellectual', in the sense of understanding, learning, researching and training. This guidance is primarily concerned with physical access. Further information on intellectual access is provided on Historic Scotland's website: [www.historic-scotland.gov.uk/index/accessibility](http://www.historic-scotland.gov.uk/index/accessibility)
- 2.3 Improved accessibility can have numerous benefits for the historic environment, in particular its contribution to the use and viability of historic buildings and places. With careful thought and planning, improved physical access to most elements of the historic environment can usually be achieved through reasonable adjustments without harming the character and appearance of the historic building or place.
- 2.4 Ideally adjustments should seek to provide unassisted and dignified physical access for all.



*New steps and ramp at the Castle Street Annexe of the Sheriff Court in Aberdeen. High-quality contemporary design and materials provide improved access for all users of the building.*



*Virtual access is provided to Jedburgh Abbey, Scottish Borders, from within the visitor centre.*



*A lift has been added to the Titan Crane in Clydebank to allow everyone to access and enjoy it.*



*A courtesy vehicle is provided at Edinburgh Castle to enable ease of access to the upper levels of the complex.*



*Kirkcaldy, Fife. Ramped and stepped access was achieved in this busy pedestrian street by removing the original door and a window to create an internal lobby. Equality of access was achieved and the principal feature of the building's ground floor, the arcade of round-headed arches, was maintained.*

- 2.5 Successful improvements to accessibility are usually based on:
- an understanding of the needs of users;
  - an understanding of the character of the historic building or place and its significance;
  - an assessment of the various improvement options;
  - an access plan that takes account of the needs of users and the character and significance of the building/place;
  - high-quality design and materials;
  - appropriate maintenance and review of facilities.
- 2.6 In all cases the level of assessment of a historic building/place and planning for access improvements should be appropriate to its function, complexity and interest.

### 3. UNDERSTANDING THE NEEDS OF USERS

- 3.1 The needs of users vary according to individual levels of physical or sensory ability and the nature of the historic building or place and how it is used.
- 3.2 An access audit is a good way of assessing how a building or place is used and identifying any existing barriers to access. Barriers to access may exist in a physical form, or in the way that the building is used or managed. An access audit should examine not just the entrance to the building, but also approaches, routes through the building, facilities and services, and emergency provisions and exits.
- 3.3 It is recommended that access audits are undertaken in consultation with users and local access panels. The National Register of Access Consultants maintains a list of professional auditors and consultants with specialist expertise in assessing and improving access to historic buildings and places: [www.nrac.org.uk](http://www.nrac.org.uk).

### 4. UNDERSTANDING THE CHARACTER OF THE HISTORIC BUILDING OR PLACE AND ITS SIGNIFICANCE

- 4.1 The character and significance of a historic building or place can be derived from a number of factors, from how it is planned and designed to its materials and cultural associations. It is important to establish the significance of the building or place as a whole and also the relative significance of its component parts.
- 4.2 A structured way of considering the character and significance of a historic place is through the use of a conservation statement or plan. A conservation statement seeks to identify the cultural and historic significance of the site, whilst a conservation plan also includes a strategy for the management



and conservation of the site. Historic Scotland publishes [A Guide to the Preparation of Conservation Plans](#) (PDF 76K).

## 5. ASSESSMENT OF ACCESSIBILITY IMPROVEMENT OPTIONS

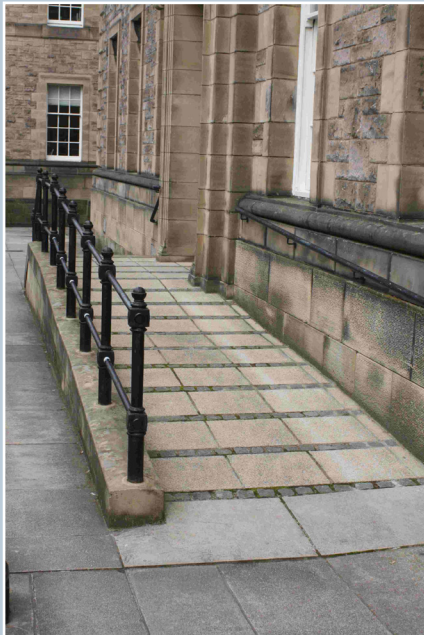
- 5.1 Having established the needs of users, the existing accessibility, and the character/significance of the historic building or place, the options for improvement can be considered in terms of management and physical alterations. In considering the options, the aim is to achieve the best practical balance between the access requirements of all users and the reasonable conservation needs of the building or place. Management options might consider how circulation and use of the historic building or place can be rearranged to achieve improved access for everyone without major physical alterations.
- 5.2 Where physical barriers to easy access are identified, the impact on the character of the historic building/place of removing or altering the physical feature should be assessed using the hierarchy of 'reasonable adjustments' for service providers set out in Section 21(2) of the Disability Discrimination Act (1995). Adjustments to consider include:
- **Remove the feature.** If the feature is not an important part of the character of the historic building/place, the most straightforward course of action is likely to be removal. It may be necessary to assess the contribution of a historic feature, such as a staircase or narrow doorway, to the interest of the building/place against the benefits and costs that removal might involve.
  - **Alter it so that it no longer has that effect.** Again the relative significance of the historic feature must be assessed before proposing alteration. In general additive rather than destructive alteration is likely to best protect the interest of the building/place. Where alteration is appropriate in principle, high-quality design and materials will help to integrate the new work with the historic fabric (see further design guidance below).
  - **Provide a reasonable means of avoiding the feature.** In cases where a historic feature forms a key part of a building or place's character and removal or alteration would be damaging, it may be possible to provide alternative access in another location. Through management and/or design it is preferable to ensure that the alternative access is used by everyone.
  - **Provide a reasonable alternative** method of making the service in question available to disabled persons. Where none of the above can be achieved as 'reasonable adjustments' and a service is provided from the building, alternative means of providing the service should be considered.



*The Assembly Rooms, George Street, Edinburgh, where the pavement level has been raised at the main entrance to eliminate a threshold.*



*This platform lift provides alternative access from the pavement to the side entrance of General Register House in Edinburgh.*



*Linlithgow County Buildings, West Lothian. Attention is drawn to this ramp by the use of a variety of textures, carefully designed to complement the character of the building. © West Lothian Council.*



*Buchanan Street, Glasgow, where a ramp constructed in a discreet location over the basement area enables easy access for all to this shop.*

## 6. HIGH-QUALITY DESIGN AND MATERIALS

### General

- 6.1 Alterations to access should normally be designed in a permanent manner, and where possible should allow independent movement for everyone to and within the historic building or place. Use of high-quality design and materials benefits all users and the long-term functioning of the building/place.
- 6.2 By considering people's diversity, 'inclusive design' seeks to provide an environment which addresses our varying needs. In this way it can break down barriers and remove exclusion. An inclusive approach to the design of access improvements is important to remove undue effort and separation, not just for wheelchair users. The Scottish Government's [Planning Advice Note 78: Inclusive Design](#) contains further useful guidance on making buildings and public spaces accessible.
- 6.3 It is recognised that full equality of access may not be achievable in every circumstance due to practical, technical, financial, conservation and/or other constraints. In these cases high-quality design and management must be used to accomplish the broadest possible degree of access within the constraints.
- 6.4 The symmetry of a historic building and the impact of access alterations on axial views that may be of townscape or landscape value are important considerations in designing improvements. The location and scale of a building and its setting may make relatively small adjustments to access possible without significant impact.
- 6.5 Special attention must be paid to designs affecting a repeated component of a larger group, such as a terrace of houses, and the incremental impact the alteration would have if used throughout the group. Where access improvements are planned to part of a building in multiple occupancy, consideration should be given to joint schemes for the whole building.
- 6.6 It may not be possible to meet the current Building Standards guidance in all cases, but usually a reasonable compromise can be achieved that will satisfy safety requirements, access improvements, and conservation needs. Some examples of good practice are illustrated in Part Two of Historic Scotland's *Guide to the Conversion of Traditional Buildings* (on the Scottish Building Standards website: [www.sbsa.gov.uk](http://www.sbsa.gov.uk)).
- 6.7 Very occasionally, temporary means of overcoming an obstacle might be appropriate, as an interim measure until a long-term solution is found. Reversibility must not be used to justify schemes that relate poorly to the building.



- 6.8 The following topical guidance is not comprehensive, but provides an overview of the most common issues.

### Approaches

- 6.9 Approaches to historic buildings from the street or from car parking, or routes to and within a historic site are essential to ensuring ease of access. Where historic surfaces present access difficulties in terms of finish, texture or colour, it is usually possible to adapt them sensitively using high-quality materials to create level slip-resistant surfaces in contrasting colour. For example access across setts and gravel drives/courts can be improved with carefully laid flagstone paths. Further detailed guidance is available in Historic Scotland's *Easy Access to Historic Landscapes* (2005) (from the Historic Scotland website).
- 6.10 Dedicated parking should be provided as close as is practical to the accessible entrance, with careful design of markings and signage to preserve the setting of the historic building.

### Steps

- 6.11 External steps often form an important part of the setting of a historic building, or even part of the design of the building itself, particularly of classical buildings. It is normally desirable to retain as much of the character and historic fabric of the steps and associated railings as possible, but carefully designed access improvements are often achievable with minimal impact.
- 6.12 In many cases the addition of correctly positioned handrails of comfortable gripping profile can be of assistance to a significant number of users. In some circumstances it may be appropriate to match existing iron or timberwork details, but in some locations more contemporary designs may be preferable.
- 6.13 Where level access is required, there are several methods that can be considered. Depending on the number of steps, the available space, and the significance of the existing arrangement, it may be possible to provide carefully designed ramped access. For small changes in level this can sometimes be achieved by regrading of pavements or by creation of a short ramp to the side of, or over, the existing steps.
- 6.14 Larger or steeper changes in level require either a longer ramp or some form of mechanical fixture, such as a platform lift. In general such additions will need to be carefully designed and sited to take into account the character of the historic building.
- 6.15 The equipment and fixings required for external stair lifts can have a substantial visual impact, and should only be considered where less obtrusive measures cannot be accommodated.
- 6.16 In particularly sensitive sites, it might be necessary to consider the archaeological implications of the groundwork needed for mechanical plant or ramp construction (see 'Archaeology' below).



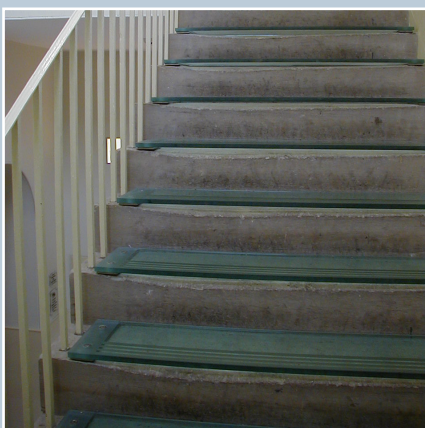
*The need for user assistance, regular mechanical maintenance and obtrusive fixtures limits the suitability of external stair lifts in many locations.*



*The Hunterian Museum, Glasgow University, completed circa 1870 to designs by Sir George Gilbert Scott. A contemporary glazed lift has been inserted to enable access to the upper gallery of the main exhibition space.*



*The door into Linlithgow's County Buildings opens automatically, and also has a manually operated push pad. © West Lothian Council.*



*Glass treads with a textured finish are laid over the worn stone stairs in the Old School building at New Lanark. The wear on the treads is part of the significance of the school because it records many years of use by the children.*

- 6.17 For various reasons, including the special historic interest of steps and stepped entrances, some cases may require the consideration of alternative locations for the provision of level access. Such alternative access points should where possible be managed to form a route for use by everyone.

### Doorways and doors

- 6.18 Where a doorway forms a significant part of the character of a historic building, and is narrower than current standards permit, it is usually less damaging to seek alternative access routes than to try to widen the doorway.
- 6.19 Electromagnetic hold-open devices can be useful in cases of limited manoeuvring space at the leading edge of a doorway, or where glazed vision panels would be damaging to the historic fabric and appearance of the door. It is often possible to re-hang doors or to add discreet aids or mechanical opening devices without damaging historic fabric or replacing historic door furniture. Where an automated approach is taken, consideration must be given to the location, ease of use and colour of the opening control.
- 6.20 Thresholds or other small changes in level up to 25mm can normally be made more accessible by bevelling the leading edge and marking with contrasting colour/texture. Ramps or raised floors over historic fabric can be helpful in easing larger level changes.
- 6.21 Where solid doors present a risk of collision for users, there are a number of options that can be considered to reduce the impact of alterations on the historic fabric:
- consider a controlled release for propping open an internal door (where this is acceptable for fire protection purposes);
  - if creating a 'vision panel', remove and glaze a single door panel rather than cutting through the structural elements of the door;
  - if there are external storm doors, with glazed doors behind, explore having the storm doors open when the building is open, or controlled automatically;
  - consider forming a new inner door if appropriate; or
  - as a last resort, remove the door and store it, replacing it with a sensitively designed alternative.

### Floor Surfaces

- 6.22 Repair or alteration of uneven historic floors to provide a level surface is usually possible. Where floor surfaces are fragile or slippery, a surface covering or carpet may be appropriate to avoid risk to vulnerable walkers and to protect the finish.

### Stairs and landings

- 6.23 Much of the guidance on external steps applies to internal staircases. Staircases are often the most significant feature of a historic interior. Additional handrails of appropriate quality



and design can normally be installed in a manner that does not diminish the special interest of the stair. In many cases contrasting tactile nosings can be applied easily to stair treads and landings to improve their visibility. Where this is not possible, carpeting or contrast lighting can help to distinguish stair heights and depths.

- 6.24 Internal lifts should either be well incorporated within the detailed design of a historic interior or be a clear modern intervention that respects it. Where possible they should be located in secondary areas, or in parts of the building that have already been altered in the past. The plan or decorative detail of principal rooms should not be damaged in the provision of lift access. Platform-passenger lifts can be suitable for changes in level up to 4m. With careful design they can be accommodated discreetly and are usually suitable for a wide range of users. Emergency exits and fire refuges must be considered in conjunction with lift provision.
- 6.25 Stair lifts can have a significant impact on the character of a historic staircase and normally require the user to be assisted: they should generally be used as a last resort in situations where other access improvement measures are not practical. Careful consideration should be given to their location, design and detailing to minimise their effect.

### Extensions and additions

- 6.26 A proposed new extension to a historic building or new building in a historic place should be used as an opportunity to explore improved access throughout the site.
- 6.27 A significant alteration, such as a lift or stair tower, may be appropriate where an addition is proposed that maintains the integrity of a historic feature or adds a contemporary layer of interest. Further guidance is available in this series on the extension of historic buildings.

### Lighting

- 6.28 Good lighting in and around a historic building can help to ensure safe and easy access. Effective lighting schemes that avoid sudden changes in level or glare, but identify potential hazards, are generally easy to accommodate within a historic building.

### Signage

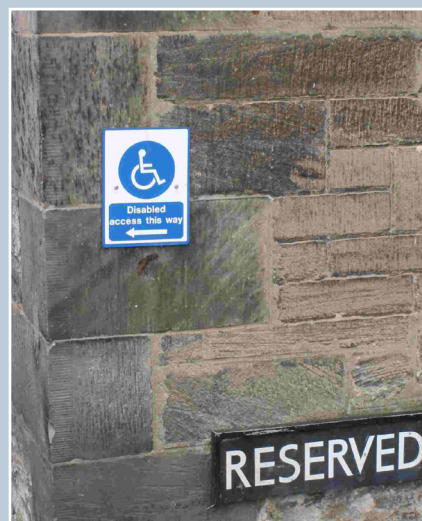
- 6.29 Signage is usually best considered as part of an integrated communication scheme that guides all users to and around a historic building. Braille and tactile signage, combined with clear colour contrast and appropriate fonts, is likely to be of assistance to the widest range of users. Care needs to be taken to ensure that signage is positioned and sized both for utility and also for sensitivity to the character and fabric of the historic building or place. Signage is usually subject to relatively frequent change,



*New wide openings were created at the rear of Kelvingrove Art Gallery in Glasgow to provide level access to the building.*



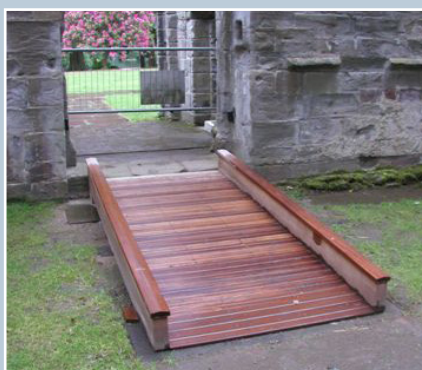
*A new lift tower in complementary style was added to the East Mill at Stanley Mills, Perth and Kinross, as part of its conversion to residential accommodation.*



*Visitor signage in the car park at Linlithgow Sheriff Court, clearly marking the route to the accessible entrance. © West Lothian Council.*



*An accessible entrance to the City Chambers, Glasgow, part of a well-considered access arrangement that takes in both physical and management aspects of approaches, entrances, and moving around the building. The pavement has been adjusted to lessen the gradient of the ramp. Different colours are used to demarcate the ramp, and the texture creates a non-slip surface. Railings are provided for support. The doors operate from a large push control, and there is a speakerphone for assistance if necessary. Signage indicates the accessible entrance and continues throughout the interior of the building. An access guide is available online, or at the building, for blind or visually impaired visitors. Loan wheelchairs are also available.*



*A short, free-standing ramp at Dunkeld Cathedral allows access over the nave threshold without fixtures or disturbance to the underlying archaeology.*

so fixtures must be used sparingly with reversibility in mind. In some cases free-standing signage may be the most appropriate.

## 7. MAINTENANCE AND REVIEW

- 7.1 The cost of long-term maintenance of access improvements, particularly mechanical equipment, must be taken into account at the planning stage. For safe operation, mechanical equipment needs regular checking and servicing. Where non-historic equipment has become redundant or obsolete, it should be removed or replaced.
- 7.2 The provision of access should be continually monitored as user patterns may alter and technology may offer solutions to previously insurmountable obstacles.

## 8. DESIGN AND ACCESS STATEMENTS

- 8.1 Supporting design and access statements are recommended for inclusion with all relevant listed building consent applications. A design and access statement is a document setting out the design principles and concepts that have been applied to the development and explaining how issues relating to access for disabled people have been dealt with. It is also useful to include an analysis of the site and its setting, describe the context of the proposed alterations, set out the reasons for the selected design, note investigation of alternatives, and summarise the responses to any consultations. Guidance on producing design and access statements is available from most planning authorities.

## 9. ARCHAEOLOGY

- 9.1 It is possible that archaeological resources survive within or beneath a listed building or unlisted building in a conservation area. Advice on archaeological sensitivity should be obtained from the planning authority's archaeological adviser at an early stage. Planning authorities should seek to manage archaeological issues, such as recording or preservation in situ, through the use of conditions or agreements under Section 75 of the Town & Country Planning (Scotland) Act 1997.

## 10. RECORDING

- 10.1 When proposed accessibility works will result in a significant loss of fabric or changes to the character, it is recommended that the Royal Commission on the Ancient and Historical Monuments of Scotland is given the opportunity to record the historic building or place prior to works commencing. [www.rcahms.gov.uk](http://www.rcahms.gov.uk)

## 11. CONSENTS

- 11.1 Scheduled monument consent is always required for works to scheduled monuments. Applications for scheduled monument consent should be made to Historic Scotland.
- 11.2 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 11.3 Where listed building consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and proposed works in context. It is normally helpful to provide detailed technical information and photographs. A design and access statement is also recommended (see above).

## 12. OTHER ORGANISATIONS

- 12.1 Information and guidance on discrimination and human rights issues is available from:

Equality & Human Rights Commission Helpline Scotland  
Freepost RRLL-GYLB-UJTA  
The Optima Building  
58 Robertson Street  
GLASGOW  
G2 8DU

Helpline tel: 0845 604 5510 or Helpline fax: 0845 604 5530  
Helpline textphone: 0845 604 5520  
E-mail: [scotland@equalityhumanrights.com](mailto:scotland@equalityhumanrights.com)  
Web: [www.equalityhumanrights.com](http://www.equalityhumanrights.com)

Information on Access Panels is available from:

Scottish Disability Equality Forum  
12 Enterprise House  
Springkerse Business Park  
STIRLING  
FK7 7UF

Tel (Access Team): 01786 473152  
Email: [accessdevadmin@sdef.org.uk](mailto:accessdevadmin@sdef.org.uk)  
Web: [www.sdef.org.uk](http://www.sdef.org.uk)



*A small platform lift providing disabled access at a property in Hawick.*



## Other selected Historic Scotland publications and links

[Technical Advice Note 7: Access to the Built Heritage](#) (1996) (available for purchase from Historic Scotland)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.

## Other selected publications and links

Scottish Government, [Planning Advice Note 78: Inclusive Design](#) (2006) (Scottish Government web page)

English Heritage, [Easy Access to Historic Buildings](#) (2004) (PDF 1.5Mb from English Heritage's website)

English Heritage, [Easy Access to Historic Landscapes](#) (2005) (PDF 1.5Mb from Historic Scotland's website)

R Cowan (ed.), *Design & Access Statements Explained* (2008)

## Other contacts and links

### National Register of Access Consultants

70 South Lambeth Road  
LONDON  
SW8 1RL

Tel: 020 7735 7845  
Fax: 020 7840 5811  
SMS: 07921 700 089  
Email: [info@nrac.org.uk](mailto:info@nrac.org.uk)  
Web: [www.nrac.org.uk](http://www.nrac.org.uk)

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

Historic Scotland  
Longmore House  
Salisbury Place  
EDINBURGH  
EH9 1SH

Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

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[www.historicscotlandimages.gov.uk](http://www.historicscotlandimages.gov.uk)

### Cover images

*The portico of the Museum of Modern Art, Glasgow, where part of the plinth has been cut away to create ramped access in place of steps.*

*Kelvingrove Museum and Art Gallery, Glasgow. New high-quality handrails add both artistic interest and functional practicality to one of the main staircases.*

*Accessible entrance to the Perth Road Library, Dundee.*



# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

## ASSET MANAGEMENT



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

APRIL 2019

MANAGING CHANGE IS A SERIES OF GUIDANCE NOTES PRODUCED BY HISTORIC ENVIRONMENT SCOTLAND IN OUR ROLE AS LEAD PUBLIC BODY FOR THE HISTORIC ENVIRONMENT. THE SERIES SUPPORTS NATIONAL LEVEL POLICY FOR PLANNING AND THE HISTORIC ENVIRONMENT. PLANNING AND OTHER AUTHORITIES SHOULD TAKE THIS GUIDANCE INTO ACCOUNT WHEN MAKING DECISIONS.

THIS NOTE IS OF PARTICULAR RELEVANCE TO GOVERNMENT DEPARTMENTS, LOCAL AUTHORITIES, PUBLIC BODIES, AND THOSE WITH LARGE ESTATES WITH MULTIPLE HISTORIC ENVIRONMENT ASSETS.





Above: The Crichton Estate, Dumfries, is a 85-acre parkland estate with many listed buildings, managed by The Crichton Trust  
© Crown Copyright: HES SC 1671000

Below: Auchterless Old Parish Church. This site is included in Aberdeenshire Council's *Heritage Asset Management Project*  
©HES 084544





## INTRODUCTION

It is a long-accepted principle that all organisations should be responsible for the care of assets in their ownership or care, including historic assets on land and under the sea. It is their responsibility to ensure that these assets are properly managed and are handed on to future generations in good condition.

All organisations that manage large land and property portfolios are expected to build the protection, management, maintenance or repair of historic assets into their operational and budgetary plans.

## CONTEXT

As well as private landowners, many parts of national and local government and its agencies have an extensive historic estate encompassing buildings (both in use and not), archaeological sites and historic landscapes. Some of these assets have statutory protection as listed buildings or scheduled monuments, or because they lie within Conservation Areas. Others may be included on the Inventories of Gardens and Designed Landscapes or Historic Battlefields, or are in World Heritage Sites, National Parks, National Nature Reserves

and National Scenic Areas. Organisations need to have a consistent and coordinated approach to protecting these historic assets in the course of their estate management, disposal and procurement activities.

Some assets are best maintained in whatever state they have come down to us (for example archaeological sites); others are best maintained in a viable and appropriate use.

This advice note sets out the principles that apply to the management of the historic environment as part of an overall asset management approach to land and property portfolios in public and private ownership. This includes but is not exclusive to:

- all Scottish Government Directorates and Departments, Executive Agencies and Non-Departmental Public Bodies;
- National Health Service, Scotland;
- UK Government Departments operating in Scotland (whose duties in this area were previously set out in the Scottish Historic Environment Policy and the earlier 2003 DCMS 'Protocol');
- Universities; and
- Privately-owned estates



The University of Glasgow manages over 100 listed buildings on the Hillhead campus. An *Estates Conservation Strategy* was produced in 2012 to assist in the management and development of the estate. © RCAHMS DP015701



Forestry and Land Scotland manages 660,000 hectares of land across Scotland. Many scheduled monument are managed as part of this estate, including sites like these World War II defences © Forestry Commission Scotland

The approach applies to property owned, managed, rented or leased out (where the terms of the lease retain responsibility with the owner). Where responsibility for maintaining archaeological sites and monuments, buildings or land is permanently transferred to the private sector, the requirements of this guidance may need to be incorporated in the terms of any contract.

It is an important principle that this document and any guidance and advice issued by us are exercised in a proportionate way appropriate to the actual needs of, and what is practicable for, the assets being managed, and to any over-riding operational or legal requirements (such as the security of listed prison buildings or other installations).

Some historic assets will comprise or form part of sites designated also for their national or international biodiversity, natural environment or landscape interest. In such cases an appropriate balance will have to be found between any different management requirements.

Relevant legislation that organisations managing multiple heritage assets should be familiar with includes:

- *Scheduled Monuments & Archaeological Areas Act 1979.*
- *Listed Buildings and Conservation Areas (Scotland) Act 1997*

1877 view of the sluice intake on Loch Katrine, part of the Glasgow Waterworks Loch Katrine Scheme, and one of many designated assets now owned and managed by Scottish Water © RCAHMS SC 1057692

## HEP1

Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.

## HEP4

Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.



*Loch Katrine,  
Sluice at Inlet to Aqueduct and Royal Cottage*

## IMPLEMENTATION

Owners and asset managers should:

### 1. Know what assets they have

Organisations should be aware of the designated historic assets in their estate and should either establish and maintain an inventory of assets, or ensure that their existing property/asset management systems take account of historic aspects. For example, the Local Government in Scotland Act 2003 places reporting obligations on local authorities which includes assets for which they have responsibility. Historic environment assets should feature in this.

Such assets might include:

- a building or group of buildings;
- part of a building (e.g. a retained façade);
- an individual archaeological site or monument; or
- a group of monuments.

Priority in all activities should be given to designated assets (scheduled monuments; listed buildings; conservation areas; gardens and designed landscapes or battlefields on the Inventories). This record should where possible incorporate a detailed record of the asset; any relevant condition data; and an assessment of the asset's cultural significance based on available information.

Historic assets that are not scheduled, listed or on the Inventories – particularly archaeological features and anything which contributes to the outstanding universal value (OUV) of a World Heritage Site – may be material considerations in the planning system or require mitigation in advance of development and bodies should normally also record the location and, if known, the extent of such assets. These basic data are available from us and from local Historic Environment Records.

### 2. Identify a responsible officer

Someone within each organisation should take

responsibility for ensuring that policies and procedures for the historic environment are in place. This person should ensure that a record of historic assets is maintained, including any significant interventions in the historic environment such as management, repair, maintenance and adaptations. The officer should ensure that individual property managers are aware of their responsibilities under the relevant heritage legislation and associated guidance issued by Historic Environment Scotland and the appropriate local authority. Where a building is in shared occupation, one organisation should be identified as taking the lead. The officer should be a person at an appropriate level in the conservation or property management structure of the organisation. Where a body has significant holdings of historic assets a director or senior manager should have oversight of their conservation. The officer could also seek to champion the historic environment within their care, adding social value thorough knowledge dissemination, targeted research and local place-based learning opportunities.

### 3. Use consultants and contractors with appropriate qualifications and expertise

It is strongly recommended that specialist conservation consultants and practitioners appropriate to the nature and significance of the asset and the scale of the works are used to prepare historic building records, archaeological measured surveys and condition surveys; and to advise on any works of alteration or repair. This also applies to works of research, evaluation and investigation.

### 4. Commission historic building records, archaeological measured surveys, condition surveys, inspections and research where appropriate

The recommended method to achieve a sound asset management approach is to prepare a detailed baseline record and to maintain a system of regular condition surveys for a designated asset (no more than 5 years apart is identified as best practice), appropriate to the sort of historic asset.



Buildings will require a very different approach from, for instance, archaeological earthworks. Such a survey cycle should not replace any more intensive programme of inspection, for example for health and safety reasons such as to ensure that stonework is stable. These reports should identify and prioritise necessary repair and major maintenance requirements. For major infrastructure projects reports should set out the measures carried out to locate, assess significance, avoid, mitigate and record/investigate historic environment assets. If buildings in intensive use are the subject of continuous surveillance and maintenance periodic formal inspections may not be necessary.

## 5. Develop site-specific management guidance

Site specific management should take into account the condition of the asset (and associated conservation management advice). Where appropriate, conservation management should be prioritised towards those sites identified as most in need. Examples of management and survey programmes include:

- Where a monument is scheduled, condition reports provided by the HES Field Officer
- The National Trust for Scotland's five-year survey cycle;



The National Trust for Scotland owns and manages around 130 properties and 180,000 acres of land across Scotland, including St Kilda, above. © Crown Copyright: HES SC 1467638

- Aberdeenshire Council's Historic Asset Management Project.

Where appropriate, in addition to regular condition reports, further site-specific guidance can usefully be prepared such as conservation management plans and incident response plans. Such guidance, which should be based upon a thorough understanding of the significance of the asset, will enable sound judgements to be made about repairs, alterations, management, reuse or disposal.

In order to understand fully the building or site, it may be necessary to commission additional research, analysis, survey or investigation. This may be necessary in advance of carrying out works, or in the course of preparing conservation management plans, management guidelines or conservation manuals. A repair and maintenance programme on its own may be insufficient to address complex conservation problems and inherent defects.

Management provisions may include risk assessment, disaster planning, access guidance, preventive conservation and environmental assessment particularly where there are inherent defects, vulnerable interiors and any potential conflict between conservation and building use.



Ardtornish Estate, near Lochaline, is an example of a privately-owned estate with multiple heritage assets. It includes a number of some of the earliest example of concrete structures in Scotland. © RCAHMS DP 151195



## **6. Draw up and implement a prioritised maintenance schedule, and planned programme of repairs, maintenance and preventative conservation**

Where it is appropriate, planned maintenance registers and forward repair plans are recommended as a means of converting the information provided by the inspections and investigative work into prioritised and costed forward programmes of work. This can vary from cutting vegetation to previously planned maintenance on a major building.

Future repairs identified in the condition reports and surveys, with their estimated costs, and day-to-day maintenance requirements identified in the conservation manual should be included on the register, so that targets can be set for each historic asset over the years.

Appropriate consents should be sought for proposed works. For example, repairs, maintenance and preventative conservation of scheduled monuments would likely require consent from us and alterations to listed buildings would likely require consent from the local authority.

## **7. Ensure a high standard of design in any new work and in the alteration of the historic environment**

New work, including alterations and extensions to historic buildings as well as new buildings in historic areas, should enhance its surroundings. Design and Access Statements are a way of demonstrating that design, refurbishment and product selection decisions have, or will, address the obligations of reasonableness in line with the Equality Act 2010. New work should also take into account the principles of sustainable development.

## **8. Ensure that appropriate materials and management regimes are used**

Particularly before 1919 most buildings were erected using locally-sourced materials by a labour force with traditional construction skills. Repairs to historic buildings are best carried out using similar materials and an appropriately skilled workforce.

The inappropriate use of modern materials, such as cement renders, can cause major damage to historic structures. Older buildings also need appropriate heating and ventilation. It is always better to work with rather than against the needs of an historic structure. Further information can be sought from the following sources:

- Our publications and technical advice – [www.engineshed.scot](http://www.engineshed.scot);
- Local authority local development plan policies and supplementary guidance;

## **9. Protect buildings at risk**

The Buildings at Risk Register for Scotland is maintained by us, and provides information on properties of architectural or historic merit throughout the country that are considered to be at risk. A Building at Risk is usually a listed building, or an unlisted building within a conservation area, that meets one or more of the following criteria:

- vacant with no identified new use (unless a suitable maintenance regime is in place);
- suffering from neglect and/or poor maintenance;
- suffering from structural problems;
- fire damaged;
- unsecured;
- open to the elements;
- threatened with demolition.

To be at risk, a building does not necessarily need to be in poor condition, it may simply be standing empty with no clear future use. Many buildings at risk are in this latter category. The buildings at risk register (BARR) is available online at [www.buildingsatrisk.org.uk](http://www.buildingsatrisk.org.uk), and includes a page with useful links, and a toolkit.

Every endeavour should therefore be made by organisations to ensure that their buildings should not be in such a state as to be on this Register. If buildings are on the Register organisations are urged to work with the statutory authorities to agree a strategy for resolving each case.

#### 10. Work to keep buildings in active use

Wherever possible, bodies should work imaginatively with others in the private, public and charitable sectors to find new uses or identify appropriate management regimes for redundant buildings.

For more information on community empowerment, we have published guidance on Community Empowerment and Asset Transfer. For the associated guidance and legislation in Scotland see [www.gov.scot/Topics/People/engage](http://www.gov.scot/Topics/People/engage). Further information can be sought from the Development Trusts Association Scotland and the Scottish Land Fund.

#### 11. Ensure that the historic environment is included in climate change actions plans and policies

The historic environment should be included in all site-specific climate change action plans and policies. It is recommended that they include assessment of climate change impacts, measures to ensure that vulnerable sites can respond to changes in climate, monitoring, control and reduction of site carbon footprint and energy usage. All energy efficiency measures should be effective, appropriate and take into account any special historic or architectural features of buildings and landscapes.



Bonnington Hydro Electric Power Station, part of the Lanark Hydro Electric Scheme, and one of many operational listed structures owned and managed by Scottish Power. © RCAHMS SC 974036

## ROLE OF HISTORIC ENVIRONMENT SCOTLAND

We are the lead public body in matters relating to the historic environment in Scotland. We have statutory functions, for example in relation to scheduled monuments and listed buildings, historic marine protected areas, gardens and designed landscapes and historic battlefields, and we welcome preliminary discussion of proposals that will affect designated sites and buildings.

As noted above, bodies are expected to make the necessary internal arrangements for the management of assets in their care. We can provide advice on policies and processes and, where necessary, on individual cases. We will assist in every practical way to ensure that the historic environment is treated with sympathy and properly cared for. We would welcome the opportunity to contribute to the development of regional or estate-wide historic environment action plans to support an asset management approach.

We operate a programme of monument inspection via its Field Officers. A useful reference for assessing the condition of monuments are our Field Officer Condition assessments which categorise monuments as 'optimal', 'satisfactory', 'unsatisfactory' etc. We can provide the methodology and a proforma sheet for producing similar assessments.

We also distribute grant monies from Scottish Government and it is Scottish Ministers' policy that public funds supplied to us for grant-aid for regular historic building repair and maintenance or normal conservation management agreements will not be channelled to other parts of government.

Historic Environment Scotland's casework team can provide advice about designated assets.  
© Historic Environment Scotland



## Strategy, policy and procedure

[Our Place in Time:  
The Historic Environment Strategy for Scotland](#)

[Historic Environment Policy Statement](#)

[Historic Environment Scotland: Designation Policy  
and Selection Guidance](#)

[Historic Environment Scotland: Scheduled  
Monument Consents Policy](#)

[Historic Environment Circular: Regulations and  
Procedures](#)

[Scotland's Archaeology Strategy](#)

## Guidance

[Managing Change in the Historic Environment  
guidance series](#)

[HES Technical advice notes \(TANs\), Short Guides,  
Inform Guides, and Practitioners Guides](#)

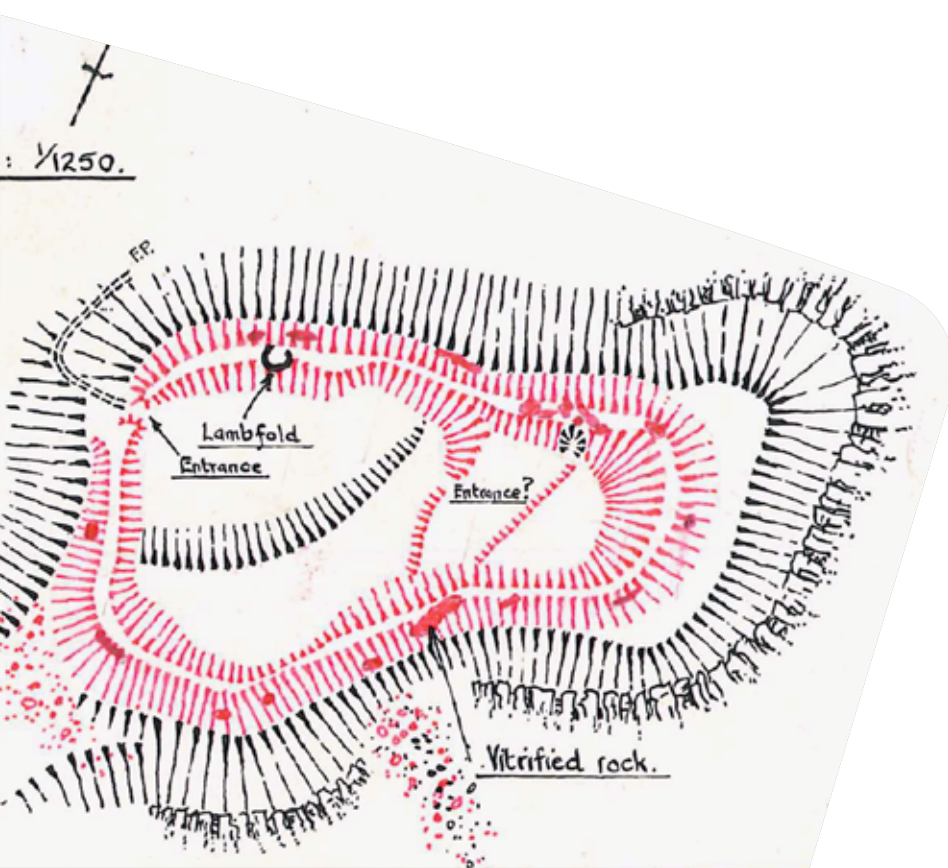
[Scottish Government Planning Advice Note \(PAN\)  
2/2011: Planning and Archaeology](#)

[Scottish Government Planning Advice Note \(PAN\)  
71: Conservation Area Management](#)

## Online resources

[Historic Environment Scotland website](#)

[Designation records and decisions](#)



1961 survey drawing of Dun Deardail fort, part of Forestry and Land Scotland's extensive estate. A project that formed part of the Nevis Landscape Partnership both increased public engagement with the site and informed future management .  
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**Front cover image:** Banavie Locks on the Caledonian Canal, a scheduled monument managed by Scottish Canals. The majority of the canal network managed by Scottish Canals is designated as scheduled monuments, with a number of listed buildings also included in the estate. © RCAHMS DP 023912



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# Boundaries



# Key Issues

- 1. Walls, fences and other boundary treatments form important elements in defining the character of historic buildings, conservation areas and designed landscapes. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area.**
- 2. Age, design, materials, and associated features are amongst the factors that contribute to the interest of historic boundaries.**
- 3. In planning works to historic boundaries it is important to understand and protect their key characteristics.**
- 4. Walls often use local building materials or local traditions. New work should seek to maintain this wherever possible.**
- 5. Physical or documentary evidence should inform the reinstatement or reconstruction of boundary treatments.**
- 6. Planning authorities give advice on the requirement for listed building consent, planning and other permissions.**

## 1. INTRODUCTION

- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to altering the boundary treatments of historic buildings. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K). Local authorities' archaeological advisers are a source of advice about potential archaeological sensitivity.
- 1.4 The legal issue of 'curtilage', or extent of property ownership, is not covered in this guidance note. Its definition is a matter for the local authority in each case, but may be ultimately determined by the courts. Professional legal advice is recommended in cases of doubt.

## 2. WHAT ARE BOUNDARY TREATMENTS?

- 2.1 A boundary treatment is a structure such as a ditch, wall, or fence, used to mark the boundary of a property, or part of a property. In many cases boundaries have associated structures or fixtures including gates, gatepiers, and lamp standards. Historic planting, such as a hedge or tree avenue, is often used to define a boundary. Only trees in Conservation Areas or those subject to specific Tree Preservation Orders (TPO) are subject to control by the Planning Authority.
- 2.2 Some boundaries, such as the walls of a walled garden or graveyard, might be protected by listing in their own right, whilst other boundaries can be of interest for their contribution to the character of a building, group of buildings, or area.



A domestic boundary wall in Ayr. The cast-iron street name sign and wall letterbox fixtures form part of the character of the wall. © N. Haynes.



A long complete stretch of iron railings and lamps at Regent Terrace, Edinburgh, part of the development planned by William Henry Playfair in 1825 and built 1826–33. © N. Haynes.



Circa 1865 cast-iron railings at a tenement in Sanda Street, Glasgow. © N. Haynes.



The 'Bear Gates', Traquair House, Scottish Borders, constructed in 1737–8. Part of their historical and associative interest is a legend that the gates were closed behind Bonnie Prince Charlie in 1745 and have not been opened since. © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).





Three early 17th-century charter boles (used for defining boundaries and keeping property charters) set in the high wall of one of the long rig plots in South Street, St Andrews.



Part of the Citadel wall in Ayr, designed by the military engineer, Hans Ewald Tessen, in 1652 to protect Oliver Cromwell's garrison in the town. The corner turret is a 19th-century folly. The surviving walls of this large military complex are now in multiple ownership. © N. Haynes.



Like many 18th- and 19th-century buildings in Shetland, Belmont House (1777), Unst, stands at the centre of an extended formal arrangement of field boundaries. This aerial view was taken in 2005 before the recent restoration of the house. © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).

### 3. WHY ARE BOUNDARY TREATMENTS IMPORTANT?

- 3.1 The layout and design of a boundary, its materials and method of construction, and the way in which it relates to other structures can be important elements of the character of a building or street, or contribute substantially to the sense of place and historical understanding of a rural or urban landscape.
- 3.2 Many boundaries are largely decorative, but others are functional, marking property ownership or providing security, privacy, shelter, safety, defence, containment of livestock, or even structural support as retaining walls. Some boundaries or gateways have historical associations with significant events or people, or play a part in ceremonies or rituals. 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.

### 4. IDENTIFYING THE INTEREST OF HISTORIC BOUNDARY TREATMENTS

#### Design qualities

- 4.1 Design qualities include the way in which a boundary is laid out or altered, its physical dimensions and appearance, the sense of enclosure it provides, its associated features, and its relationship with other structures. These qualities can be consciously determined by a designer or achieved more informally by craftsmen/tradesmen in conjunction with property owners. The age and rarity of the boundary are also factors in its interest.
- 4.2 Design qualities of boundaries, such as height and visual permeability, usually relate closely to function and location. High, solid walls are associated with controlling access or providing shelter, whilst fences, railings, balustrades and low walls are intended to allow views through or over the boundary. Some boundaries, such as 'hahas' (sunken retaining walls and ditches), are designed to be invisible from some directions, but still provide containment for livestock.
- 4.3 Boundaries and their associated structures and fixtures often have formal design relationships with a building or garden/landscape. For example, a garden wall might be arranged to form a symmetrical compartment around a house, with a gateway aligned on the axis of the house. Another type of relationship could include a stylistic similarity between the treatment of the boundary and the architectural characteristics of the house, such as a crenellated cope.
- 4.4 A particular characteristic of many boundaries is their scale in terms of length or height. 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. The continuity or uniformity of a boundary can characterise a whole street or area of the same period, style, historical development or original ownership.

### Material qualities

- 4.5 Design considerations were normally determined by the technological capabilities of the period, the availability of local building materials, and the craft or trade traditions of particular areas.
- 4.6 From an early date ditches and/or turf walls were constructed around buildings for defensive purposes. These were superseded by stone walls. Stone walls were also used in and around the medieval burghs for demarcating plots of land, or 'feus', and for controlling trade through the official 'ports' (gateways). Stone boundary walls of various types and dates characterise cities, towns, villages, and remain a very potent symbol of agricultural 'improvement' from the mid-18th century onwards. Where the boundary walls form a contiguous feature of a harled building, they are often harled to match.
- 4.7 Brick was frequently used for its qualities of heat retention in the construction of walled gardens. Concrete, and composite materials like Coade Stone, may reflect local character in boundary walls.
- 4.8 Cast-iron railings define the edge of the public realm and the fronts of properties in many planned developments of the late 18th and 19th centuries. Boundaries to the rear of properties tended to be of high rubble walls with 'slaister' (widely spread) mortaring and stone copes. The iron industry of the 19th century resulted in a great variety of decorative cast and wrought iron railings and gates from the sober to the exuberant, a feature that continued through to early 20th-century boundaries. Suburban Victorian properties frequently feature



*Boundary walls at a country estate in the Scottish Borders.*



*The famous 1761 Pineapple pavilion (now a holiday cottage) forms part of the boundary of the walled garden at Dunmore, Falkirk. Pineries originally flanked the entrance: heating and ventilation shafts for the glass houses are built into the brick walls. © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*

*Hopetoun House, West Lothian, viewed from beyond the haha. The sunken wall and ditch allowed unobstructed views from the house, but kept livestock out of the garden.*







*Bee boles (niches for bee hives) set into a boundary wall at Law's Close, High Street, Kirkcaldy, Fife.*



*Meikleour Beech Hedge, Perth & Kinross. Whilst a low, drystone wall forms the policy boundary with the A984, the associated beech hedge, believed to have been planted in 1745, is the dominant feature.*  
© N. Haynes.

dwarf ashlar walls topped with cast-iron railings with matching gates. Cast-iron lamp standards contribute to the character of an area.

- 4.9 The rustic qualities of timber were sometimes exploited by designers in boundary fencing from the later 18th to the mid 19th-century, but little of the original fabric now survives. Original timber fences can still be found on the boundaries of late 19th-century Arts and Crafts buildings. Nineteenth-century timber pedestrian and carriage gates are also common features.

#### **Associated structures and fixtures**

- 4.10 From early times boundaries have been constructed to incorporate functional and decorative features, such as gateways and bee boles (niches for bee hives). The range of features expanded from the 18th century, with the incorporation of lighting and other infrastructure fixtures, including signage and post boxes. Such structures and fixtures are often of significant interest and contribute to the character of the boundary.

## **5. GENERAL PRINCIPLES FOR ALTERATIONS AND REPAIRS**

### **Character and interest of the boundary**

- 5.1 Alterations or repairs to a historic boundary should protect its character. Walls and fences can be valuable in their own right as major elements in the design of a historic building and its setting, or in a broader streetscape or landscape. Documentary research and fabric analysis can be useful in understanding the design and material properties of historic boundaries before undertaking alterations or repairs.
- 5.2 The precedent of alterations in unified designs of streets and other groups of buildings should be considered. Where historic planting contributes to the character of the boundary, it should also be taken into account.

### **Maintenance**

- 5.3 Regular inspection, maintenance and appropriate repair are essential to maintaining the structural and visual integrity of historic boundaries and their associated features. Cast-iron gates and railings require a regular schedule of painting to prevent corrosion. Where extensive historic boundaries are now in multiple ownership, a co-ordinated approach to maintenance is desirable to ensure a consistent approach. Where they contribute, planted boundaries should be retained wherever possible.

### **Alterations**

- 5.4 All alteration proposals must take into account the design and material characteristics of the historic boundary. Lowering of walls to create better sightlines can be damaging to the

character of the boundary and gateway. Alternative locations for access may have less impact on a boundary and provide safer approaches for vehicles. The design, materials and execution of alterations should have regard to the original.

### New Openings

- 5.5 The formation of a new opening needs to be considered in light of the overall composition of the boundary and assessed as to whether it would be consistent with the existing design. Where the formation of a new opening is found to be consistent, the minimum of historic fabric should be lost and the opening should normally be detailed to match the existing openings. In some cases it might be appropriate to introduce high-quality contemporary design to new fixtures like gates.

### Widening of openings

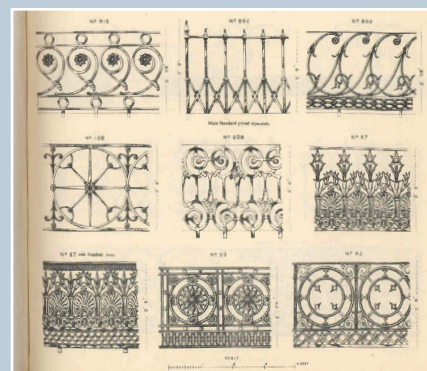
- 5.6 The widening of gateways should be avoided where it will adversely affect the coherence and proportion of a design or the relationship of the gateway to another building or planned layout. In other cases, particularly where historic gates are not part of the design or have been previously removed, careful dismantling and reconstruction of gatepiers to provide a wider opening may be possible.

### Rebuilding

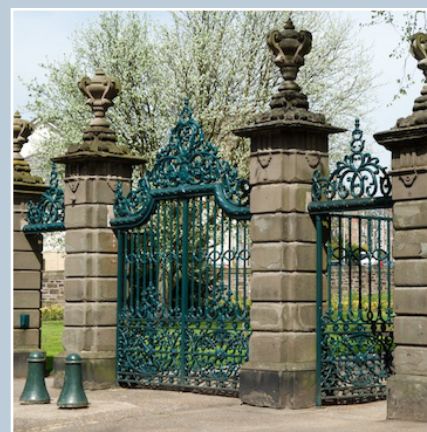
- 5.7 There may be occasions where a boundary wall needs to be rebuilt for structural reasons. In cases where the boundary is of interest in its own right, or contributes to the interest of another structure, it is usually possible to rebuild the boundary reusing the bulk of the dismantled original material. Dressed stone in particular should be rebuilt in its original position. It is important to maintain the proportions, depth and irregularities arising from historic methods of construction in the rebuilt wall. Where alterations are proposed the design, materials and execution should have regard to the original. The opportunity can be taken to restore any details of the wall that have previously been altered. Proposals to rebuild should normally be supported by a structural report, photographs and detailed survey drawings. This is particularly the case where faithful reconstruction is proposed. The local authority will then determine whether consent is required.

### Reinstatement

- 5.8 Although cast and wrought iron railings are a feature of boundaries from the mid 18th-century to the mid 20th-century, many were removed from cities and towns during the Second World War. Where portions of historic cast-iron railings remain or photographic evidence exists, the restoration of traditionally detailed railings is appropriate. The method of fixing new railings to copes must be balanced against preventing damage to historic fabric. Historic Scotland's *Inform Guide: Boundary Ironwork - A Guide to Reinstatement* provides further details on



Late 19th-century catalogue of railings produced by MacFarlane's Saracen Foundry, Glasgow. Specialist iron foundries are still able to reproduce these patterns for repair and reinstatement work.



Baxter Park, Dundee. The cast-iron gatepiers and cresting of 1863 survived, but the gates were missing until they were replaced as part of the restoration of the park in 2007.



Railings reinstated in 2006 define the edge of Baxter Park, Dundee, and are key to its regeneration and good management. The patterns were deduced from a short surviving section.





*A contemporary gate at the Salisbury Centre, Edinburgh designed by the artist blacksmiths Ratho Byres Forge.*

the practicalities of researching historic patterns and reinstating boundary ironwork.

- 5.9 If there is no clear historic model to follow then high-quality contemporary design may be considered. It should be in materials compatible with the historic fabric and not damage or obscure historic detailing. The means of fixing must be compatible with the historic fabric.

### **Graffiti**

- 5.10 Further information on localised cleaning methods is available in Historic Scotland's Inform Guide: Graffiti and its Safe Removal, details are given on the back page of this leaflet.

## **6. CONSENTS**

- 6.1 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 6.2 Where listed building consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and proposed works in context. It is normally helpful to provide detailed technical information and photographs. A brief description of the interest of the boundary treatment and an explanation of the impact of the alterations are always useful in assessing change.

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

Historic Scotland  
Longmore House  
Salisbury Place  
EDINBURGH  
EH9 1SH

Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

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*Boundary wall at Warsetter Farmhouse (late 19th century), Sanday, Orkney.* © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).

*Detail of the 1871 wrought- and cast-iron 'Golden Gates' at Benmore House, Loch Lomond & the Trossachs National Park.*

*Cast-iron railings (circa 1880), Dowanside Road, Glasgow.* © N Haynes.

## Other selected Historic Scotland publications and links

[Maintaining your Home – A Short Guide for Homeowners](#) (2007) (PDF 1.4MB)

[Scotland's Hidden Gem: Architectural Ironwork in Stornoway](#) (2008) (Historic Scotland online shop)

*Inform Guide: Domestic Boundary Walls* (2008)

*Inform Guide: Maintenance of Iron Gates and Railings* (2007)

*Inform Guide: Boundary Ironwork – A Guide to Reinstatement* (2005)

*Inform Guide: The Use of Lime and Cement in Traditional Buildings* (2007)

*Inform Guide: Repointing Rubble Stonework* (2007)

*Inform Guide: Repairing Brickwork* (2007)

*Inform Guide: Graffiti and its Safe Removal* (2005)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.



HISTORIC  
ENVIRONMENT  
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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

Castles and Towerhouses

May 2017







Above: Castle Tioram, Highland. Consideration of the most appropriate method of preserving the cultural significance of a castle for the future will involve a discussion on the merits of consolidation versus restoration. Each case is considered on its own merits. © Peter Drummond.

Cover image: Eilean Donan Castle, Highland. Eilean Donan was a casualty of war in 1719, and remained abandoned until restoration by Lt Col John Macrae-Gilstrap, 1911-32, in keeping with the original medieval character. Today Eilean Donan is one of Scotland's most recognisable castles and is a significant tourist attraction. © Crown Copyright: Historic Environment Scotland.



# ‘MANAGING CHANGE’ IS A SERIES OF NON-STATUTORY GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. THEY EXPLAIN HOW TO APPLY GOVERNMENT POLICIES.

The aim of the series is to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.

# INTRODUCTION

This note provides guidance for anyone considering a castle consolidation or restoration project, such as owners, local authorities or other interested parties. It sets out the principles that apply to works on castles and towerhouses, and helps guide decision-making on consent for applications relating to castles.

Although castles can still be resilient structures centuries after they were built, some require physical intervention to enable their historic value and importance to be retained, especially in the face of climate change. There is a long tradition of successful castle consolidation (preserving the current state of the building) and restoration, but these projects can be very complex. High-quality project-planning with appropriate investment can deliver a sustainable future for more of these prominent and distinctive structures.

This guidance aims to encourage sensitive works that respect the value of these buildings and secure their cultural importance for the future.

Works to scheduled monuments or listed buildings require scheduled monument or listed building consent before being carried out, in addition to any requirement for planning permission. For advice on this, See [\*Historic Environment Scotland's website\*](#).



Law Castle, North Ayrshire. Restoration of the 15th Century Law Castle in the 1980s required a series of considered interventions such as the installation of a new roof and partial re-building of the parapet. The existing window openings were re-used, avoiding the need for new openings. A harling was also applied to the restored building. Top: © John Buchanan Smith/Scottish Castles Association. Bottom: © Crown Copyright: Historic Environment Scotland.

# KEY ISSUES

1. Castles are a central part of Scotland's heritage and identity. They dominated Scotland's elite secular architecture for centuries until the country house became more popular. Castles can enhance people's local environment, and they are a powerful attraction for visitors. They also contain important information about past lives and society.
2. Owing to their importance, many castles are designated as scheduled monuments or listed buildings.
3. Where work to a castle is proposed, it is essential to understand from the outset what the castle's important features are: what gives it its cultural significance, or special interest.
4. Proposals to consolidate or restore a castle should be planned to protect its significance or special interest. National policy is that any work should be sensitive and safeguard the continued importance of the building for the future.
5. Research is essential to the development of any project. Recording standing buildings and buried archaeological remains is usually necessary, both to avoid loss of information and to inform the works to be done.
6. Informed project management from inception to completion is crucial. Professional advisors can identify risks and costs and suggest appropriate designs and methods. Early consultation with the local planning authority and Historic Environment Scotland is always recommended.

# I.WHY ARE CASTLES IMPORTANT?

Scotland is internationally renowned for its castles. Whether ruined or in use, they are a central part of our heritage and identity. They help to make Scotland's landscapes distinctive.

Castles play a significant role in the modern world, enhancing the environments and lives of people, and attracting and educating visitors. They contribute to the quality of our places and landscapes, and can be a valuable and engaging educational resource.

Borthwick Castle, Midlothian. The surviving fabric of a castle can often contain evidence of past events which add considerable interest to its cultural significance. The damage seen on the east elevation of Borthwick Castle is believed to have been caused by Oliver Cromwell's cannons in 1650. Although the castle was restored in the late 19th century this important historical feature was recognised and retained.

Castle sites can also contain detailed information about past societies, daily life, architecture and building techniques, from the medieval period onwards. This evidence may exist within the masonry of the castle, or may lie beneath the ground as buried archaeological remains.

The importance of castles is recognised by the designation of many as scheduled monuments or listed buildings. For further information, see [Historic Environment Scotland's website](#).





## 2. CONSOLIDATION OR RESTORATION? PRINCIPLES FOR DECISION-MAKING

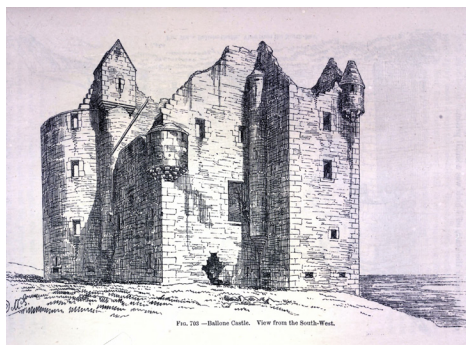
When works to a historic castle are planned, the key aim should be to safeguard it for the future. Castles are usually designated as scheduled monuments or listed buildings, which includes an obligation to preserve their cultural significance or special interest and character. If a castle has been designated it will be important to develop a firm understanding of what qualities led to its being designated.

Sinclair Girnigoe Castle, Highland. A complex scaffolding system was required to stabilise a free-standing chimney stack at Sinclair Girnigoe Castle. This allowed masonry repairs to be carried out in a safe manner and provided protection during these works for archaeologists carrying out excavations underneath the stack.  
© Bill Fernie ([www.caithness.org](http://www.caithness.org))



Above: Lochore Castle, Fife. A programme of consolidation works to the tower and barmkin walls of Lochore Castle included vegetation removal and masonry repairs. No significant alterations were required in order to consolidate the building, which has been safeguarded for future enjoyment by future generations. © Historic Environment Scotland.





Above: Ballone Castle, Highland. Ballone Castle was recorded in the 1880s by David MacGibbon & Thomas Ross, and later photographed in the 1930s. This historic record of the castle enabled the informed restoration of some missing architectural elements. The stair turret cap-house illustrated by MacGibbon & Ross (lost by the 1930s) was re-instated as part of the restoration project.

Top left: from David MacGibbon and Thomas Ross: *The Castellated and Domestic Architecture of Scotland from the twelfth to the eighteenth century*. Top right: © Crown Copyright. Right: © John Buchanan Smith/Scottish Castles Association.



In some cases consolidation will be the best way to preserve the appreciation and understanding of a castle, while in other cases restoration may be a more sustainable and valid approach. This section sets out principles to consider when deciding which approach is more appropriate.

Consolidation projects seek to preserve structures as far as possible in the state they survive in, while restoration projects seek to return structures to an earlier condition that allows active use. There is no general presumption in favour of either approach. Each proposal should be considered on its merits, referring to relevant Historic Environment policy.

Different policies apply for castles which are scheduled and those which are listed.

For scheduled monuments, policy states that works should normally involve the minimum level of intervention that is consistent with conserving what is culturally significant in the monument.

Extensive intervention is only envisaged where it is clearly necessary to secure the longer-term preservation of the monument, or where there would be public benefits of national importance – perhaps relating, for example, to access, understanding, the wider community, or wider economic benefits.

For listed buildings, works that would adversely affect the building's special interest should also be avoided. However, alteration and adaptation will sometimes be necessary to bring a building into beneficial use, and in most cases this should be achievable without damaging the building's special interest.

This means that for a scheduled monument there would normally be more emphasis on conserving its existing form, and for a listed building more emphasis on restoration or adaptations to enable modern use.

Despite the differences of approach, both policies emphasise the key need to avoid impacts that would diminish their cultural significance or special interest – that is, the need to protect the qualities that justify the castle's designation. Section 3 below gives advice on how this significance or interest can be identified and understood.

Other important considerations concern the physical condition of a castle, particularly whether there is sufficient surviving information to allow for an accurate restoration without speculation about the castle's original form. Where there is insufficient evidence to inform complete restoration, there may be scope in some circumstances to augment the historic structure using modern materials and design – but this would have to be carefully considered.

The internal layout of castles reflects their original purposes and constitutes an important part of their character and significance. This means restorers should match their expectations and proposals to what the individual castle can readily deliver. For instance, large, well-lit rooms may be difficult to achieve within the confines of a towerhouse; and floor space may be restricted compared with modern expectations.

In reviewing options for a castle's future, it may be relevant to consider whether its current management is sustainable, how improved management could be delivered to sustain its current state, or whether restoration should be viewed as an opportunity to ensure its long-term preservation. It is important to weigh up how different options might preserve or compromise the castle's significance. What are the current and foreseeable risks to the castle's condition? And what is the possibility of alternative approaches emerging in the foreseeable future – ones that would result in less physical change?

In any project there is usually more than one option to consider. The case for change is likely to be stronger where all options have been explored in order to identify the approach that would have least impact on the building's significance.

### 3. IDENTIFYING THE INTEREST IN A HISTORIC CASTLE

In order to safeguard a castle's future it is important to first understand what contributes to its cultural significance or special interest and character.

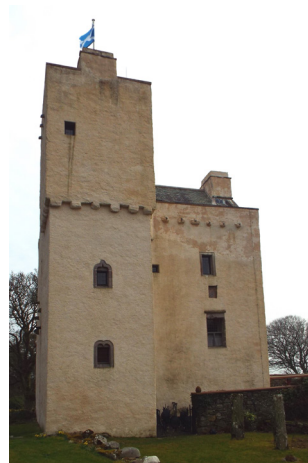
The particular qualities of a castle which contribute to its cultural significance or special interest will vary. They may include the physical evidence of the past preserved in the fabric of standing buildings or below ground; the architectural styles that are visible, and the ability to 'read' and understand the structure; the phases of the building's development; its authenticity; its potential rarity; if it remains intact, unencumbered by modern development, or was adapted in ways that contribute to its continued importance; associations with important personalities, stories or families; its contribution to its surroundings; or the ability for the wider community to enjoy and appreciate the monument.

Sometimes, the highlighted qualities of a castle may include its ruined state – for example, where the castle ruin was exploited as part of a picturesque view. The castle's condition may allow many building phases to be visible, giving understanding of the structure's past use, evolution and form. Its present form and fabric may derive from specific historical events; it may have widely recognised aesthetic attributes, perhaps celebrated in works of art; or it may have particular significance to people who use or have used the monument.

Working with professional advisors to understand the existing structure and its immediate surroundings is recommended before starting to plan restoration or consolidation work.

This will normally include conducting historical/ archival research, and considering buried archaeology as well as upstanding masonry.

Castles are often multi-phase, developing in several building episodes from an initial core to reach their final form. It will be important to identify and respect each phase, and it may be appropriate to keep various phases visible, rather than presenting the building as a single-phase structure.



Above: Barholm Castle, Dumfries and Galloway. While originally a simple rectangular towerhouse, characteristic of lowland Scotland, the moulded window detailing to the later stair tower adds to the castle's historical and architectural interest. These features were successfully incorporated into the residential restoration completed in 2006.



## 4. PLANNING A PROJECT

Effective and informed project management from inception to completion is crucial. It cannot be over-emphasised that projects can founder where the scope of works, their timescale, or their cost, is under-estimated. For example, ruinous structures which initially appear restorable can, after detailed analysis, require major unforeseen capital expenditure to ensure stability.

Rigorous assessment should therefore be undertaken to establish costs based on best- and worst-case scenarios, before making any commitment to start a restoration or consolidation project; to ensure that the project can achieve its aims and be completed.

It is normally helpful to prepare at the outset a feasibility study to consider all the options and demonstrate the sustainability of each. This may lead to a full conservation plan, setting out the background and aims of the work, the planned stages of implementation, and how they will be managed.

Successful consolidation and restoration projects are based on a strong understanding of the castle and its significance. This understanding can only develop through two complementary strands of research: analysing the physical evidence (in the building and surrounding structures and earthworks); and consulting documentary sources



(archive documents, maps and drawings held in local or national resources, and publications).

Any applicant will need advice from appropriate conservation professionals who can help understand and explore the issues. The core team is likely to include a conservation architect, a research team comprising an architectural historian and an archaeologist, a structural engineer, and later a building contractor with appropriate experience. Effective overall project management is also critical, to control co-ordination, delivery of agreed outcomes, the timetable, and costs.

It is always beneficial to undertake early discussions with the planning authority and Historic Environment Scotland. This will clarify what consents are likely to be required and help guide project planning.

If the success of a project is dependent on acquiring grant aid, enquiries at an early stage are essential to establish in principle if this may be available and, if so, its likely extent.

In some cases castles will have lost their ancillary buildings. Many of the courtyards once associated with towerhouses are now gone. A proposal to restore or reconstruct ancillary buildings would need to respect the main building and its historic setting, be of appropriate scale, and take account of impacts on historic fabric both above and below ground. The chosen design may be based on clear historical evidence, or in some cases a modern design distinct from the historic fabric might be appropriate.

If restoration is planned, the installation of services and their integration into the building's structure without compromising its historical integrity should be considered at the early design stage. There will be added costs in bringing services (perhaps over considerable distances). Where rights of access and wayleaves are not included in a property's existing titles, legal advice should be sought.

Applicants should find out about the timescales involved in obtaining statutory consents, which may include planning permission, scheduled monument consent and/or listed building consent. Much is dependent on the individual case and the level of information and research submitted. Lack of detailed information can extend the process. Building warrant relaxations may also be required.

Abandoned, uninhabited ruins often provide habitats for wildlife, which may include protected species. It may therefore be necessary to undertake ecological surveys to establish if this is the case; and, if so, how impacts could be avoided or mitigated, and whether any relevant consents can be obtained. The best source of advice regarding wildlife is [\*Scottish Natural Heritage\*](#).

## 5.Archaeological Excavation and Recording

A castle and its wider site are likely to be archaeologically sensitive, both in terms of building fabric and buried archaeology. The project may reveal – and sometimes destroy – physical remains that can enhance understanding of the site. Therefore, it is important that any such evidence is professionally recorded and the results made publicly available. The findings may also help inform the project's design.

Recognising this, permissions from either Historic Environment Scotland or the local planning authority are likely to come with conditions that require the applicant to commission, and pay for, a programme of archaeological work. This can include survey, excavation, building recording and analysis, and reporting.

Buried archaeology can introduce unexpected costs and delays during site works if the potential is not identified at an early stage. This is best addressed by employing an archaeologist to undertake surveys, recommend mitigation, or trial excavations. However, it is only necessary to excavate areas that would be affected by potential works and it is best practice to preserve archaeological remains intact, wherever possible. By using the results of evaluation it is often possible to adjust plans to reduce or eliminate impact on archaeological remains and the associated costs. At a scheduled monument, impacts on buried archaeology should be restricted to what is demonstrably necessary for the project's completion.

## 6. THE CONSERVATION PROCESS

It is important to consider how new stonework or other materials will interact with the existing structure. New masonry will be visually distinctive at first but may become less so over time. Materials should be sympathetic to the existing structure, but consideration should be given to making new work identifiable on close inspection.

Where carved or dressed masonry around fireplaces, doors or windows is to be installed or replaced, the design for missing parts should be based on evidence from the building itself or archival evidence. Where no such evidence exists, and where appropriate, it may be advisable to aim for clearly identifiable, perhaps simple and/or modern detailing that self-evidently avoids conjecture.

Stone used for repair and restoration should match the colour and weathering characteristics of existing fabric. It is also important to use a compatible lime mortar; cement mortar prevents moisture movement, is hard, cracks, and is usually unsuitable in historic buildings.

Masonry surfaces in castles were often harled, to create a uniform appearance over rubble walls and to provide weather-proofing. Coats of limewash were sometimes applied over the harl, with or without a coloured pigment.

There is ongoing debate over the extent of harling in the past, and a decision on whether to harl should be made on a case-by-case basis, in the light of relevant evidence, and any effect on cultural significance. Harl and limewash can continue to protect against the elements, potentially important in a time of increasing rainfall, but they can also change a building's character and conceal important architectural details. Where harl is to be applied, it is advisable to employ a mason with proven successful experience in harling. Harl, as with limewash, will require regular maintenance.

Timber forms an important part of many structures and, where present, it should be retained as much as possible. Fungal or woodworm decay can be treated, and a well-planned restoration should normally avoid the removal of historic timbers.

The masonry to be consolidated or restored is likely to be saturated and will start to dry out as the project progresses. The client and architect will need to consider this, if they are planning to introduce new timber or plasterwork into the structure.

Whether consolidation or restoration is planned, wall heads and wall walks will require careful weather protection to minimise erosion. Historically, rainwater was usually shed using spouts or overhanging eaves.



However rainwater is managed, it is important to avoid concentrating discharge on one particular area of building fabric or piece of ground near the wall base.

When considering internal changes, the existing plan should be respected wherever possible, for example by using existing door openings.

The installation of services requires careful consideration to minimise the disruption they might cause to both the

thick walls of the structure and buried remains within and around it. Pipes, cables and ducts should pass through existing gaps or spaces as far as possible and should avoid dressed ashlars or other significant features.

Dunollie Castle, Argyll: Built on an earlier fortification by MacDougall lords in the mid-fifteenth century, Dunollie retains many features that are important to understanding both its development and the cultural and architectural environments within Gaelic Scotland at the time it was built. It is a significant landscape feature, and regarded as the Clan MacDougall's ancestral seat. Despite a high level of preservation, consolidation was considered the most appropriate method of ensuring its future preservation. © Dunollie Preservation Trust.



## 7. CONSENTS

Monuments scheduled under the Ancient Monuments and Archaeological Areas Act (1979) require scheduled monument consent for any works.

Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from [\*Historic Environment Scotland's website\*](#).

Listed building consent is required for any work to a listed building affecting its character (see the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997). The local planning authority determines the need for consent and will advise on applications.

Scheduled monument consent and listed building consent do not negate the need for planning permission or building warrants which might be required by the local planning authority.

## 8. SEARCHING FOR LISTED BUILDINGS AND OTHER DESIGNATIONS

You can search for listed buildings, scheduled monuments, battlefields, gardens and designed landscapes on [\*Historic Environment Scotland's website\*](#) (please read the guidelines on the search page). If you are still not sure whether a particular building is designated, you can also email or telephone us for help.

For a map-based search and wider environmental information, including conservation area boundaries, see the [\*Scotland's Environment website\*](#). You can also ask your local authority to tell you whether a building is listed and what is covered by the listing.

## 9. FURTHER INFORMATION AND ADVICE

Historic Environment Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of our roles is to provide advice about managing change in the historic environment.

### Grants

Various bodies award grants towards conservation projects but the competition is usually considerable. Historic Environment Scotland can award a grant under the 'Historic Environment Repair Grant' scheme which helps with the cost of repairs to buildings and monuments. Detailed information on making an application to these schemes should be sought from Historic Environment Scotland.

### Legislation and policy

[\*Buildings \(Scotland\) Act 2003\*](#)

[\*Planning \(Listed Buildings and Conservation Areas\) \(Scotland\) Act 1997\*](#)

[\*Ancient Monuments and Archaeological Areas Act 1979\*](#)

[\*The Historic Environment Scotland Act 2014\*](#)

[\*Scottish Planning Policy \(2014\)\*](#)

[\*Historic Environment Scotland Policy Statement \(2016\)\*](#)

### Further reading

*R Fawcett and A Rutherford, Renewed Life for Scottish Castles, CBA Research Report 165 (York, 2011).*

For the full range of Inform Guides, Practitioners Guides, Technical Advice Notes and Research Reports please see the Publication section of the [\*Historic Environment Scotland website\*](#).

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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

## DEMOLITION OF LISTED BUILDINGS



HISTORIC  
ENVIRONMENT  
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ALBA

APRIL 2019



View of Murraygate, Dundee prior  
to demolition. Titled: 'Mauchline  
Tower, (Old Murraygate)'  
c. 1875 © Courtesy of HES  
(Photograph album 67).





## BACKGROUND

Managing Change is a series of guidance notes produced by Historic Environment Scotland in our role as lead public body for the historic environment. The series supports national level policy for planning and the historic environment. Planning and other authorities should take this guidance into account when making decisions.

Historic buildings enrich Scotland's landscape and chart a great part of our history. They are central to our everyday lives, creating a sense of place, identity and wellbeing. Some historic buildings are designated as 'listed buildings' because they have special architectural or historic interest. You can find out more about listing [on our website](#).

Listed building consent (LBC) is required for any works that would affect the special interest of a listed building. This includes demolition. It is a criminal offence to carry out such work without consent. The LBC process is normally administered by planning authorities. Historic Environment Scotland is a consultee for the demolition of any listed building. All of the details of our role in both LBC and conservation area consent are set [out on our website](#).

[Scottish Planning Policy](#) states that 'listed buildings should be protected from demolition or other work that would adversely affect it or its setting' (paragraph 141). [Historic Environment Policy for Scotland](#) outlines the key policy considerations for making decisions about works that affect listed buildings:

### HEP2

Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.

### HEP4

Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

### The Planning (Listed Buildings and Conservation Areas) (Scotland) 1997 Act 'The 1997 Act'

Demolishing a listed building should be avoided wherever possible. [The 1997 Act](#) requires that special regard be given to preserving listed buildings and their settings when making decisions on LBC applications. There is a strong presumption in favour of retaining listed buildings. Applications to demolish listed buildings should be refused unless their loss has been fully considered and justified.

## DEFINITION OF DEMOLITION

In this context, demolition means the total or substantial loss of a listed building. A listed building can be any built structure. Although the 1997 Act and this document use the term 'building', the phrase can apply to things like bridges, lamp posts and phone boxes, too. Even if part of a building is to be retained (such as in façade retention), a proposal may still be considered demolition. This would be the case if the proposed works would result in the loss of the majority of the listed building.

The removal of smaller parts of a building, such as conservatories, porches, chimneys and small scale extensions, should be assessed as alterations rather than demolition. In more complex cases, where alterations involve the loss of large amounts of fabric, planning authorities may need to consider in more detail whether works are classed as demolition. This should happen as early as possible in the process so that the planning authority can identify the relevant policies and guidance.



View of central block during demolition of  
Royal Infirmary, Edinburgh.  
Titled: 'Edinburgh Infirmary' c.1884  
© Courtesy of HES.



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## HOW TO USE THIS GUIDANCE

This guidance should be used when the future of a listed building is uncertain and demolition is being considered as an option. Because of the strong presumption in favour of retaining listed buildings, the decision to demolish a listed building is a last resort. It will almost always be made at the end of a process that has considered and discounted all other feasible options.

There will be some exceptional circumstances where the demolition of a listed building can be justified. This document provides information and guidance that will be a key consideration in such cases. It is most relevant to owners, their agents, and those making decisions on LBC applications for demolition. It should inform:

- The approach of owners

[The accompanying Managing Change in the Historic Environment: The Use and Adaptation of Listed Buildings](#) provides guidance on different approaches to reusing listed buildings. It should be read alongside this guidance when considering the range of potential options for listed buildings. If the owner decides to submit a LBC application for demolition, pre-application discussions are strongly encouraged.

- Decisions on listed building consent (LBC) applications for demolition

The planning authority should identify which national and local planning and historic environment policies they will use to assess an application at the earliest possible stage. They should give clear advice to the applicant on what supporting information will be required. They should also involve us at an early stage.

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## WHAT TO CONSIDER FIRST

If one of the following situations applies then the loss of a listed building is likely to be acceptable, as long as this is clearly demonstrated and justified. The supporting information expected to justify demolition under these situations is specific to each.

### IS THE BUILDING NO LONGER OF SPECIAL INTEREST?

In some circumstances a listed building may no longer be of special architectural or historic interest. This might include where there has been a significant loss of fabric or features of interest, or where there have been later alterations which have affected the character of the building.

Where the case for demolition rests on this factor, owners should ask us to review the listing to determine if a building is still of special architectural or historic interest. This review should happen before an application for demolition is submitted.

Further information on the process of proposing a building for listing, or requesting a review of a listing is available on [our website](#). For an individual building, we aim to complete a review within six months. We recognise that some reviews will require a quicker response. We will consider requests for a shorter time period on a case by case basis. We may be able to give an initial view of the special architectural or historic interest of the building in a much shorter time, particularly if it no longer meets the criteria for designation. The more detail you give us when asking for the review, the quicker we can assess your proposal.

LBC is not required for demolition of a building which has been de-listed. However, local planning policies may still require the cultural significance of an unlisted building to be taken into account. If the building is located within a conservation area, conservation area consent will be required. This is a separate process from LBC and is also administered by planning authorities. The conservation area consent process focuses on considering the building's contribution to the character and appearance of the conservation area.



Demolition work in progress after the Arnott Simpson fire, Argyle Street, Glasgow, 1951 © Newsquest (Herald & Times). Licensor [www.scran.ac.uk](http://www.scran.ac.uk).

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## IS THE BUILDING INCAPABLE OF MEANINGFUL REPAIR?

Most traditionally-built buildings, even those in an advanced state of decay, can be repaired.

There are occasions when repairing and reusing a listed building would lead to extensive loss or replacement of fabric, which would have a consequent effect on its special interest. If repairing a building cannot preserve its special interest, it is not capable of meaningful repair.

Instances where meaningful repair might not be possible include where the building has inherent design failures, or where a timber structure has decayed so much that no original material can be saved. It would not be possible to meaningfully repair a building where there is structural damage that cannot be repaired without complete reconstruction – such as serious corrosion of reinforced concrete frames, or extensive damage to the building.

This issue is separate to that of the economic viability of any repairs, which is considered below.

If an LBC application is submitted arguing that a building is incapable of meaningful repair, supporting evidence for this will need to be provided. This should include a full condition assessment by appropriately qualified and experienced professionals, and a statement placing the condition assessment in context of the building's significance.

## IS THE DEMOLITION OF THE BUILDING ESSENTIAL TO DELIVERING SIGNIFICANT BENEFITS TO ECONOMIC GROWTH OR THE WIDER COMMUNITY?

Some projects may be of such economic or public significance that their benefits may be seen to outweigh the strong presumption in favour of retaining a listed building. Often these projects form part of wider strategies at national or regional level. Examples may include major transportation schemes or significant regeneration projects.

An LBC application for demolition on these grounds should provide evidence to demonstrate why the loss of the building is essential in order to obtain these benefits. It should make clear why these, or similar, benefits cannot be achieved with retention of the building. Supporting evidence should also include a detailed assessment of the likely benefits of the proposed project. If the works form part of a wider strategy, the application should explain why the strategy is significant at a national or regional level.

If the proposals involve a new development on the site, planning permission for the replacement development should be demonstrated as being in line with local and national policy. Unless this can be done, there is no certainty that planning permission will be achievable. This would make it impossible to ensure that the benefits were going to happen, and the demolition would therefore not be justified.



## ECONOMIC VIABILITY

In some instances the repair and reuse of a listed building is not economically viable. This means that the cost of retaining the listed building would be higher than its end value. Where the cost of works is higher than the end value, the difference is referred to as the 'conservation deficit'.

The principle of demolition should only be accepted where it has been demonstrated that all reasonable efforts have been made to retain the listed building. The efforts made should take into consideration the special interest of the listed building.

The accompanying [Managing Change in the Historic Environment: The Use and Adaptation of Listed Buildings](#) provides more detailed advice on how reuse of a listed building can be achieved. This includes undertaking pro-active marketing measures.

Marketing should be undertaken in an open and transparent manner before a final decision is taken on making an application for demolition. In certain cases its marketing should continue when a LBC application has been submitted.

Marketing is necessary to demonstrate that every effort has been made to secure a buyer who would retain the building.

Marketing should make clear that the building is listed. It should include a development brief if possible, as this helps to maximise the possible opportunities for retaining the building. The process should also involve specific marketing to groups or individuals with a track record in restoration, such as Building Preservation Trusts.

A building should be marketed to potential restoring purchasers for a reasonable period, at a price reflecting its location and condition. This should normally be at least six months, although in some circumstances a longer or shorter time period may be appropriate. The price should be its current market value and should not take account of any historic purchase price.

The marketing price should not be defined by the value of the land without the building, even if this might be higher, because that would assume demolition will take place.

## COMMUNITY OWNERSHIP

Concern for the future of an unused listed building may result in a community effort to take over ownership. A range of options exists, and might include:

- working in partnership with the owner
- leasing the building
- negotiating a private sale
- purchasing on the open market

Community Right to Buy (CRtB) now allows communities throughout Scotland to register an interest in land and the opportunity to buy that land when it comes up for sale. Further information on CRtB can be found on the [Community Ownership Support Service website](#).

In some circumstances the price may be a nominal sum. It is important to note that whilst a building may be marketed at a low value (in some cases as little as £1), this should not be seen as a reflection of its special interest. It is only a reflection of the extent of the conservation deficit together with the strong presumption in favour of retaining the building.

The justification to demolish a listed building on economic grounds will not rest solely on marketing. The decision to demolish is normally at the end of a process where an owner has considered the viability of alternative options. A financial assessment should demonstrate that the other options were not economically viable. It should include a detailed assessment of costs, including developer profit, as well as the likely value of the completed project or projects.

The details of the marketing process and financial assessment (or viability assessment) should form part of the material submitted to the planning authority as part of an LBC application. The planning authority should verify the information provided by reviewing the assumptions and allowances within the financial assessment.

The marketing information should outline the steps taken by the applicant to market the building, detail any interest shown, and explain why this did not result in any credible offers.

The applicant should also show that there is no other way of financing the project, through funding sources such as enabling development, or grant aid.

Some buildings or structures are of historic or architectural interest but have more limited scope for reuse. Bridges, dovecots, statues and lampposts are all examples of structures that may have limited options for reuse. Consent for demolition of such structures should not normally be given on the grounds of economic viability alone. The main factors in these cases are likely to be the special interest of the listed structure, its condition, the likely availability of funding, and whether marketing to repairing purchasers is a realistic option.



The demolition of the Grosvenor Hotel, Glasgow, after a fire in 1978  
© Newsquest (Herald & Times).

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## CURTILAGE

Structures within the curtilage of a listed building, even if they are not fixed to it, may be included in the listing. For example, a country house might be named in the statutory address, and structures such as boundary walls, gateways or stable blocks may not be named or described in the listed building record, but are often part of the listing. It is a role of planning authorities to decide whether structures within the curtilage are listed.

Decisions on demolition of curtilage listed structures should primarily be based on their contribution to the special interest of the listing. Where a building makes a significant contribution to the character, appreciation or understanding of the main subject of the listing, the principles of this guidance apply.

If part of a building is not listed, both the statutory address and the statement of special interest in the listed building record will state that it is excluded. The statement will use the word 'excluding' and quote the 1997 Act. Some earlier listed building records may use the word 'excluding', but if the Act is not quoted, the exclusion carries no legal weight.

## RECORDING

Owners and developers should carry out detailed recording of all listed buildings when fundamental changes are proposed. If LBC is granted for demolition, there is a separate requirement under [Section 7 of the 1997 Act](#) to give us an opportunity to carry out recording for the public record. Planning authorities may have separate requirements for recording.

## SALVAGE

The salvaging of historic features and material does not justify demolition or form part of the justification. But if LBC is given for demolition, opportunities for salvage should be considered. Salvaged materials and features can make a significant contribution to the repair and maintenance of historic buildings.

Often it will be possible to re-site salvaged features, such as decorative stone doorways, plaques, or other fixtures and fittings within a redeveloped site. Likewise, salvaged materials may be reused to the benefit of the scheme, such as stone boundary walling.

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## SOURCES OF FURTHER INFORMATION AND GUIDANCE

### Legislation, strategy, policy and procedure

[Our Place in Time:  
The Historic Environment  
Strategy for Scotland](#)

[Historic Environment Scotland:  
Designation Policy and Selection  
Guidance](#)

[Historic Environment Circular:  
Regulations and Procedures](#)

[Planning \(Listed Buildings and  
Conservation Areas\) \(Scotland\)  
Act 1997](#)

### Guidance

[HES Use and Adaptation of  
listed buildings](#)

[HES Use and Adaptation of  
listed buildings  
case studies](#)

[Managing Change in the Historic  
Environment guidance series](#)

[HES Technical advice notes  
\(TANs\), Short Guides, Inform  
Guides, and Practitioners Guides](#)

[Scottish Government Planning  
Advice Note \(PAN\) 71:  
Conservation Area Management](#)

### Online resources

[Historic Environment Scotland  
website](#)

[Designation records  
and decisions](#)

[Buildings at Risk Toolkit](#)

[HES role in Listed building  
consent and Conservation area  
consent](#)



Front cover image:

The remains of the clock tower at the Chancelot Mill in Leith, Edinburgh in July 1972  
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# Doorways



October 2010

# Key Issues

- 1. The doorway and associated features of a historic building, or groups of historic buildings, form important elements in defining their character. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area.**
- 2. Age, design, materials, and associated features are amongst the numerous factors that contribute to the interest of historic doorways.**
- 3. In planning works to doorways it is important to understand and protect their key characteristics.**
- 4. Maintenance and repair is the best means of safeguarding the historic character of a doorway. This also reduces the requirement for new raw materials and energy.**
- 5. Where elements of a doorway cannot be repaired, the replacements should match the original design as closely as possible.**
- 6. Significant improvements in energy efficiency can be achieved by discreet draught-stripping.**
- 7. Planning authorities give advice on the requirement for listed building consent, planning and other permissions.**

## 1. INTRODUCTION

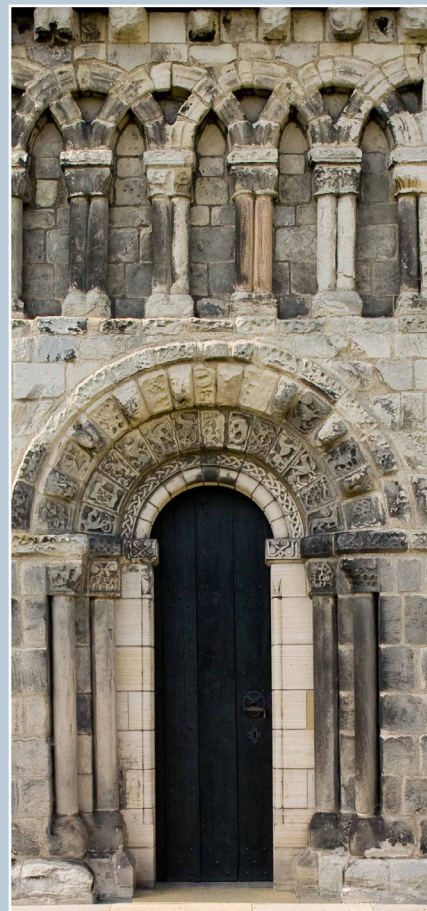
- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to altering the doorways of historic buildings. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K).
- 1.4 Separate guidance in this series is provided on improving accessibility.

## 2. WHY ARE HISTORIC DOORS AND DOORWAYS IMPORTANT?

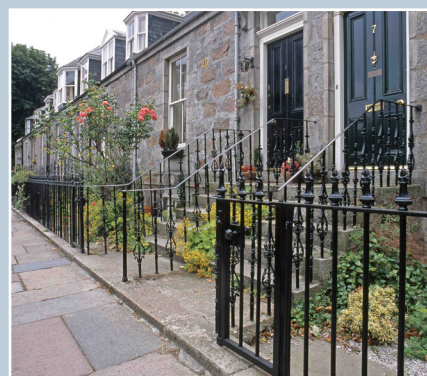
- 2.1 Doorways, and their associated features, such as entrance steps and platts, make a substantial contribution to the character and physical integrity of most historic buildings. They are usually an important element of a building's design, weatherproofing and security: their style, detailing and fixtures help us to understand when a building was constructed or altered, and how the building was used. The design and arrangement of doorways can be a notable component of groups of buildings or streets. Doorways can have symbolic or ritual importance. Many historic doors are extremely durable, remaining in use for a century or more.

## 3. IDENTIFYING THE INTEREST OF HISTORIC DOORS AND DOORWAYS

- 3.1 The significance of a historic doorway is derived from a number of factors. This includes its form or shape, the pattern of design, the materials and details of construction, the finish, the method of opening, the use of fanlights and glazing. Associated fixtures and features such as fanlights can also be significant.



*The exceptional 12th-century Romanesque doorway at Dalmeny Parish Kirk. Like many early church doorways, it is decorated with symbolic carvings. The door and inner stone frame are 20th-century replacements. © N.Haynes.*



*Albert Terrace, Aberdeen, designed by the architect Archibald Simpson in about 1840. The paired doorways form part of a consistent architectural pattern throughout the terrace of houses. Additional features include the steps and decorative iron railings.*





*The doorway, with its stair, stone surround, decorative fanlight and heraldic panel, is the principal feature of this symmetrically designed Ross-shire house of 1760. © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*



*Sliding boarded doors on a late 18th-century granary building in Banff, Aberdeenshire. © N. Haynes.*



*A late 19th-century two-leaf outer door and an inner vestibule door with decorative leaded glass panels in Falkirk. Associated fixtures include the brass letterbox and door handle on the outer door and the brass doorknob and decorative finger-plate on the inner door. © N. Haynes.*

## Forms of doorway

- 3.2 There are many shapes and sizes of historic doorway, from simple rectangular openings to elaborate types of arch and surround. Typically doorways are carefully sized and located as part of a broader design for a building or group of buildings. Doorway proportions and spacing frequently relate to other elements of the building, such as the overall proportions of an elevation or other features (e.g. windows). Doorways are often important components of an architectural design, perhaps expressing different parts of a building through variations in size, positioning and design.

## Door materials and design

- 3.3 The materials and construction of doors can reveal much about local joinery traditions and stylistic fashions of the period and the historical status/use of the building. The predominant material of traditional historic doors and frames is timber, usually painted pine or oak.
- 3.4 The simplest historic doors are of vertical timber board construction. Early improvements in security resulted in some doors of more complex construction that incorporated metalwork to achieve their strength and decorative qualities. Variations on the boarded design were popular into the early 20th century.
- 3.5 Panelled timber doors were in common use on important buildings by the late 17th century. Throughout the 18th and 19th centuries the various forms of panelled door became standard for the main entrance of most types of domestic building.
- 3.6 Apart from iron 'yetts', or security gates, early metal doors are rare. The early 20th century saw an increasing use of metal or metal-framed doors, particularly alloys such as bronze.

## Method of opening

- 3.7 As a moving component of a building, a door can impact on the appearance of a building in both its open and shut positions. The method and direction of opening are important characteristics of a historic door.
- 3.8 There are three principal methods of opening: side hung, sliding and revolving. The opening methods are usually appropriate to different types of building, e.g. revolving doors are usually found on civic buildings. Most domestic side-hung doors open inwards from the outside, but some specialised situations, for example in agricultural or industrial uses, require outward-opening doors. Some doors are divided vertically to form two-leaf doors (hinged on both jambs of the doorway, opening at the centre), and some are divided horizontally (e.g. a stable door).

### Fanlights and glazing

- 3.9 Glazed features frequently form part of the design of historic doorways. The introduction of glass fanlights above doors in the 18th century and ornate glass panels within doors in the 19th century increased the decorative possibilities of doorways whilst also admitting more daylight.

### Finish

- 3.10 From the 18th century most timber doors were treated with a durable paint finish. Doors on a single building or groups of buildings (e.g. country estates) were often painted a uniform colour. It is sometimes possible to sample underlying layers to establish previous colour schemes.

### Associated fixtures

- 3.11 Door furniture often reflects the period and character of a building, from simple iron handles and latches on a cottage door to elaborate strap hinges on a church door. The range of door fixtures is enormous: whilst some are of unique artisan creation, the use of uniformly produced brass door furniture can be an important element of an area's architectural character. Historic door-bells, brass plaques and other fixtures into the surrounds of a doorway can equally contribute to the character of the entrance.

### Associated features

- 3.12 The treatment of an entrance can make a powerful statement about the status of the building or elevate one entrance over others in the same building. The construction of entrance steps and platts to tenements and houses from the 18th century allowed the creation of basements and the regular spacing and positioning of doorways, even where ground levels varied. Heraldic panels, pediments, doorcases, porches, porticos, and porte-cochères (carriage porches) are among the many other features associated with entrance doorways.

## 4. GENERAL PRINCIPLES FOR REPAIR AND ALTERATION

### Character and interest of the building

- 4.1 Repairs and alterations to a historic building must protect its character. The contribution of the doors and doorways to that character must therefore be understood before considering how to alter the building. The form, pattern of design, materials and details of construction, finish, method of opening, use of fanlights and glazing, associated fixtures, and associated features are all important considerations. A brief description of the interest of the doors or doorways and an explanation of the impact of the alterations are always helpful in assessing such proposals.



*Detail of a delicate cast-iron fanlight dating from the 1790s in Edinburgh.*  
© N. Haynes.



*Associated fixtures (clockwise from top left): tenement door release (1890s); brass handle and lock (1880s); door-bell (1890s); door-bell pulls (1820s).* © N Haynes.





*Removal of the left-hand doorcase has unbalanced this pair of entrances. © N. Haynes.*



*Glazed upper panels form an original feature of this Glasgow tenement door. © N. Haynes.*



*The door on the left is redundant following the internal amalgamation of two villas, but retained in place to maintain the character of the building. © N. Haynes.*

## Repair

- 4.2 In almost all cases, repair of components on a like-for-like basis is preferable to replacement of whole units, as this will best maintain the character and historic fabric of the door or doorway. More detailed advice on the repair of traditional timber doors and glazing can be found in *Historic Scotland's Inform Guide: External Timber Doors* and *Inform Guide: Decorative Domestic Glass*.

## Replacement

- 4.3 Where there is no alternative to the replacement of an original or historic door, the new elements should match the original in all respects. This should include exact replication of the opening method, maintenance and reuse of door furniture and historic glass where this contributes to a building's character. Proposals to recess a door either less or more deeply within the door opening should be refused.
- 4.4 Replacement doors may be appropriate where woodwork is beyond repair or in instances where historic doors have previously been replaced using inappropriate designs or materials. Any new replacement proposals must seek to improve the situation through designs and materials that are sympathetic to the character of the building.
- 4.5 Replacement doors which are made of hardwood with a stained or varnished finish, and those which introduce asymmetrical elements, integral fanlights, inappropriate glazing or panelled patterns are rarely appropriate.

## Glazing

- 4.6 Glass can make an important contribution to the character of a doorway and should not be removed. Plain, opaque, stained and patterned glass are important details, whether part of the door, fanlight or sidelight. Where replacement is required, new work to match the original should be specified.

## New doorways

- 4.7 New doorways in historic buildings should only be considered where they can be incorporated into the existing architecture and designed and detailed in a way that is compatible with the existing historic fabric. Great care should be taken to retain existing design patterns, symmetrical elevation or architectural details. Doors on new small-scale extensions are usually best designed to match those of the main building.

## Blocking up doors

- 4.8 The character of a listed building is usually best maintained by retaining redundant doors in situ rather than blocking them up. If they are part of a terrace of uniform design they are a particularly important element of the architectural character and can normally be fixed closed in a manner that is reversible.

### Converting doors to windows

- 4.9 Conversion of doors to windows is usually difficult to achieve without disruption to the architectural character of the building. Such alteration work should only be considered in subsidiary locations and where it will not involve the loss of historic fabric of quality. In these locations it is sometimes possible to glaze the upper part of the existing door to allow the necessary light.

### Reinstatement

- 4.10 Generally, restoration of a door or doorway to a particular period should only be considered when the proposed style is appropriate to the building in question, it matches a documented earlier pattern, and it does not result in the loss of existing historic fabric that contributes to the character of the building.

### Security

- 4.11 Additional security measures can normally be incorporated without affecting the character of a door. Extra mortice locks, rimlocks or bolts are usually easy to fit. Permanent external security shutters or roller shutters should not be used as they are likely to damage or obscure architectural detailing.

### Colour

- 4.12 Many manufacturers produce ranges of traditional paint colours that are suitable for use on historic buildings. Where consistency of colour with other features (e.g. windows) is important to the character of the building, this should be maintained in any redecoration scheme. Wood stain and varnish are not usually appropriate finishes. The choice of paint colour may be subject to Local Authority conditions.

### Alterations to fixtures

- 4.13 Metal door furniture is an important feature of a historic door. Historic ironwork and brasswork should be retained and reused if the timber door is being replaced. Replacements, where necessary, should match historic details, materials and positions.

### Alterations to associated features

- 4.14 Alterations to associated features must seek to maintain their character. Enclosure of open features, such as a portico or the space beneath an entrance platt, to create additional internal space should not be undertaken. Steps, platts and flyovers should always be retained.

## 5. ENERGY EFFICIENCY

- 5.1 Energy conservation is necessary in addressing climate change. In many cases cost-effective and sustainable improvements to the energy efficiency of traditional buildings can be achieved without damage to their character. Heat loss typically occurs in



*The old conversion of the right-hand doorway to a window and removal of the main entrance steps is disruptive to the character of the building and the broader pattern of entrances and windows in the street. © N. Haynes.*



*Dawyck Stables, Bellspool, Scottish Borders, before conversion.*



*Dawyck Stables, Bellspool, Scottish Borders, after conversion. The original door opening has been retained, but glazed to allow for residential use.*





A timber panelled door in the Seatown at Cullen, Moray. The detailing of this door is typical of the high-quality joinery of the area. Draught-proof strips have been applied around the door.  
© N. Haynes.

various parts of a building. It is important to take an overall view of energy efficiency measures.

- 5.2 It is normally possible to upgrade thermal performance of doors, for example by the introduction of discreet draught-proofing strips. In some cases, where the panels are particularly thin, thermal performance can be improved by adding a layer of insulation to the indoor side.
- 5.3 Further information is available in Historic Scotland's *Inform Guide: Energy Efficiency in Traditional Homes*, which gives further examples of measures that can be taken to improve energy efficiency.

## 6. CONSENTS

- 6.1 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 6.2 Planning permission may be required for works to unlisted buildings in Conservation Areas. Where consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and the proposed works in context. It is normally helpful to provide detailed technical information and photographs. A brief description of the interest of the door and an explanation of the impact of the alterations are always useful in assessing change.

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

Historic Scotland  
Longmore House  
Salisbury Place  
EDINBURGH  
EH9 1SH

Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

## Other selected Historic Scotland publications and links

[Maintaining your Home – A Short Guide for Homeowners](#) (2007) (PDF 1.4MB)

*Inform Guide: Energy Efficiency in Traditional Homes* (2008)

*Inform Guide: External Timber Doors* (2008)

*Inform Guide: Decorative Domestic Glass* (2007)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.

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[www.historicscotlandimages.gov.uk](http://www.historicscotlandimages.gov.uk)

### Cover images (all © N Haynes)

*Cottage door, designed by James Maclaren, 1889, Fortingall, Perth & Kinross.*

*A 'Gibbs' architrave surrounding a late 18th-century doorway in South Street, St Andrews, Fife.*

*Decorative door handles at the former Barony Church, Castle Street, Glasgow, designed by J Burnet & J A Campbell, 1886–90.*

Managing  
Change  
in the Historic  
Environment



# Engineering Structures



October 2010

# Key Issues

1. Historic structures and works of civil engineering are often of significant architectural and historic interest in their own right. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area. Scheduled monument consent is always required for works to scheduled monuments.
2. Works to historic engineering structures must be based on a thorough understanding of their design, construction and use of materials. This is likely to require the involvement of structural engineers and others with relevant experience of dealing with such structures.
3. Where remedial or strengthening works are found necessary, they must:
  - be in sympathy to the way that structure performs;
  - restore the structural strength and extend its life.
4. Existing materials should be replaced only where essential to structural stability or other safety-related issues, and where the consequences of that intervention are understood. In general, existing material should be retained and augmented, rather than replaced, by new construction where stability or other safety-related issues are of concern.
5. Some structures may not have an obvious alternative use, but should nonetheless be retained to give a sense of place to a development.
6. Planning authorities give advice on the requirement for listed building consent, planning and other permissions.



## 1. INTRODUCTION

- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to alterations to structures and works of civil engineering. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K).

## 2. WHAT ARE ENGINEERING STRUCTURES?

- 2.1 Scotland's industrial heritage is evidenced by our engineering structures. These include a wide variety of types and forms, such as bridges, tunnels, aqueducts, railway viaducts, harbours, canals and lighthouses. In many cases they can include individual structures as well as associated features, like railings, lamp-standards, breakwaters, lock-gates, machinery and fog horns.
- 2.2 Many buildings, such as mills, factories, warehouses and railway stations also contain historic structural engineering.

## 3. WHY ARE ENGINEERING STRUCTURES IMPORTANT?

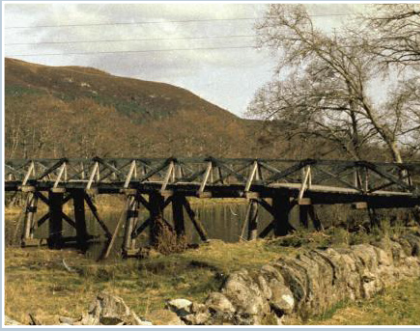
- 3.1 Historic engineering structures make a major contribution to Scotland's historic environment. As well as contributing to town and landscape, they also illustrate advances made in communications and technology over time.
- 3.2 The wider context can also be of significance, for example the relationship of a structure to a larger group (e.g. a railway bridge is, or was, usually part of a group of structures along a line or network).



Aberfeldy Bridge, Perth & Kinross, showpiece of General Wade's military road network, combines cutwaters with neo-classical quoins and obelisks that signal the springing point of the arch. © Crown copyright: RCAHMS.  
Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).



Cox's Stack: a 90-metre-high sentinel over Camperdown Works, Dundee, 1865. Red and white polychrome brick was popular in industrial buildings from 1860 to 1880.



*This bridge at Garve, Highland, is one of only four of its type to survive. Built during the late 19th century, the bridge is of timber trestle construction, and consists of eight spans, with six main truss spans. © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*



*Vertical coursed masonry at Pittenweem Harbour, Fife. © N Haynes.*



*Girdleness lighthouse, Aberdeen, 1833, has typical keepers' houses, flat-roofed to emphasise the height of the tower, a compressor house and foghorn. A radio mast makes it a key part of the UK Global Positioning System (DGPS) and is not out of place.*

## 4. IDENTIFYING THE INTEREST OF ENGINEERING STRUCTURES

- 4.1 Engineering structures encompass a very wide variety of types and forms. While this list is not exhaustive, the examples below indicate the elements of interest that are likely to contribute to character across a range of types.

### Historic bridges

- 4.2 As well as being used for communication, bridges can be major architectural features in a town or landscape. Elements such as parapets, refuges, balustrades, railings, lamp-standards and plaques and historic road surfaces can all contribute to the character of a historic bridge.
- 4.3 The materials used, such as timber, stone, brick, iron, steel and reinforced concrete are also of interest and can be important to the history of engineering.

### Harbours, piers, docks and ferry slips

- 4.4 Scotland's numerous harbours, docks and ferry slips show evolution in engineering technology as well as the nation's major maritime heritage. Historic fabric will often be important in showing the development of these structures. The coursing is often vertical in early harbours and wooden wedges might be used to give some resilience to wave action.
- 4.5 Associated elements, such as swing bridges, harbour lights, cranes, and hydraulic mechanisms can also give special interest to the character of a harbour.

### Canals

- 4.6 All the major sea-to-sea (Crinan, Caledonian, Forth and Clyde) and city-to-city (the Union) canals are scheduled monuments, and buildings associated with them may be listed. Associated elements, such as a stable, bridge or towpath sign may also contribute greatly to the cultural value of the route as a whole.

### Lighthouses

- 4.7 Lighthouses are designed to withstand inhospitable environments and were the pinnacle of structural engineering of their day. They made use of materials and techniques, such as interlocking masonry, Portland cement and coatings not usually found on stone buildings. Many were painted distinctively to make them prominent during the day.
- 4.8 Related details such as the lenses, the lanterns, the fog horn and associated compressors, and associated curtilage buildings all add to the interest of the structure.

### Water, gas and power infrastructure

- 4.9 Water towers can be distinctive landscape features and associated water supply infrastructure can often form a linear



'Heritage Corridor'. The water might be gathered for a power system, such as the Greenock Cut or a hydro-electric power station, or to feed canals or provide a city with its water needs. This was key to the expansion of Scottish cities. It is possible that items of infrastructure that are ancillary to the main object of listing could be considered to fall into its curtilage.

- 4.10 Structures related to gas supply can also be significant, in particular those such as gasometers.

### **Chimneys and tall structures**

- 4.11 Tall structures can symbolise an industry and give a sense of place to a locality. The headgear of a coal mine, or the cantilever crane that installed marine engines into ships, may project a monumental value to a community.
- 4.12 Chimneys also stand out as symbols of industry, including agriculture, and often make a major contribution to a skyline.

## **5. GENERAL PRINCIPLES FOR ALTERATIONS AND REPAIRS**

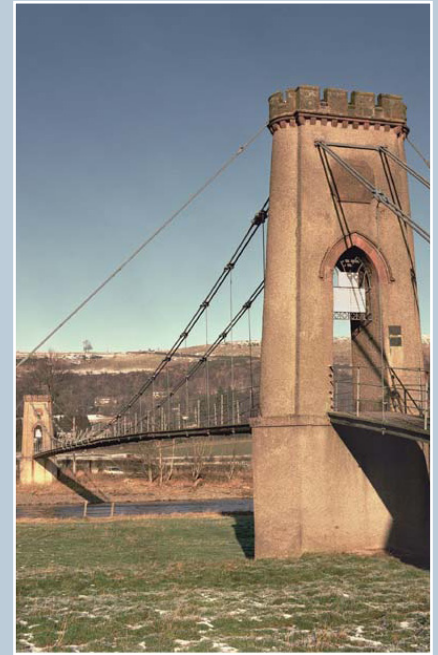
- 5.1 This section deals with general principles that relate to all engineering structures. However, given the variety of these, some structures are dealt with in more detail than others. Traditional structures will often require traditional repair techniques and appropriate technological advice should be sought from relevant professionals.

### **Character and interest of the structure**

- 5.2 Alterations and repairs to historic engineering structures must protect their character and special interest. That character must therefore be understood before any intervention is made. Documentary research and fabric analysis can be useful in understanding the design and material properties of engineering structures.
- 5.3 High importance is attached to historic fabric when it conveys information about how it was created and how it performed. In other cases the aesthetic form might justify a higher degree of intervention to restore that form or to help it perform a useful function that does not conflict with its historic significance.

### **Maintenance**

- 5.4 Regular inspection, maintenance and appropriate repair are essential to maintaining the structural and visual integrity of engineering structures and their associated features.
- 5.5 Structures such as lighthouses were often painted in distinctive ways and the continuance of this practice is part of regular maintenance. Cast-iron structures and fixtures also require a regular schedule of painting to prevent corrosion, while other



*Gattonside suspension bridge, Melrose, Scottish Borders, 1826, photographed in 1991 before reconstruction work. © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*



*The same bridge at Gattonside after its reconstruction in 1991–2. The parapet of the same bridge is so straight that it now acts as a girder. Chains and connections are much heavier and while some fabric has been retained its character is compromised.*



*Manse Basin on the Union Canal at Linlithgow, West Lothian, which following the completion of the Millennium Link, is seeing increasing leisure uses alongside and on the canal. Certain works of maintenance to scheduled canals is covered by a class consent. © N. Haynes.*



*Moy Viaduct, Inverness.*



*Union Bridge, Scottish Borders, 1821, the oldest suspension bridge still carrying a road, showing a clear distinction between the historic chain links and a 1920s wire cable. The deck is wooden and the parapets do not conform to modern standards. A weight limit and bollards exclude heavy vehicles.*

types of metal may require different maintenance regimes, plus periodic assessment of their structural strength.

- 5.6 Regular maintenance and inspection is particularly important for structures that are still in use, such as moveable bridges and canals. Although most Scottish canals are scheduled monuments, maintenance agreements can be agreed with Historic Scotland to allow certain repairs to be carried out without the need for individual consents.

### **Repair**

- 5.7 The character and historic fabric of an engineering structure is best maintained by repairing components on a like-for-like basis. Any damaged, decayed or missing item should be repaired or replaced in its original form and material. Substitute materials are seldom visually successful and may harm structural performance.
- 5.8 Many engineering structures were constructed using iron and steel. Work to these structures must respect and retain as much as possible of the original material. Here the actual fabric of blacksmiths' work may be central to the character of the structure.
- 5.9 Stone repairs should retain as much as possible of the original stonework and surfacing. Stone or brick strength, colour, tooling, coursing and jointing should be carefully matched in any new work and pointing and grouting should be undertaken with the greatest care. Any new pointing to stone or brick structures should match the strength, colour and finish of the original.
- 5.10 Timber repairs may be necessary to structures such as historic timber bridges. As survival of these structures in their original form is rare, any repairs should be carefully considered and sensitively carried out.
- 5.11 Reinforced concrete is prone to decay from carbonation or from insufficient cover to the reinforcement. Repairs must pay attention to the architectural form and finish. Patch repairs, cutting back the defective concrete, are normal. Sprayed repairs suit some concrete bridges but risk changing the profile of details like balusters.
- 5.12 Some highly decorated items of engineering structures are also functional. For example the top cornice, or 'oversailer' for smoke dispersal, on chimneys. This needs to be considered in any scheme for repairs.

### **Replacement of parts**

- 5.13 Historic fabric will often be important in showing the evolution of engineering technology, but it is equally important to achieve continuation of use, which means honestly expressed new work as well as appropriate repairs. Where structural integrity is compromised and there is no alternative to the replacement of



original parts of a structure, the new elements should match the original.

- 5.14 A moveable bridge, for example, may justify some replacement of parts in order to stay in use and sustain the significance of the bridge. The continuing operation of a dock or canal lock may also be a supporting factor in the case for renewal of elements such as lock-gates. Particularly important historic gates might then be displayed nearby, if shown not to be reparable to working order.

### Reinstatement

- 5.15 Generally, reinstatement of an element of a structure should only be considered where documented evidence of the original exists and reinstatement will not result in the loss of existing historic fabric that contributes to the character of the structure. Appropriate examples may be where replacement parapets or lamp-standards on bridges are out of character with the original design, or where there is evidence of an early or original decorative colour scheme.

### Reinforcement and strengthening

- 5.16 Where reinforcement or strengthening is unavoidable, a solution which causes the least structural and visual damage must always be sought. Propping or strengthening a structure should only be considered as a short-term solution.
- 5.17 Within stone structures, such as an arch, distortions may have long settled into place, and form part of the character. Unless proven to be an ongoing problem, the distortion should stay rather than be corrected. Tests to destruction have often shown that assessed loads are far below actual loads at which the structure failed.
- 5.18 The use of carbon fibre to replace or strengthen missing material in a steel or iron structure is sometimes a minimal intervention option. Plate bonding can also add security to the underside of arches and girders.

### Infilling

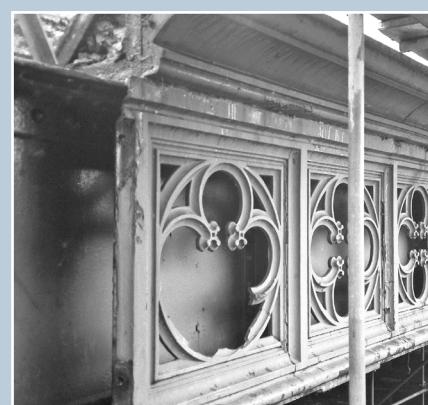
- 5.19 Stone arched bridges were sometimes designed to include voids to lighten loads and allow internal inspection. Inappropriate infilling can have both an aesthetic and structural impact that would be undesirable.
- 5.20 The infilling of wet or dry docks or the removal of dock gates would impact badly on the character of a dock, even if carried out reversibly with a loose fill.

### Widening of bridges

- 5.21 Where the widening of a bridge may have an unacceptable impact on its character, it may be better to route a second bridge alongside to carry some of the traffic, still leaving the old bridge. Careful removal of previous widening may enhance its appearance.



*Carron Bridge, Moray, 1863: a railway bridge that is now a road bridge. An application to build a new steel arched bridge, and fix the outer cast-iron ribs to it, was withdrawn after it was found by calculation at a public inquiry to be unnecessary. The cross spandrels read through from side to side, so facadism was not going to work visually.*



*Dalmarnock Bridge, Glasgow, is a series of wrought iron girders behind a gothic cast-iron panel. It was strengthened in 1996 by insertion of new steelwork. The repaired cast-iron parapet is protected from traffic by bollards.*



*Stow Packhorse Bridge in the Scottish Borders has been retained although it is now redundant.*



*Graving (dry) Dock in Dundee. The port function has changed to a big mixed use development steered by a conservation plan required as a condition of planning permission.*



*Perth Water Works, now converted for use as the Fergusson Gallery, has a cast-iron cistern made in 1832 that has recently been refurbished.*

## Parapets

- 5.22 Parapets may need to be protected against the possibility of vehicle accidents. Where they overlie a railway line, particular measures are required. Where the parapet is an important element of the character of a bridge, it is usually best to raise the kerb or introduce standard modern parapets at the junction of road and footway, so protecting pedestrians. Where change results in the need to alter parapets, they should be retained and reinstated on the new alignment.

## Alterations and Reuse

- 5.23 When the original use of a structure becomes redundant and a site or associated buildings are redeveloped, the old structure should be retained for possible new use. Any proposal for alteration or reuse of an engineering structure must take into account the character, design and material properties of the original.
- 5.24 Former railway viaducts and bridges make, with little adaptation, ready-made pedestrian and cycle routes. They are best conserved as part of a linear continuation of the routes they once served, not in isolation.
- 5.25 Many chimneys and tall structures have been lost, but some examples remain within residential or other conversions and have now been adopted by their communities, repaired, imaginatively floodlit, and made accessible by the addition of new lifts and stairs clearly distinguishable from the historic artefact.
- 5.26 Structures such as silos, while obviously requiring to be changed, are adaptable if they are no longer used for bulk storage. Windows that might be cut into a reinforced concrete, steel or timber tower should be as contemporary in style as their function requires.

## 6. ARCHAEOLOGY

- 6.1 It is possible that archaeological resources survive within or beneath a structure. Advice on archaeological sensitivity should be obtained from the planning authority's archaeological adviser at an early stage. Planning authorities should seek to manage archaeological issues, such as recording or preservation in situ, through the use of conditions or agreements under Section 75 of the Town & Country Planning (Scotland) Act 1997.

## 7. RECORDING

- 7.1 When proposed works will result in a significant loss of fabric or changes to an engineering structure's character or function, it is recommended that the Royal Commission on the Ancient

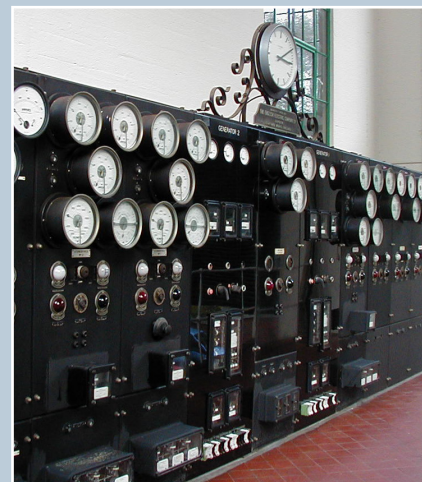
and Historical Monuments of Scotland (RCAHMS) is given the opportunity to record the site prior to works commencing. In addition to recording the structures themselves, RCAHMS' Industrial Survey also undertakes more in-depth recording of fixtures, machinery and industrial processes, which are part of an engineering or industrial site. Please contact the RCAHMS at the following address:

RCAHMS,  
John Sinclair House,  
16 Bernard Terrace,  
EDINBURGH ,  
EH8 9NX.

Tel: 0131 662 1456.

E: [info@rcahms.gov.uk](mailto:info@rcahms.gov.uk).

W: [www.rcahms.gov.uk](http://www.rcahms.gov.uk).



*The control panel at Bonnington Power Station, South Lanarkshire, 1927, was retained in situ by Scottish Power although superseded by a computer.*

## 8. CONSENTS

- 8.1 Scheduled monument consent is always required for works to scheduled monuments. Applications for scheduled monument consent should be made to Historic Scotland.
- 8.2 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 8.3 Where listed building consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and the proposed works in context. It is normally helpful to provide detailed technical information and photographs.



## Other selected Historic Scotland publications and links

[Guide for Practitioners 5: Scottish Iron Structures](#) (2006) (available for purchase)

*Inform Guide: Structural Cracks* (2008)

*Inform Guide: Foundations & Wall Footings* (2008)

*Inform Guide: The Use of Lime & Cement in Traditional Buildings* (2007)

*Inform Guide: Masonry Decay* (2005)

*Inform Guide: Repairing Brickwork* (2007)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.

## Other selected publications and links

Highways Agency, [BD89/03. The Conservation of Highway Structures](#) (Vol. 3, Section 2, Part 4 of the *Design Manual for Roads & Bridges*) (PDF 192K on HA website)

Graham Tilly, *Conservation of Bridges*, Highways Agency/Gifford and Partners (2002)

International Association of Marine Aids to Navigation and Lighthouse Authorities *Lighthouse Preservation Manual* (2004) (website: [IALA](#)).

Roland Paxton & Jim Shipway (eds.), *Civil Engineering Heritage - Lowlands & Borders; Highlands & Islands* (2007)

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

Historic Scotland  
Longmore House  
Salisbury Place  
EDINBURGH  
EH9 1SH

Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

The Institution of Civil Engineers' Panel for Historical Engineering Works, based on its extensive record coverage and specialist knowledge provides advice on the historical engineering merit of engineering works with a view to encouraging excellence in the conservation of significant examples:

Institution of Civil Engineers,  
1 Great George Street,  
Westminster,  
London,  
SW1P 3AA.

Tel: 020 7222 7722.

Email: [engineering@ice.org.uk](mailto:engineering@ice.org.uk).

Web: [www.ice.org.uk](http://www.ice.org.uk).

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[www.historicscotlandimages.gov.uk](http://www.historicscotlandimages.gov.uk)

## Cover images

*Titan Crane (1907), Clydebank, with access lift added, now the focal point of the masterplan for the redeveloped John Brown shipyard.*

*Mass concrete viaduct (1897–1901) at Glenfinnan, Highland.* © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).

*Covesea Lighthouse, Moray.* © N Haynes.





# Extensions



# Key Issues

1. **Most historic buildings can be extended sensitively. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area.**
2. **Extensions:**
  - **must protect the character and appearance of the building;**
  - **should be subordinate in scale and form;**
  - **should be located on a secondary elevation;**
  - **must be designed in a high-quality manner using appropriate materials.**
3. **Planning authorities give advice on the requirement for listed building consent, planning and other permissions.**

## 1. INTRODUCTION

- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to extending historic buildings. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K).



*Esk Net Mills, Musselburgh in 1996 before refurbishment and extension.*



*The extension to Esk Net Mills, Musselburgh, East Lothian. The glass extension of 2006 makes a deferential contrast to the solid masonry of the surrounding courtyard buildings of the 19th-century net-making complex. The design draws on the symmetry and scale of the old buildings, whilst creating a distinctive new component in its form and materials.*

## 2. ADDITIONS TO HISTORIC BUILDINGS

- 2.1 The history of use and ownership of a historic building is reflected in the cumulative changes made to it. They can themselves form an aspect of a building's special interest. New alterations or additions, which are of high design quality sympathetic to the character of the building, form part of this continuum. Most historic buildings can sustain some degree of sensitive alteration or extension to accommodate continuing or new uses.
- 2.2 Yet historic buildings vary in the extent to which they can accommodate change without loss to special interest. Some present the opportunity to promote design intervention that would not have been possible without the historic building as a creative spark. Others are sensitive even to slight alterations. This is especially so of buildings with important interiors - not just great houses, but also, for example, churches with historic pews or factories with surviving machinery. Then an extension rather than internal change may be a way to safeguard the special interest of the building.
- 2.3 Some buildings have interest as little-altered examples of a modest building type. These are harder to extend sympathetically than many more substantial pieces of architecture (see Small Buildings, below).
- 2.4 An extension to a historic building can have a wider impact on the historic environment. For example, archaeology and the



*A complementary addition to a 19th-century country house in the Scottish Borders, in which brick takes its cue from walled gardens.*



*Restoration and replication: Ca D'Oro, Union Street, Glasgow. Designed by John Honeyman in 1872 in the style of a Venetian palazzo, this former furniture warehouse was extended by two replica bays (right-hand side of image) in 1989 and the roof was restored to its original profile.*



*Complementary: Stanley Mills, Perth and Kinross. A new lift tower was added to East Mill that echoes a semicircular stair tower on nearby Mid Mill. The location had been scarred by an earlier lift and rudimentary toilets. A glass strip separates the new-build from the historic masonry.*



*Complementary: Dundas Home Farm, South Queensferry, an 1881 steading converted and extended for residential use from 2001 to 2006. Here a new range takes its cue from the scale and rhythm of the original. © Simpson & Brown Architects.*

layout of lang rigs, important features of the historic fabric of some older towns, should be respected in any new development.

- 2.5 Extensions have the potential to impact on the setting of adjacent historic buildings, which should be taken into account when considering a proposal.

### 3. CONTEXTUAL DESIGN

- 3.1 New work must acknowledge the old in every case, whether that work will be:

- a restoration
- a replication
- a complementary addition
- a deferential contrast
- an assertive contrast

- 3.2 New work should be based on a thorough understanding of the existing historic building. A design statement which describes the interest of the building and an explanation of the impact of the alterations is always useful when assessing proposals for change.

#### Restoration

- 3.3 A building may have lost its original form, and a well-documented reconstruction of a missing element may be proposed. The original frontage to a building may have become partially or completely hidden behind later extensions. The appearance of the building and its setting could be improved by their removal and the restoration of the facade. Planning authorities will often seek to promote restoration, provided there is sound evidence on which to base the work. Where an extension has architectural merit in its own right, or has through time become part of the character and interest of the building, it should be retained.

#### Replication

- 3.4 Replication is where new work is designed specifically to match the original building and does so in all respects, not only in the use of the same materials in the same style. The dimensions and finish of the materials used and details such as coursing, pointing, tooling, window proportion and profile, roof pitch and slate must all be accurately modelled upon the existing building or they will not sit comfortably beside the original.

#### Complementary additions

- 3.5 Complementary new work takes as design cues the profile, massing, bay rhythm, scale and proportion of the existing building, but without replication of the details.
- 3.6 Quite substantial additions can be made to some buildings without detracting from the character of the original work.



The same added to other buildings would result in imbalanced design or a straggling composition. In those cases, a well-designed modern addition that will not read as part of the original building will affect its appearance less radically.

### Deferential contrast

- 3.7 Deferential contrast is where the new becomes a self-effacing backdrop against the old. Even if it is large, it seeks not to be assertive. It might be achieved by reflective glass, for example.

### Assertive contrast

- 3.8 Assertive contrast means affirmation of the new as a more or less equal partner to the old. New and old combined should be of greater lasting value than either on its own. This demands higher-quality new work than would often be found in an isolated new building. The presence of the existing building 'raises the game' for the new build.

## 4. GENERAL PRINCIPLES

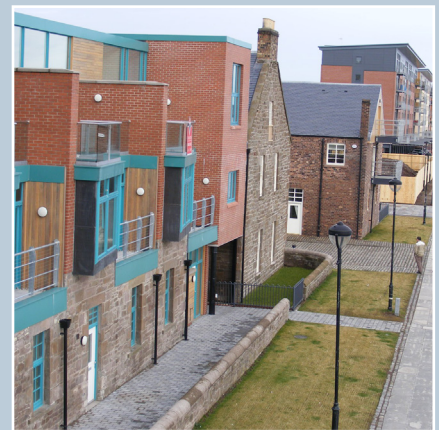
- 4.1 It is difficult to lay down hard and fast rules for new work when much will depend upon the site, the landscape, the scale and form both of the existing building and of the addition or extension proposed. The following basic principles will, however, apply:
- An addition or extension should play a subordinate role. It should not dominate the original building as a result of its scale, materials or location, and should not overlay principal elevations.
  - Where an extension is built beside a principal elevation it should generally be lower than, and set back behind, that facade.
  - An extension that would unbalance a symmetrical elevation and threaten the original design concept should be avoided.
  - An extension should be modestly scaled and skillfully sited.
  - Fire escape routes may be internal wherever space can be created without damaging important interior work. Where an external escape stair is necessary, it should be located as reversibly and inconspicuously as possible, and not on principal elevations.

## 5. SMALL BUILDINGS

- 5.1 Small buildings such as tollhouses and lodges present challenges of scale but may need extension to give them purpose. One way to maintain the visual integrity of the original building may be to construct a lower link block, perhaps in glass, between it and the extension. Very small structures such as garden buildings not intended for permanent occupation will seldom be capable of extension. A proven need for additional accommodation



*Former Arctic Tannery and Harbour Workshops, Dundee. A fire destroyed the upper part that had originally been of timber louvres to cure sealskin hides, replaced in brick. The development of housing (see below) echoes in a new form the timber and brick previously used here.*



*Deferential contrast: Harbour Workshops, Dundee, following redevelopment as housing in 2008.*



*Assertive contrast: the rear extension of the former India of Inchinnan Tyre Factory (1930). The aerodynamic curve reflects earlier use of the site to make aircraft and dirigibles.*



An extension to a house in a conservation area, set back from the front elevation, of glass and timber that echoes conservatories in the area.



Fairfield House, Dalkeith, built for an iron founder. The cast-iron vine house on the right was repaired as part of the development as offices for Midlothian Council. The house is still the focal point although smaller than the new-build addition. The pink building is the rear of a separate structure.

© Royal Fine Art Commission.



Former nurses' home of 1938–47, Salisbury Road, Edinburgh. The additional rooftop storey is set back from the wallheads, minimising its impact on the original design.

might instead be met by a new free-standing suitably scaled and designed structure, nearby or elsewhere. A condition might be set to phase the new work after the repair or restoration of the small building.

## 6. ROOF EXTENSIONS

- 6.1 A planning authority will consider the special interest of the existing roof and the visibility of the extension in views, and take into consideration the amenity of adjacent buildings. See also Historic Scotland's *Managing Change in the Historic Environment: Roofs*.

### Special interest

- 6.2 Where the external form is significant to the character of the building, or where the internal structure and decoration have historic interest, a roof extension will not be appropriate that destroys this or requires such a high degree of new supporting structure that only the facades of the historic building remain.

### Visibility

- 6.3 A roof extension may not comfortably fit where long views are important to the profile of a building. Where streets are narrow and buildings are tall, the visual impact to pedestrians in the street of a roof extension will be less but must not have an adverse impact.

### Height

- 6.4 The presence of a neighbouring high building should not be taken as a reason for an inappropriate roof extension to a historic building.

## 7. BUILDING STANDARDS

- 7.1 Rather than force the existing building to adapt to meet modern requirements, the new extension will normally be the place to provide:

- accessibility to existing floor levels through lifts and ramps (see accessibility guidance in this series)
- new services that might be difficult to route through the existing building
- high thermal performance
- fire separation
- rainwater collection and disposal (consider Sustainable Drainage Systems)
- independent foundations that do not compromise the foundations of the existing building

- 7.2 Many historic buildings are capable of alteration that is of its time, respects and defers to what has gone before, and may be



justified as supporting the continued conservation and use of that building. A Design and Access Statement, if required, should bring this out within these guidelines and with reference to a statement of significance or conservation plan specific to the building.

## 8. ARCHAEOLOGY

- 8.1 It is possible that archaeological resources survive within or beneath a listed building or unlisted building in a conservation area. Planning authorities should seek to manage archaeological issues, such as recording or preservation in situ, through the use of conditions or agreements under Section 75 of the Town & Country Planning (Scotland) Act 1997. Advice on archaeological sensitivity should be obtained from the planning authority's archaeological adviser at an early stage.

## 9. RECORDING

- 9.1 When proposed extension works to a listed building will result in significant loss of fabric or changes to the building's character, it is suggested that the Royal Commission on the Ancient and Historical Monuments of Scotland's (RCAHMS) is given the opportunity to record the historic structure prior to works commencing. This becomes a statutory requirement only when demolition of the historic structure is proposed. However, RCAHMS is always pleased to consider recording changes to historic structures whenever the opportunity arises. Contact details for RCAHMS can be found overleaf.

## 10. CONSENTS

- 10.1 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 10.2 Where listed building consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and the proposed works in context. It is normally helpful to provide detailed technical information and photographs. A brief description of the interest of the building and an explanation of the impact of the alterations are always helpful in assessing change.



*Kilncraigs Business Centre, Alloa. Above: cast-iron columns are retained internally behind the glazed curtain wall constructed in 2000. Below: A 19th-century woollen yarn store was skilfully extended in contrasting concrete and steel (left-hand side of photo) in 1938 by William Kerr. Most of the very deep original but multi-phase block (right-hand side of photo) was cut back and a new curtain wall added to the existing structure in 2000, making an assertive but revealing contrast of new and old, and achieving a visual link between Alloa Tower and the town. Junctions are clearly formed in red and white.*



## Other selected Historic Scotland publications and links

[Guide for Practitioners 6: Conversion of Traditional Buildings](#) (2007) (Historic Scotland online shop: DVD available for purchase).

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.

## Other selected publications

Scottish Government, [A Policy on Architecture for Scotland](#) (2001) (PDF 608K) and [Building Our Legacy: Statement on Scotland's Architecture Policy](#) (2007) on Scottish Government website.

## Other selected contacts

Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS)  
John Sinclair House  
16 Bernard Terrace  
EDINBURGH  
EH8 9NX

Tel: 0131 662 1456  
Fax: 0131 662 1477  
E: [info@rcahms.gov.uk](mailto:info@rcahms.gov.uk)  
W: [www.rcahms.gov.uk](http://www.rcahms.gov.uk)

Architecture & Design Scotland (A+DS)  
Bakehouse Close  
146 Canongate  
EDINBURGH  
EH8 8DD

Tel: 0131 556 6699  
Fax: 0131 556 6633  
web: [www.ads.org.uk](http://www.ads.org.uk)  
e-mail: [info@ads.org.uk](mailto:info@ads.org.uk)

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

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Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

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## Cover images

*Beach Shelter (1934), Broughty Ferry Esplanade, City of Dundee, extended and refurbished in 2005.*

*Castlemilk Stables (circa 1800), Glasgow, were converted in 2003–7 for the Glasgow Building Preservation Trust, requiring a glazed extension into the courtyard to give reception and circulation space to the narrow stable buildings around the perimeter of a square.*

*Pier Arts Centre, Stromness, Orkney, refurbished and extended in 2007. The scale and massing of the extension complements the adjacent traditional waterfront buildings that provide the conservation area with much of its character.*





# External Fixtures



# Key Issues

- 1. Historic external fixtures form an important element in defining the character of a historic building or group of historic buildings. New external fixtures can have an impact on the character of historic buildings or areas. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area.**
- 2. The protection provided by statutory listing extends to all categories of listing, and to all parts of a building, including its external fixtures.**
- 3. Before undertaking repairs or alterations it is important to identify the interest of the fixture and seek to maintain its characteristics in the new work. This includes understanding the materials, method of construction, colour, texture and detailing.**
- 4. New external fixtures should be sited to maintain the special architectural or historic interest, integrity and fabric of the building.**
- 5. The means of new fixing should always be non-ferrous to prevent structural damage or staining.**
- 6. Planning authorities give advice on the requirement for listed building consent, planning and other permissions.**

## 1. INTRODUCTION

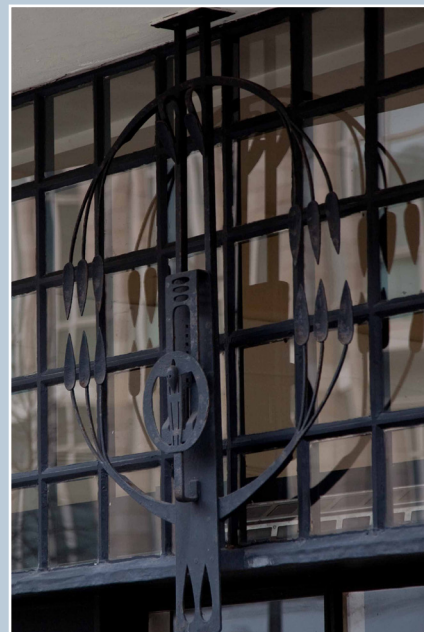
- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to altering the external fixtures of historic buildings. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K).
- 1.4 Separate guidance in this series is available on new micro-renewable technology fixtures.

## 2. WHY ARE EXTERNAL FIXTURES IMPORTANT?

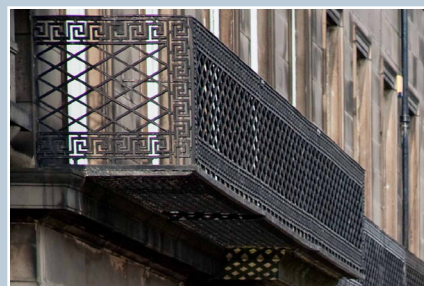
- 2.1 Historic external fixtures contribute to the architectural and/or historic character of a building and townscape. Decorative ironwork, balconies, lamps, clocks, street signs, rainwater goods, machinery, and other fixtures can be integral to the architecture and reveal information about the age and use of a building and may be examples of technological advances. Beyond their functional value they are often decorative and contribute to the visual attractiveness of a historic building. External fixtures can reveal a hierarchy of spaces within a building, perhaps indicating the location of the main entrance or principal floor or room.
- 2.2 New fixtures can have a substantial impact on the appearance of a historic building, and the means of attachment can cause damage to historic fabric. The location, size and number of fixtures and the method of fixing require careful consideration to protect the character of a historic building.

## 3. IDENTIFYING THE INTEREST OF HISTORIC EXTERNAL FIXTURES

- 3.1 From early times various sorts of fixtures have been applied to buildings, from simple tethering hoops to lamps. From the



*Decorative ironwork by Charles Rennie Mackintosh fixed to the exterior of the Willow Tea Rooms in Sauchiehall Street, Glasgow.*  
© N. Haynes.



*A cast-iron balcony marking the principal room on the first floor of a townhouse in Regent Terrace, Edinburgh, part of the development planned by William Henry Playfair in 1825 and built 1826–33.* © N. Haynes.



*The weather vane at New Lanark mill village was restored in 1980, made by a local craftsman with the names of the villagers stamped on the shaft.*  
© New Lanark Trust.





*An elaborate cast-iron bootscraper at the entrance to a house in Randolph Crescent (1829), Edinburgh. Such fixtures were common in the early 19th century when road surfaces were generally muddy. © N. Haynes.*



*A cheese press built into the wall of a farm cottage at Reay, Highland. Although the press is no longer used, it provides insight into the type of farming of the area and past methods of cheese production.*



*A later 19th-century cast-iron 'barleysugar' downpipe and decorative bracket in Rothesay, Isle of Bute. © N. Haynes.*

18th century the range and complexity of fixtures expanded enormously. Some fixtures were planned from the outset of a building, whilst others were added at a later stage. Fixtures can demonstrate a combination of architectural, associated and historical interest:

- 3.2 **Architectural interest:** in for example the design or style of fixtures, or the way in which they relate to the architectural form of the building.
- 3.3 **Associated interest:** a fixture, such as a clock, might be connected with a significant designer, craftsman, patron, or occasionally with historical events.
- 3.4 **Historical interest:** this derives from the potential of a fixture to provide evidence about the past, illustrating social change, revealing how an object was made, advances in technology, or how a building worked. For example the widespread provision of bootscrapers at the entrances to 18th- and 19th-century houses gives an insight into life before the advent of asphalt roads and cars.

## 4. GENERAL PRINCIPLES FOR ALTERATIONS AND REPAIRS TO HISTORIC EXTERNAL FIXTURES

- 4.1 Alterations or repairs to historic external fixtures must protect their character and special interest. Fixtures can be valuable in their own right as major elements in the design of a historic building, broader streetscape or landscape setting. Documentary research and fabric analysis will be useful in understanding the design and material properties of historic external fixtures before undertaking alterations or repairs.
- 4.2 The potential impact of repetition of alterations to fixtures in unified designs of streets and other groups of buildings should be considered.

### Maintenance

- 4.3 Cast-iron fixtures require regular re-painting to prevent corrosion. Other types of metal may need different maintenance regimes. Where corrosion is severe and the structural integrity of the feature compromised, in rainwater goods for example, a careful record should be made and its replacement made to match in material and design. In some instances there may be a variety of styles employed and proposals to unify non-matching details should be carefully considered as they may relate to a significant historical alteration.

### Removal

- 4.4 Certain historic fixtures may be functionally obsolete but continue to contribute to the architectural interest of a listed building and be of historical value. They should always



be retained. Should a historic fixture require removal and reattachment, non-ferrous fittings should be used and existing fixing points used where possible. Where ferrous fittings are required, an epoxy barrier must be used.

## 5. PRINCIPLES FOR THE ADDITION OF NEW EXTERNAL FIXTURES

### General

- 5.1 A great number of possible new external fixtures associated with contemporary living can be proposed that may have an impact upon historic buildings, from alarm boxes to security cameras. A number of these may be small in size but their cumulative effect in a historic place can be detrimental. Consideration should be given to the lifespan of a new fixture and whether or not change of ownership could result in replacement or removal.
- 5.2 The potential for incremental damage by numerous fixtures of a similar nature can be avoided by the shared use of equipment on buildings in multiple occupation or on buildings grouped closely together.

### Siting of new fixtures

- 5.3 New external fixtures must be sited to minimise impact on the architectural integrity and fabric of the building. Secondary elevations, outbuildings and roof valleys or flats that are out of sight from principal views can often accommodate new fixtures without significant impact. Close attention to the routing of any associated cabling or pipework away from principal elevations and features will help to minimise the visual effect of new equipment.
- 5.4 If a new fixture is necessary and no alternative to a prominent elevation is appropriate then it should be discreetly located without damaging any architectural feature. Painting the fixture to match the colour of stonework can sometimes minimise its impact. The fitting and means of fixing should always be non-ferrous to prevent damage and staining. Fixing into joints is normally the best option.

### Telecoms and satellite technology

- 5.5 Telecommunication devices and satellite dishes can have an adverse impact upon the appearance of a building. These should be positioned so as not to alter a historic profile or skyline, or where impact is minimal.
- 5.6 Antennae associated with mobile phone technology can be situated within some prominent buildings where installation does not require the removal of original fabric or where timber components can be removed and stored for later restoration. A creative approach can result in successful camouflage in some



*The cumulative effect of modern fixtures, including satellite dishes, air conditioning units, signage and street lighting, is damaging to the character of this 18th-century building.*



*These satellite dishes are positioned in a roof valley and are not visible from street level. Fixed to later service features, they do not damage architectural details. © N. Haynes.*



*The landmark tower of St Stephen's Church (1828), Edinburgh. Telecommunications antennae are positioned on either side of the clock face and on the parapet above behind GRP (glass-reinforced plastic) material that replicates the colour of the surrounding stonework. All the works are easily reversible if the technology changes or becomes redundant. © N. Haynes.*



*A small, discreet, brass plaque commemorates the reconstruction of Mitchell's Close in Haddington, East Lothian.*



*Discreet sprung wires are attached to the top surface of this cornice to deter birds. Miller Street, Glasgow.*



*Gallery of Modern Art, Glasgow. The floodlights are positioned behind a cornice and on the roof, therefore making little impact in daylight but providing atmospheric lighting after dark. © N. Haynes.*

locations. Planning authorities are able to condition the removal of equipment when it becomes redundant.

## Signage

- 5.7 New signage should be incorporated into the overall architectural composition of a building. It should not obscure or damage any architectural detail. Traditional signage materials and palettes of colour can complement the appearance of the building. Paint should not be applied directly to previously unpainted stonework. Separate guidance on shopfronts and shop signage is available in this series.

## Flagpoles

- 5.8 Flagpoles should relate to the building's character, scale, proportions and architectural detailing.

## Banners

- 5.9 Banners may sometimes be fixed to historic buildings if the means of attachment does not damage any architectural details. However, they should only be allowed on a temporary basis, and not where they would have an adverse impact upon the character or appearance of the building.

## Bird control

- 5.10 Bird control devices require careful consideration to minimise the impact upon historic character. Wire mesh and spikes can be visually detrimental whereas sprung wires are generally less obtrusive. A balance should be sought between conserving the visual characteristics and protecting the building and its users from bird nuisance: less intrusive bird control devices should be considered first.

## Lighting

- 5.11 Street and floodlighting must be considered carefully to minimise detrimental impact on the character of the building.
- 5.12 Street lighting fixed to a principal elevation should only be considered where independent lighting poles are not appropriate. The lamp and the associated cabling should be carefully integrated within the architectural composition.
- 5.13 The innovative and imaginative use of lighting can be an important component in enhancing the distinctiveness and character of a building or conservation area. Fixtures should always be located unobtrusively, on a basement wall for example.
- 5.14 New lamps to light an entrance should be sympathetic to the design and materials of the building.

## Alarm boxes and utility meters

- 5.15 Alarm boxes and utility meters should be fixed in discreet positions without damaging architectural composition or details.

Lesser elevations, basement walls or beneath a platt may be appropriate solutions.

### Security cameras

- 5.16 Security cameras require prominent positions to achieve maximum surveillance but should not be permitted in positions that damage the architectural character or appearance of a historic building. Careful consideration should be given to the size of the camera. Positioning of security cameras and cabling should be discrete.

### Eye bolts and brackets

- 5.17 Eye bolts for window cleaning access or the attachment of seasonal street decorations should only be permitted where they will be situated discreetly and without damaging architectural details. The material and means of fixing should be non-ferrous, preferably coloured to match adjacent stonework.
- 5.18 Temporary scaffolding should not be anchored into stonework as the fixings will leave permanent damage. Scaffolding should be fixed around architectural features, ensuring no damage occurs during construction or dismantling. Protective materials fixed between steel scaffolding ends and stonework will help prevent accidental damage.
- 5.19 The location and number of hanging baskets and their associated fixings should be carefully considered, and where possible incorporated within the composition of an elevation. The baskets and fixings should not damage or obscure any architectural detailing.

## 6. CONSENTS

- 6.1 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 6.2 Where listed building consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and the proposed works in context. It is normally helpful to provide detailed technical information and photographs. A brief description of the interest of the external fixture and an explanation of the impact of the alterations are always useful in assessing change.



*Here the corner profile of the building is broken by the brackets for a security camera, an old lamp, and modern street lamp. High Street, Edinburgh.*



*Discreet stainless steel eye-bolts are re-used each year for the Christmas decorations in Bo'ness. © N. Haynes.*



## Other selected Historic Scotland publications and links

[Maintaining your Home – A Short Guide for Homeowners](#) (2007) (PDF 1.4MB)

*Inform Guide: Finials & Terminals* (2008)

*Inform Guide: The Maintenance of Cast-iron Rainwater Goods* (2007)

*Inform Guide: Maintenance of Iron Gates and Railings* (2007)

*Inform Guide: Boundary Ironwork – A Guide to Reinstatement* (2005)

*Inform Guide: Bird Control on Buildings* (2008)

*Inform Guide: Bronze – The Care & Maintenance of Monumental Bronze* (2005)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

Historic Scotland  
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Salisbury Place  
EDINBURGH  
EH9 1SH

Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

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[www.historicscotlandimages.gov.uk](http://www.historicscotlandimages.gov.uk)

### Cover images (all © N. Haynes)

*Bronze torchère lamp (1929), Younger Hall, St Andrews, Fife.*

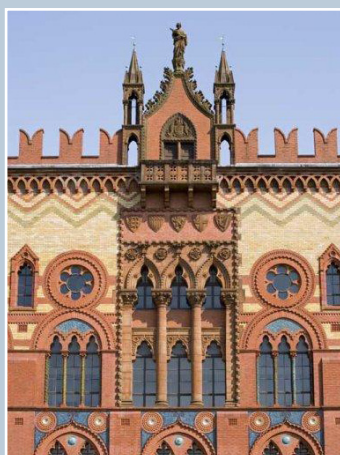
*Later 19th-century cast-iron window grille, Vicar Street, Falkirk.*

*Eighteenth-century sundial, Linton Kirk, Scottish Borders.*





# External Walls



October 2010

# Key Issues

- 1. The external walls of a historic building are an important element in defining its character. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area.**
- 2. The design, materials, method of construction, colour, texture, detailing and finish typically contribute to the character of a historic wall.**
- 3. Maintenance and appropriate repair are the best means of safeguarding the historic character of a wall. This also reduces the requirement for new raw materials and energy.**
- 4. Physical or documentary evidence must inform the reinstatement or reconstruction of walls. New work to a historic wall must seek to maintain its character.**
- 5. If evidence of blocked openings or earlier phases of work is revealed, this should be documented, and where possible retained.**
- 6. Traditional walls contribute to energy efficiency through their thermal mass, which allows for natural warming and cooling.**
- 7. Planning authorities give advice on the requirement for listed building consent, planning and other permissions.**

## 1. INTRODUCTION

- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to altering the external walls of historic buildings. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K). Local authorities' archaeological advisers are a source of advice about potential archaeological sensitivity.



*Neolithic house, Skara Brae, Orkney. From the earliest times walls were designed to provide shelter and security, to contain warmth, and to meet the functional requirements of domestic and ritual life. Local materials and skill traditions established different patterns of wall construction and building design in different parts of the country, and adapted to new types of building and usage over time.*

## 2. WHY ARE HISTORIC EXTERNAL WALLS IMPORTANT?

- 2.1 External walls are usually the defining feature of a historic building or monument. They not only incorporate the bulk of the historic fabric and perform structural or weather-protection tasks, but through their design they can also express some of the cultural and intellectual context in which the building was created.

### Design qualities

- 2.2 Many of the formal qualities of a historic building, such as scale, proportion, colour, texture or style, are largely derived from the design and construction of its walls. The dimensions, types of materials and finishes, and the position and size of openings within the wall may all be important indicators of the building's age, purpose, status, or development through time.

### Material qualities

- 2.3 Often design considerations were determined by the technological capabilities of the period, local building materials and traditions, topography and climate, stylistic intent, and social or economic circumstances.

### Structural qualities

- 2.4 External walls generally have a structural function in supporting floors and roofs as well as providing a protective envelope



*Central block of the former Fife Arms Hotel, Banff, 1843–5. The classical design places emphasis on the symmetry, proportions and detailing of the walls and reflects the functional hierarchy of the interior. Corniced windows indicate the principal rooms on the first floor; smaller windows relate to private or subsidiary rooms. The design maximises the architectural impact of the walls by hiding the shallow pitched roof behind a parapet.*  
© N.Haynes.





*The mid-18th-century Old Schoolhouse at Cottown, Perth & Kinross. The uneven character of the wall surface is derived from the local materials used in its straw-bonded mudwalls. The colour reflects the use of local clay as a pigment in the modern coating of lime harl and limewash applied during repairs by the National Trust for Scotland. The different window sizes reflect the internal hierarchy of rooms.*  
© N. Haynes.



*High Street, Arbroath. Rich pink-red sandstone, typical of parts of Angus. Here the stone is laid in regular courses.* © N. Haynes.



*Harling being carried out at Dymock's, Bo'ness.* © N. Haynes.

around the internal spaces. Other external walls act primarily as a weatherproof skin, with structural support provided by a framework of timber, iron, steel, or reinforced concrete (depending on the age of the building). Whether structural or non-loadbearing, external walls are critical to the long-term stability and technical performance of the building.

### 3. IDENTIFYING THE INTEREST OF HISTORIC WALLS

- 3.1 The walls of historic buildings have a wide variety of forms and materials, ranging from relatively simple local vernacular to highly crafted opulence, reflecting their ownership, location, purpose, and the period(s) of their construction.

#### Earth and clay

- 3.2 From early times, walls were constructed from local natural materials such as clay, timber and stone. While stone rubble walls remain the most obvious legacy from the past, buildings were constructed into the 19th century from walls of clay mixed with straw or from clay and boole (uncut stone), often with a sacrificial layer of lime or clay render to provide further protection. Double-skinned stone rubble walls with earth packed between were a common form of construction until the 19th century.

#### Stone

- 3.3 Stone is the predominant building material in Scotland's historic buildings and often reflects the local geology: e.g. red sandstone in the South-West, paler sandstone in the East, granite in Aberdeenshire. Advances in technology in the 19th century freed stone from being the main structural element of building, although it continued to be used in wall construction and cladding to protect the structural frame. The size of the stones, their position and the style of jointing contribute significantly to the character of a wall and can demonstrate distinctive local traditions. The finish of stone ranges from roughly shaped or simply squared rubble to tooled and finely polished ashlar. Jointing can vary from broad 'slaister' pointing in lime mortar to wafer-thin joints filled with lime putty. Decorative carved stone details were employed on walls from the medieval period into the 20th century.

#### Harling

- 3.4 Harl or render was extensively used as a surface coating to protect friable construction materials or to provide the illusion of a fine masonry finish. Traditionally lime harling was used. This was mixed with local aggregates, from which it gained its pigmentation.

#### Brick

- 3.5 Brick began to be manufactured in Scotland in the 17th century but did not gain significant production and use until the 18th century. Garden walls, farm offices and farmhouses saw the



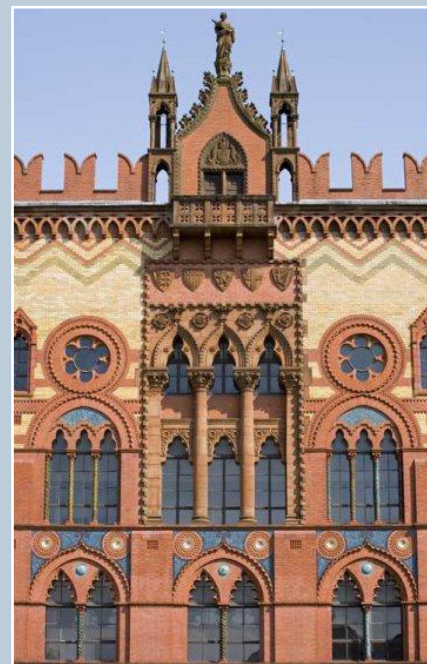
early adoption of brick. In the 19th century, improvements in production quality and volume led to a widespread use of brick for industrial purposes and housing, particularly in mining areas. Brick was also widely used for housing between the wars, and was put to good use by 20th century modernist architects.

### Concrete

- 3.6 From the 1850s, mass concrete was used for building sheds and houses, often using similar construction techniques to clay walling. Reinforced concrete was used extensively in the 20th century, initially for its structural properties but in the post-war period for the aesthetic value of its finishes. The aggregate employed could result in a very coarse surface, and the imprint of rough wooden shuttering resulted in a highly textured surface.

### Other materials

- 3.7 From the mid 19th-century, many firms produced catalogues of prefabricated buildings ranging from cottages, barns, meeting halls and churches to whole factories made of timber frames clad with corrugated iron. The profile, pitch and gauge of the metal and the choice of finish establish the distinctive character of these walls. Technological advances have resulted in cladding in a variety of metals in the 20th century as well as materials such as ceramic tiles, terracotta, faience, vitrolite and glass.



*Former Templeton's Carpet Factory, City of Glasgow (1889). The decorative brick alludes to the pattern of an Axminster carpet and to the form of the Doge's Palace, Venice. © Crown copyright: RCAHMS. Licensors [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*

## 4. GENERAL PRINCIPLES FOR ALTERATIONS AND REPAIRS

- 4.1 The following should be read in conjunction with Historic Scotland's Technical Advice notes. Details are given at the end of this guidance note.

### Character and interest of the building

- 4.2 Every effort should be made to repair the external walls of a historic building and alterations or repairs should protect its character. Walls are valuable in their own right as major elements in the design of a historic building and for their practical performance and appearance. Documentary research and fabric analysis is useful in understanding the design and material properties of historic walls before undertaking alterations or repairs.

### Maintenance

- 4.3 Regular inspection, maintenance and appropriate repair are essential to maintaining the structural and visual integrity of historic walls.

### Alterations

- 4.4 All alteration proposals should take into account the design and material characteristics of the historic wall. Most buildings have one or more principal elevation, which is usually particularly



*Mass concrete tenements in Dundee, cast insitu in 1874–5 by the Concrete Building Company for the Working Men's House Building Association. The buildings were renovated and a buff render applied in 1982–4. © Crown copyright: RCAHMS. Licensors [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*



*Structural instability requires the rebuilding of this wall in Peterhead. The granite stones have been numbered ready for reinstatement.*



*Dymock's Buildings (late 17th century), Bo'ness, were restored by the National Trust for Scotland in 2004. A cement render was removed, the archaeology of the wall recorded, and then a lime harl and limewash were applied. Evidence of former openings remains visible.*  
© N. Haynes.

sensitive to alteration. There are often ways of accommodating alterations, perhaps in alternative locations, without detriment to the character of a principal elevation. The design, materials and construction of alterations should seek to complement the original.

### New openings

- 4.5 The formation of a new opening in a wall needs to be considered in light of the overall composition of the wall and assessed as to whether or not it would be consistent with the existing design. Care should be taken to ensure that the cumulative effect of new openings does not harm the special interest of the building. Where the formation of a new opening is found to be consistent with the design of the wall, the minimum historic fabric should be removed and the opening should be detailed to match the existing openings. Where there is no obvious precedent, a clearly modern intervention of high-quality design may be appropriate. Service ducts and vents should be located on secondary elevations. Separate guidance on extending buildings is provided in this series.

### Rebuilding

- 4.6 There may be occasions when a wall needs to be rebuilt for structural reasons. In most cases it is possible to rebuild the wall reusing the bulk of the dismantled original material. Dressed stone in particular should be rebuilt in its original position. It is important to maintain the proportions, depth and irregularities arising from historic methods of construction in the rebuilt wall. New materials should normally match the characteristics of the existing in all respects. The opportunity should be taken to restore any details of the wall that have previously been altered. Proposals to rebuild should normally be accompanied by a structural report and detailed survey drawings to enable a faithful reconstruction.

### Reinstatement

- 4.7 Where walls have been altered inappropriately in the past, reinstatement should be based on documentary or physical evidence of missing features or materials.

### Harling

- 4.8 New lime or clay harl, render or limewash should be based on evidence of previous use of the material on the building. Properly specified traditional materials allow the wall to absorb and evaporate moisture effectively. Historic cement renders should only be removed if found to be causing damage. The application of limewash should likewise be backed by evidence.

### Repointing

- 4.9 Repointing should use traditional materials compatible with the wall's original construction and detailed in a manner appropriate to the character of the building. Inappropriate materials can be damaging to the surrounding stone. It is advisable to seek



professional guidance in specifying and using traditional materials.

### Paint

- 4.10 The application of paint to unpainted historic walls can cause considerable damage in the long term by preventing the evaporation of moisture from the underlying fabric. Where paint has been applied in the past and is harming the performance of a wall, careful removal is recommended, guided by expert advice.

### Indenting and plastic repairs to masonry

- 4.11 Stones only need to be replaced when they have decayed to such a degree that they affect the structural stability of the surrounding stonework. Indent repairs should be carried out in stone that best matches the existing stonework in mineralogical composition and carried out to the highest technical standards. Eroded stonework does not necessarily require repair. Cladding or plastic repairs in synthetic materials are likely to exacerbate decay as well as being visually detrimental. Planning authorities may ask for evidence to show that repairs are necessary and that the repair methods are appropriate.

### Sculpture

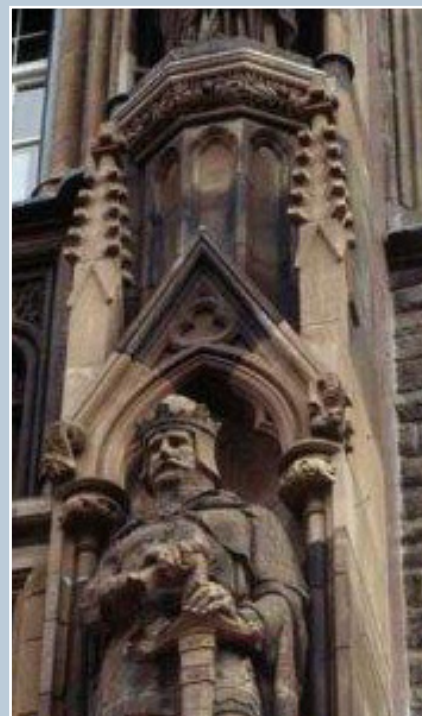
- 4.12 Replacing sculptural stonework on a wall must be considered against its significance and that of the building as a whole. Erosion is a naturally occurring phenomenon and can be part of the attractive aging process of a historic building. If decorative stonework is a significant architectural feature then the replacement of sculptural details to maintain its significance may be appropriate.

### Cleaning

- 4.13 The patina that materials acquire through age and weathering can be an important part of the character and appearance of a wall. The weathering of building materials often enhances their attractive qualities. Weathering layers can form natural barriers that protect the material from erosion, and attempts to remove them can cause considerable damage and accelerate decay. Cleaning should normally only be considered where the structural integrity of the wall is threatened by surface growths. To ensure that the cleaning method will not damage the stone or brickwork, applications for listed building consent should be supported by a technical analysis and sample test cleaning of small unobtrusive areas.

### Archaeology

- 4.14 Work to historic walls can often reveal features such as blocked openings or a change in material that can provide significant information about the development history and fabric of the building. Photographic or measured recording may be appropriate if the evidence will be covered over in the course of the works. Where there is a high likelihood of uncovering



*Scottish National Portrait Gallery, City of Edinburgh, 1890. Decisions about whether to re-carve stonework are a matter of values. Here the artistic value of a sculpture calls for it to be conserved mostly as found, whereas the architectural elements (finials and hoodmoulds) that also function in shedding rainwater have been completely replaced where required. © Copyright: RCAHMS (William McKelvie Collection). Licensors [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*



*Graffiti: The removal of graffiti requires prompt action before the paint or ink dries into the wall surface. Cleaning methods should be tested on a small unobtrusive area to determine the least aggressive treatment for effective removal of the graffiti. In extreme cases of repeated vandalism, a sacrificial wax coating might be considered for vulnerable surfaces.*



*The exposed wall of this 17th-century house in Cupar, Fife, reveals archaeological evidence of a number of blocked openings. The previous mixture of window sizes and levels has been regularised in the current arrangement. © N. Haynes.*



*Modern lime mortar pointing, Scottish Lime Centre, Charlestown, Fife. The use of lime allows the wall to 'breathe'. Traditionally, most rubble walls had lime slaistered, or buttered, over the joint to achieve a fairly smooth finish that would erode with time. Where pointing does not alter the character of a listed building it would not normally require consent.*

archaeological evidence in a major building, adequate provision should be made for recording as works progress.

## 5. ENERGY EFFICIENCY

- 5.1 Energy conservation is necessary in addressing climate change. In many cases cost-effective and sustainable improvements to the energy efficiency of traditional buildings can be achieved without damage to their character. Heat loss typically occurs in various parts of a building. It is important to take an overall view of energy efficiency measures.
- 5.2 Proper maintainance of traditional masonry walls will help to maximise their thermal efficiency. This is usually achieved through mass and their performance is dependent on their ability to retain heat and 'breathe' out moisture. Preventing the build-up of excess water in external walls will help to optimise their weatherproofing and thermal performance. Measures to consider include:
  - prompt repair of roofs, gutters, downpipes, wallheads, and missing pointing or harling;
  - appropriate above and below ground drainage;
  - appropriate repairs in traditional materials to maintain the breathable qualities of joints, stonework and internal painted surfaces.
  - investigation of appropriate insulation.
- 5.3 Additional energy conservation measures are best considered in the context of all component parts of a building. Further information is available in Historic Scotland's *Inform Guide: Energy Efficiency in Traditional Homes*.

## 6. CONSENTS

- 6.1 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 6.2 Where listed building consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and the proposed works in context. It is normally helpful to provide detailed technical information and photographs.



## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

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[www.historicscotlandimages.gov.uk](http://www.historicscotlandimages.gov.uk)

### Cover images

*Charles Rennie Mackintosh's Daily Record Building (1900–04), Renfrew Lane, Glasgow. The tall frontage to the narrow lane is faced in white glazed brick at the lower levels to reflect and maximise light. © N. Haynes.*

*Decorative brickwork at the former Templeton's Carpet Factory (by William Leiper, 1888), Glasgow. The colours are paler after acid cleaning in the 1980s. © Crown copyright: RCAHMS. Licensor [www.rcahms.gov.uk](http://www.rcahms.gov.uk).*

*George Square, Edinburgh. The replacement stone (at the bottom of the photograph) is carefully matched with the original 1890s stone for type, colour and tooling. Natural weathering will reduce the contrast between the new and old work. © N. Haynes.*

### Other selected Historic Scotland publications and links

[Maintaining your Home – A Short Guide for Homeowners](#) (2007) (PDF 1.4MB)

*Inform Guide: Energy Efficiency in Traditional Homes* (2008)

*Inform Guide: Damp Causes & Solutions* (2007)

*Inform Guide: Masonry Decay* (2005)

*Inform Guide: Repointing Ashlar Masonry* (2008)

*Inform Guide: Indent Repairs to Sandstone Masonry* (2007)

*Inform Guide: Structural Cracks* (2008)

*Inform Guide: The Use of Lime & Cement in Traditional Buildings* (2007)

*Inform Guide: Repairing Brickwork* (2007)

*Inform Guide: Care & Maintenance of Corrugated Iron* (2008)

*Inform Guide: Cleaning Sandstone: Risks and Consequences* (2007)

*Inform Guide: Graffiti and its Safe Removal* (2005)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.



HISTORIC SCOTLAND  
ALBA AOSMHOR

# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

## Fire Safety Management





Cover image: An example of emergency escape signage above the door in the opulent main hall of Renfrew Town Hall. The Hall opened in 1873, but had to be rebuilt after a fire ravaged the building only four years later. It is now A-listed and has recently undergone a substantial refurbishment programme which was part-funded by Historic Scotland. © Renfrew Town Hall

Above: Charles Rennie Mackintosh's masterpiece, the A-listed Glasgow School of Art, suffered a major fire on 23 May 2014 which destroyed its internationally renowned library interior. A Restoration Committee has been set up by the School of Art to oversee the building's restoration. © Crown Copyright Historic Scotland

Managing Change<sup>1</sup> is a series of non-statutory guidance notes about managing change in the historic environment. They explain how to apply Government policies.

The aim of the series is to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.

<sup>1</sup> <http://www.historic-scotland.gov.uk/index/heritage/policy/managingchange.htm>



# INTRODUCTION

This note sets out the principles that apply to fire safety management in historic buildings. Historic Scotland's *Guide for Practitioners 7: Fire Safety Management in Traditional Buildings*<sup>2</sup> (2010) is the primary source of guidance when applying the relevant fire legislation to historic buildings. When considering building warrant issues under the Building (Scotland) Act 2003, our *Guide for Practitioners 6: Conversion of Traditional Buildings*<sup>3</sup> will also be helpful.

Two overarching issues govern fire safety management in the historic environment:

- the identification and assessment of fire hazards and the associated risk of these causing harm to occupants, and the use of that information to identify where and what intervention is needed
- using an understanding of the building's character to consider how necessary measures can be implemented while causing least harm to the building's integrity – the very factors that lend it historic interest

# KEY ISSUES

1. The paramount objective in fire safety is the protection of human life.
2. Historic buildings pre-date modern attitudes towards fire safety, meaning they can be vulnerable to fire. So, in order to safeguard people and historic fabric, physical intervention into a building's fabric may be required.
3. A key approach to fire safety management is risk assessment, a process of identifying risks and acting to mitigate or reduce these to manageable levels. This is a structured and holistic approach that identifies what interventions are required. In most cases these will involve a combination of management systems and physical protection measures.
4. In historic buildings, the aim is to achieve a balance between fire safety provision and the protection of a building's historic character. Where physical intervention is necessary, careful consideration should go into design and installation in order to respect and minimise impact on the building's character.
5. Listed building consent, which is administered through local authorities, is required for any works affecting the character of a listed building. Planning permission may also be required. Scheduled monument consent, which is determined by Historic Scotland, is always required for works to scheduled monuments. See Section 9 for more information.

2 <http://conservation.historic-scotland.gov.uk/publication-detail.htm?pubid=7370>

3 <http://www.historic-scotland.gov.uk/guide-for-practitioners-6.pdf>



↑ Linlithgow Burgh Halls, which dates from the seventeenth century, reopened in 2011 after a substantial redevelopment. The project included a requirement to provide a new fire escape for the A-listed building. The solution here was to provide an enclosed escape stair clad in zinc. © Dave Morris Photography



↑ Category A-listed Morgan Academy is an example where the owner of the building, Dundee City Council, took the unusual decision to restore the building rather than explore options around demolition, following a significant fire in 2001 which destroyed the interior and left an unstable external shell. You can find out more about the project in the case study produced by Architecture and Design Scotland. © Crown Copyright; RCAHMS

↓ The restored building. © Crown Copyright; RCAHMS



# 1. UNDERSTANDING THE CHARACTER OF A HISTORIC BUILDING

It is important to establish at the outset what a specific building's significance is, as well as the relative significance of its component parts. The character and significance of a historic building can derive from a number of factors, from how it is planned and designed to its materials and cultural associations. These factors will normally relate to both the exterior and interior of a building. (You may also find our *Interiors*<sup>4</sup> guidance note helpful when considering internal alterations for fire safety.)

Preparing a conservation statement or plan is a useful step in evaluating the character and significance of a historic building. A **conservation statement** identifies the cultural and historic significance of a property, while a **conservation plan** also includes a strategy for its management and conservation. Each approach aims to identify the building's significant elements or spaces, where intervention demands greatest sensitivity. Our *Guide to the Preparation of Conservation Plans*<sup>5</sup> explains more about these documents.

# 2. FIRE SAFETY MANAGEMENT

Fire safety management divides into *prevention* and, should fire ignite, *protection*. As historic buildings vary in terms of their character, usage and anticipated fire performance, so fire safety management must vary in its approach.

A tailored strategy should be prepared following a careful study of the building. This strategy will usually involve a combination of management practices, structural interventions and protective systems. A professional fire engineer can advise in more complex situations.

A good understanding of a building's character and its specific fire risk(s) is necessary to assess the need for, and the impact of, proposed intervention measures. Interventions should be:

- Compliant with legislation
- Essential
- Commensurate with risk
- Sensitive
- Minimally invasive
- Reversible (where practicable)

Prevention and protection are two components of an overall integrated package of measures. Fire legislation can be applied in a flexible way to ensure sufficient protection is achieved. It is sometimes possible to accept weakness in one area if compensation can be found in other areas. In a historic building, this approach can enable inherent vulnerabilities to be addressed while minimising impact on the building's character. For example, it may be possible to compensate on the provision of escape routes by making improvements to management procedures, or to detection and alarm systems.

4 <http://www.historic-scotland.gov.uk/interiors.pdf>

5 <http://www.historic-scotland.gov.uk/conservation-plans.pdf>



### 3. UNDERSTANDING THE RISK

Risk assessment is fundamental to fire legislation and fire safety management. The majority of our historic buildings pre-date 1914, and they were normally built with less regard for fire safety than would be expected today. As a result, many of them are inherently vulnerable to fire damage due to factors like combustible construction materials, internal linings, hidden voids, undivided spaces and a history of alterations.

Under the Fire (Scotland) Act 2005<sup>6</sup>, fire risk assessments are statutorily required for all non-domestic properties, care homes and houses in multiple occupancy. Owners of private dwellings should be aware that if hosting any commercial element (weddings, for instance), they may also fall within the remit of the fire legislation.

A fire risk assessment aims first to identify and evaluate, and then to eliminate or reduce risks to an acceptable level. Its findings should include details of what interventions are necessary. For a historic building, it is particularly important to consider how best the required changes can be made in a way that protects the building's character.

From a statutory perspective, a fire risk assessment applies only to life safety, but where a historic building is involved, the assessment should be extended to address risks to property as well as to people. The five principal steps in a fire risk assessment of a historic property are listed below:

- **Identify hazards:** for instance, sources of possible ignition and fuel
- **Identify people and property at risk:** this requires a good understanding of how the building is used
- **Evaluate the risks to occupants and property:** assess existing safety measures with a view to carrying out improvements
- **Record-keeping:** a fire log book should be kept for each property, to record all fire-related events such as drills, training and maintenance checks
- **Periodically review:** it's important to review the risks and preventative measures in place, particularly when circumstances change

6 <http://www.legislation.gov.uk/asp/2005/5/contents>

## 4. FIRE PREVENTION

Fire prevention measures are the management steps taken to reduce the likelihood of a fire starting. Fire requires three basic ingredients to combust: oxygen, fuel and heat (or sources of ignition) – these elements are known as the ‘fire triangle’. Remove any one of them, and the fire will extinguish. Preventative fire safety involves eliminating potential sources of heat and fuel.

Typical preventative measures include:

- Management of open fires and maintenance of flues
- Keeping combustibles away from heat sources
- Regular testing of electrical equipment
- Managed use of portable heaters
- Management of hazardous materials and processes
- Control of high-risk areas such as kitchens
- Enforcement of a non-smoking policy
- Permit system for hot works
- Strict control of contractors and sub-contractors
- Good housekeeping (for example, refuse management)
- Control of the threat of wilful fire-raising (particularly important in empty buildings or those periodically unoccupied)

In especially significant or high risk buildings, it can be valuable to consider undertaking training drills and developing an emergency plan.

## 5. FIRE PROTECTION

Protection measures come into effect once a fire has ignited, to safeguard occupants and property by limiting the spread of the fire and aiding escape. Putting these measures in place may require physical intervention to the building. They can include compartmentation, detection, suppression, provision of first-aid firefighting equipment, emergency signage and lighting, and escape routes.

### Compartmentation

Compartmentation is the sub-division of spaces into smaller fire-tight cells. It is the most effective way to inhibit the spread of fire and smoke. However, introducing compartmentation can damage a historic building’s character – so it is usually preferable to enhance any existing compartmentation by upgrading the fire resistance of existing walls and ceilings. Modern fire-resistant materials can be applied to surfaces or inserted into voids, such as under floors. In the less important areas of a building, such as attic voids, a higher degree of intervention may be possible without much impact upon a building’s character.

Historic doors can be upgraded using intumescent paints and varnishes, intumescent strips and smoke seals – or even, where appropriate, by inserting non-combustible ‘sandwich’ panels. Whether to upgrade or replace a historic door will depend on factors such as:

- Door characteristics (wood type, thickness, condition)
- Location within the building (is it on the main escape route?)
- Required fire resistance (usually 30 or 60 minutes)

A qualified fire engineer may be able to predict the performance of historic doors in a real fire situation, taking into account how room geometry, fire load and ventilation will affect fire growth.

## Detection and alarm systems

Fire detection and alarm systems, which provide warning when a fire has ignited, can be triggered manually or automatically. Automatic systems are more effective at detecting fires in circumstances where people are not normally active – for instance, at night, or in empty or rarely used buildings or spaces. They can be configured to alert the fire service directly.

Technology continues to evolve, with an increasing selection of discreet options:

- **Beam detectors** only require a small transmitter and receiver unit, and are efficient in large spaces such as a church nave.
- **Aspirating systems** require small pipes accommodated within the fabric of the building, but the tiny holes in the ceiling through which air is sucked to a sampling unit are virtually invisible.
- **Wireless technology** can replace the need for hard wiring.



↑ An aspirating smoke-detection system was installed in the Laich Hall at Edinburgh Castle during restoration work. These systems draw air through small pipes to detect smoke. You can see the pipe here before it has been cut back to lie flush with the ceiling, forming a near-invisible detection system. © Rob Thomson



↑ Free standing signage can be designed in a variety of ways. This example is at the category A listed Abbotsford House. © Crown Copyright Historic Scotland

## First-aid firefighting

Manual first-aid firefighting equipment, such as extinguishers and fire blankets, can be used to extinguish a fire in its early stages. Equipment can be free-standing in places where fitting to a wall might damage historic fabric – or it can sometimes be enclosed in cupboards or recesses, providing they have adequate signage and staff are aware of their locations.

## Suppression systems

Automatic fire suppression systems use a variety of agents, including water, mist, foam and gas, to restrict the spread of fire and to confine it to a small area. They may also extinguish it. These systems require physical intervention into a building's fabric, so care must be taken in their design to consider factors such as:

- **Pipework:** this can be concealed under floors, in the beams of a coffered ceiling or along deep cornices. Where visible, pipes may (with the manufacturer's approval) be painted to reduce their visual impact.
- **Storage of the suppression agent:** water tanks, for example, can be housed discreetly underground, in basements or in outbuildings.
- **Location and type of discharge heads/ nozzles:** these can be exposed or fully recessed, with cover plates coloured to match their background(s).



↑ Extinguisher stands in the Great Hall at Stirling Castle. By using free-standing extinguishers, any damage to the historic fabric has been minimised. © Rob Thomson



↑ As this automatic fire suppression system head is located in the attic of the A-listed Duff House it does not require to be discretely located. These heads can, however, be fully recessed with cover plates to match their backgrounds in more sensitive historic areas.

© Rob Thomson



## Means of escape

Escape routes enable safe evacuation.

The local authority may be able to advise on the level of provision, taking into account such factors as the number and capabilities of occupants, the geometry of the building and the overall risk levels. It can be challenging to develop means of escape in existing buildings, but solutions can include:

- Converting an existing opening into an exit (where practicable, this should be on a subordinate façade in order to avoid affecting the main front of a building)
- Enclosing an existing internal stair
- Constructing a new external escape stair (again, preferably on a subordinate façade)
- Installing or upgrading an alarm and detection system
- Installing or upgrading a smoke extraction system

## Emergency escape lighting and signage

Standard emergency escape lighting and signage can look incongruous in a historic setting, but with careful consideration to design and positioning, its impact can be minimised. For instance, photoluminescent technology can be used to avoid the need for hard wiring; obsolete light fittings can be converted for re-use; or combined lighting and signage units can help to minimise hardware. Lighting and signage can be surface-mounted, recessed or suspended to suit the surroundings.

In certain building types, such as those not continuously open to the public, it can sometimes be acceptable to take a more flexible approach that makes use of free-standing exit signs and temporary lighting.

## Emergency fire action plan

An emergency fire action plan sets out the actions that occupants should take in the event of a fire. For occupants with disabilities, additional precautions – and possibly works to the building – are required to ensure safe evacuation, and a Personal Emergency Evacuation Plan is often advisable.

The Scottish Government provides advice on this in the document *The Evacuation of Disabled Persons from Buildings*.<sup>7</sup>

Historic Scotland's managing change guidance note on *Accessibility*<sup>8</sup>, which considers how to improve physical access to and within buildings, may also be helpful.

<sup>7</sup> <http://www.gov.scot/Resource/0040/00402451.pdf>

<sup>8</sup> <http://www.historic-scotland.gov.uk/accessibility.pdf>

## 6. INSURANCE

Building owners need to decide what insurance is appropriate to cover the possible risks and to protect the value of their asset. An up-to-date building valuation will help potential insurers to assess the risk more accurately. For information about insurance and listed buildings, see the factsheet<sup>9</sup> on our website.



9 <http://www.historic-scotland.gov.uk/listinginsurance.pdf>

## 7. RECONSTRUCTION AND LISTED BUILDINGS

In some cases where listed buildings have been substantially destroyed by fire, they have been restored – examples include the Ca' d'Oro building in Glasgow and Morgan Academy in Dundee – but this is not generally required by legislation. Although it can happen in exceptional circumstances, it is far from typical for a building owner and their insurance company to opt for restoration.

Partial loss is much more common. For example, the loss of a single door that forms part of the character of a listed building is likely to require replication, as a non-matching re-instatement may not be acceptable. Where the listed building formed an integral part of an important architectural group such as a terrace, the exact reinstatement of at least the exterior may be required by the planning authority in some circumstances.

See our insurance factsheet<sup>10</sup> for more information.

← A fire at the B-listed central administration block of the former Eastern General Hospital, Edinburgh in 2007 resulted in the building being severely damaged and a risk to public safety. The extent of the damage resulted in the building being delisted in 2012 and subsequently demolished. Some of the stonework has been retained for reuse on the site. © Crown Copyright: RCAHMS

10 <http://www.historic-scotland.gov.uk/listinginsurance.pdf>

## 8. SALVAGE

If the worst happens, you may want to consider the salvage and reuse of architectural features and materials. In the case of a listed building this will often be a condition of consent for demolition. Some local authorities operate architectural salvage stores, and a commercial market exists for items such as roofing slate. See our guidance note on Demolition<sup>11</sup> for more information.

## 9. CONSENTS

You may require planning permission, building warrant(s) and other permissions or consents for any proposed scheme. The granting of scheduled monument consent or listed building consent does not negate this requirement, and you should contact your planning authority for advice.

### Listed building consent

Listed building consent is required for any work to a listed building which will affect its character (see the **Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997**).<sup>12</sup> The planning authority is the main point of contact for all applications for listed building consent. They decide whether consent is required, and they can also offer advice on applications.

The planning authority will consider applications using guidance such as Historic Scotland's managing change guidance notes and other national policy documents including SHEP<sup>13</sup>, SPP<sup>14</sup> and their own policies.

11 <http://www.historic-scotland.gov.uk/demolition-2.pdf>

12 <http://www.legislation.gov.uk/ukpga/1997/9/contents>

13 <http://www.historic-scotland.gov.uk/shep-dec2011.pdf>

14 <http://www.gov.scot/Publications/2014/06/5823>

## 10. SEARCHING FOR LISTED BUILDINGS AND OTHER DESIGNATIONS

### Scheduled monument consent

Scheduled monument consent is required for any works to a monument scheduled under the **Ancient Monuments and Archaeological Areas Act 1979**<sup>15</sup>. Scheduled monument consent is determined by Historic Scotland.

We offer a free pre-application discussion and checking service for scheduled monument consent applications. You can find out more about this on our **website**<sup>16</sup>.



↑ Historic doors can be upgraded in a variety of ways. In this reading room at the category B listed National Library of Scotland cold smoke seals have been run along the stile. © Crown Copyright Historic Scotland

You can search for listed buildings, scheduled monuments, battlefields, gardens and designed landscapes on our **website**<sup>17</sup> (please read the guidelines on the search page). If you are still not sure whether you are designated, you can also email or telephone us for help.

For a map-based search and wider environmental information, including conservation area boundaries, see the **Scotland's Environment**<sup>18</sup> website. You can also ask your local authority to tell you whether you are listed and what is covered by the listing.

<sup>15</sup> <http://www.legislation.gov.uk/ukpga/1979/46>

<sup>16</sup> <http://www.historic-scotland.gov.uk/index/heritage/searchmonuments/scheduledmonumentconsentprocess.htm>

<sup>17</sup> <http://data.historic-scotland.gov.uk/pls/htmldb/f?p=2000:10:0:>

<sup>18</sup> <http://www.environment.scotland.gov.uk/>





↑ Above: Morgan Academy, Dundee, as fire swept through it in 2001  
© PhotoShopScotland

# 11. FURTHER INFORMATION AND ADVICE

Historic Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of our roles is to provide advice about **managing change** in the historic environment.

## Legislation and policy

Building (Scotland) Act 2003<sup>19</sup>

Fire (Scotland) Act 2005<sup>20</sup>

Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997<sup>21</sup>

Ancient Monuments and Archaeological Areas Act 1979<sup>22</sup>

Scottish Planning Policy (2014)<sup>23</sup>

Scottish Historic Environment Policy (2011)<sup>24</sup>

## Guidance

Historic Scotland Guide for Practitioners 7: Fire Safety Management in Traditional Buildings<sup>25</sup>

Historic Scotland Guide for Practitioners 6: Conversion of Traditional Buildings: Application of the Scottish Building Standards<sup>26</sup>

Historic Scotland Inform Guide: Fire Safety<sup>27</sup>

Historic Scotland Short Guide on Fire (due to be published in Autumn 2015)

Further information and guidance on fire legislation is available from the Scottish Government's FireLaw<sup>28</sup> website.

19 <http://www.legislation.gov.uk/asp/2003/8/contents>

20 <http://www.legislation.gov.uk/asp/2005/5/contents>

21 <http://www.legislation.gov.uk/ukpga/1997/9/contents>

22 <http://www.legislation.gov.uk/ukpga/1979/46>

23 <http://www.gov.scot/Publications/2014/06/5823>

24 <http://www.historic-scotland.gov.uk/shep-dec2011.pdf>

25 <http://conservation.historic-scotland.gov.uk/publication-detail.htm?pubid=7370>

26 <http://www.historic-scotland.gov.uk/guide-for-practitioners-6.pdf>

27 <http://www.historic-scotland.gov.uk/informguide-fire.pdf>

28 <http://www.gov.scot/Topics/Justice/policies/police-fire-rescue/fire/FireLaw>



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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

Gardens and Designed Landscapes

September 2016







Above: Ardtornish, Highland (GDL00024). A new biomass boiler was recently constructed within the Inventory site. The planning application was accompanied by a design and access statement which addressed the impact of the proposed change, set against the significance of the site. The resulting building has been carefully located and designed to minimise its impact on the designed landscape and the setting of the listed house. © Jennie Robertson

Cover image: Colonsay House, Argyll & Bute (GDL00106). An informal designed landscape containing an extensive woodland garden of outstanding horticultural value set within the rugged Hebridean landscape. © Historic Environment Scotland

# MANAGING CHANGE IS A SERIES OF NON-STATUTORY GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. THEY EXPLAIN HOW TO APPLY GOVERNMENT POLICIES.

The aim of the series is to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.

# INTRODUCTION

This note sets out the principles that apply to developments affecting Inventory gardens and designed landscapes, and the roles and responsibilities that organisations have to care for and protect them. It should inform planning policies and help with decisions relating to planning applications affecting Inventory sites. It also provides guidance on how to manage the impact of change – respecting the inherent value of these sites in the context of a dynamic and changing environment.

The focus of this guidance note is on those sites that meet the criteria for national importance and are included on the Inventory of Gardens and Designed Landscapes. The same general principles apply to development proposals that affect gardens and designed landscapes of regional and local importance.

# KEY ISSUES

1. Gardens and designed landscapes are an important element of Scotland's historic environment.
2. The Inventory of Gardens and Designed Landscapes is a list of nationally important gardens and designed landscapes. Sites on the Inventory are given special consideration in the planning and other land-use systems (such as long-term forestry planning).
3. The Inventory identifies gardens and designed landscapes of national importance, and provides information on them. It informs the management of change in these areas.
4. To ensure that the most important gardens and designed landscapes survive, change should be managed to protect and, where appropriate, enhance the significant elements.
5. Planning authorities should take gardens and designed landscapes into account when preparing local development plans and making decisions on planning applications.
6. Planning authorities are also encouraged to develop policies to identify and manage regionally and locally important (non-Inventory) gardens and designed landscapes.

# I. THE SIGNIFICANCE OF GARDENS AND DESIGNED LANDSCAPES

7. All public bodies should take Inventory sites into account when preparing plans, policies and strategies.
8. Landscape management plans help to develop a longer-term vision for engaging owners and land managers in managing change sensitively.

The Necropolis, Glasgow (GDL00366). Set on a prominent hill above Glasgow Cathedral, this is one of Scotland's first planned garden cemeteries and contains outstanding architectural features by eminent designers such as Thomas Hamilton and Alexander 'Greek' Thomson. © Historic Environment Scotland



Gardens and designed landscapes are a significant element of Scotland's historic environment. Legislation defines them as grounds that are consciously laid out for artistic effect. They usually include a combination of planting, land-forming (for example creating artificial slopes), built structures, open grounds, water management and natural landscape features. All of these may contribute to the value of the site.

Gardens and designed landscapes contribute greatly to our culture. They enrich the texture and pattern of the Scottish landscape, and form a unique resource with complex historical, cultural and landscape components. Gardens and designed landscapes reflect centuries of social, cultural and economic change.

Many of the sites on the Inventory are living examples of unique artistic talent. They may be the setting of listed buildings and scheduled monuments, and offer rich and varied habitats for nature conservation. Some also contain important collections of rare or specimen trees, shrubs and plant material.

Gardens and designed landscapes offer significant opportunities for education, employment, tourism and recreation. They also provide a valuable green network, and make a major contribution to the wider landscape of Scotland.



## 2. THE INVENTORY OF GARDENS AND DESIGNED LANDSCAPES

Historic Environment Scotland has a statutory duty to compile and maintain the Inventory of Gardens and Designed Landscapes. There are currently over 300 gardens and designed landscapes included on the Inventory, which is available online [here](#).

The Inventory is a list of gardens and designed landscapes of national importance. They are assessed against the following criteria:

- value as individual works of art in their own right
- historical value
- horticultural, arboricultural or silvicultural value
- architectural value
- scenic value
- nature conservation value
- archaeological value.

The importance of a site depends on the extent to which each of these values is demonstrated. For each criterion, a site may be ranked as having ‘outstanding’, ‘high’, ‘some’, ‘little’ or ‘no’ value. The more values ranked as outstanding or high, the more likely the site is to be included in the Inventory. Exceptionally a site may be of such significance in just one value that it is of national importance.

The overall integrity of a site – its wholeness and coherence – is a key consideration in the selection process. This includes an assessment of condition and the survival of significant features or fabric. To merit inclusion, a garden and designed landscape must have enough overall integrity to meet the standards for national importance.

The principles of selection are set out in detail in Annex 5 of the *[Historic Environment Scotland Policy Statement \(2016\)](#)*.

Portmore, Scottish Borders (GDL00318). Policies of a historic country house comprising a mansion house, parkland, extensive woodlands and a large walled garden with glasshouses and grotto, restored to a high quality in the late 20th century. © Historic Environment Scotland. Licensors [canmore.org.uk](#).



The main purpose of the Inventory is to identify sites of national importance and to provide information on them. This is a basis for sustainable management of change through the planning system.

This guidance note sets out the principles that apply to development affecting Inventory gardens and designed landscapes. For further information on the designation, please see our publication *Scotland's Inventory of Gardens and Designed Landscapes 2016*.

Scotland's Inventory of Gardens and Designed Landscapes represents a wide range of nationally important sites, ranging from the policies of historic country houses to botanical gardens to urban parks and cemeteries.



Above: Linn Botanic Gardens, Argyll & Bute (GDL00401). The living plant collection at Linn is of outstanding horticultural importance for its size and diversity. It contains species from around the world, many of which are endangered in the wild or seldom seen in cultivation. © Historic Environment Scotland

Below: Baxter Park, Dundee (GDL00051). This 19th-century public park is the only complete park wholly designed by Sir Joseph Paxton in Scotland. © Historic Environment Scotland



### 3. LEGISLATIVE AND POLICY CONTEXT

Historic Environment Scotland maintains the Inventory of Gardens and Designed Landscapes. This is in line with the Ancient Monuments and Archaeological Areas Act (1979), and is a statutory duty of the organisation.

National planning policy states that change in the historic environment should be sensitively managed to minimise adverse impacts. Changes to gardens and designed landscapes should seek to protect and, where appropriate, enhance the historic environment. Development proposals should maintain the specific qualities, character and integrity of the site.

Planning authorities are encouraged to include appropriate policies in their development plans to identify the Inventory sites in their area and outline how these sites will be protected and, where appropriate, enhanced. They are also encouraged to develop policies within their development plans for the identification and future management of regionally and locally important (non-Inventory) gardens and designed landscapes in their areas.

When a site is included on the Inventory it becomes a material consideration in the planning process. This means that those making decisions on planning applications have to take it into account. No additional consent is needed for undertaking works within a garden and designed landscape that is included on the Inventory.

Planning authorities have to consult Historic Environment Scotland on proposed developments that might affect an Inventory site. They should then take Historic Environment Scotland's advice into account when deciding whether permission should be granted.

Some types of development that do not normally require a planning application may need it if the development site is in a garden and designed landscape. Planning authorities can advise on whether an application is needed.

When making decisions about development that could affect an Inventory site, planning authorities have to consider national and local policies for planning and the historic environment.

Castle Kennedy, Dumfries & Galloway (GDL00093).  
© Historic Environment Scotland. Pre-application discussion to consider new development proposals.



## 4. ROLES AND RESPONSIBILITIES

All public bodies have a responsibility for the care and protection of gardens and designed landscapes. Some have specific roles to play in this process at national or local level.

The Scottish Government sets the national policy for planning and the historic environment. These policies are then a consideration for national and local bodies. Scottish Planning Policy informs the content of planning proposals, and encourages public bodies to keep up-to-date information on gardens and designed landscapes, and assets within them.

Historic Environment Scotland maintains the Inventory of Gardens and Designed Landscapes. It also gives advice on managing change affecting Inventory sites.

Organisations that make decisions about development are legally required to consult Historic Environment Scotland if changes could affect an Inventory garden and designed landscape.

Historic Environment Scotland's primary role is to advise on development that requires planning permission when requested by a planning authority. It does not have a role in the day-to-day running and maintenance of Inventory gardens and designed landscapes. There is no requirement to involve Historic Environment Scotland in the removal of individual trees, rhododendron clearance

and new planting layouts, although it can offer advice or guidance.

Planning authorities have an important role in protecting gardens and designed landscapes as the decision maker in planning applications. This applies to Inventory and non-Inventory sites. They should also consider gardens and designed landscapes in their development planning processes. This should include defining appropriate local policies and considering impacts on gardens and designed landscapes when identifying future development strategy.

Public bodies who have a responsibility for land management have to consider Inventory sites when they put together plans, policies and guidance. This allows them to manage appropriately any changes affecting gardens and designed landscapes.



## 5. GUIDING PRINCIPLES ON MANAGING CHANGE

Gardens and designed landscapes are by their nature evolving. Including a site on the Inventory helps to ensure that change is managed in an appropriate way. It encourages owners, developers and decision makers to protect and enhance the positive qualities and significance of a site and its constituent elements. This means seeking to retain key landscape features and characteristics for the future, while allowing the landscape to adapt. Carefully managed change will ensure that the elements which justify the designation of a site are protected and, where appropriate, enhanced.

Effective pre-application discussion is one of the best ways to make sure that gardens and designed landscapes are given appropriate consideration in plans and proposals. This process allows Historic Environment Scotland to give clear advice on the information necessary to support proposals at an early stage.

To manage change effectively, it is important to understand the effects it is likely to have. We recommend that this process is undertaken in three stages:

- **Identify:** understand the significance of a garden and designed landscape and identify the current baseline.
- **Assess:** assess the potential impact of a proposed change on the site and its setting.
- **Mitigate:** identify options to avoid, reduce or compensate for adverse impacts, and to enhance positive benefits.

### Stage 1: Identify the baseline

Each Inventory site description sets out clearly the criteria against which it was assessed for national importance. Although this provides a useful starting point in understanding the significance of a garden and designed landscape, more detailed information may be required in support of a development proposal. This could include design statements or landscape management plans.

### Design statements

Applicants should provide a design statement to inform the decision-making process. The statement should address the impact of proposed change, set against the significance of the site. The methodology and level of information should meet the circumstances of each case but the finalised proposals should seek to avoid, minimise and mitigate detrimental impacts on the site, and enhance positive benefits.

## Landscape management plans

Planning authorities are encouraged to obtain landscape management plans for gardens and designed landscapes. These are commissioned by owners and should be undertaken by suitably qualified and experienced professionals. They should incorporate historic landscape appraisals and statements of significance and identify long-term conservation needs. They can then be used to direct how change can be best accommodated – where sympathetic development might be appropriate and where development would be detrimental. In cases of divided ownership, a landscape management plan can promote management solutions that protect the integrity of the whole garden and designed landscape.

Historic Environment Scotland can offer grants towards the cost of management plans for Inventory sites.

More information is available on our website [\*here\*](#).

## Stage 2: Assess the impact

Inventory entries identify the values for which sites are designated. It is important to consider these in detail when assessing the impact of development. Any impact that might compromise these values should be avoided.

Planning authorities should consult Historic Environment Scotland when development may affect an Inventory site. Historic Environment Scotland will consider the impact that development would have on the site. This includes impacts on the specific qualities, character and integrity of an Inventory site, and the capacity of the Inventory site to accommodate the change proposed.

These impacts are normally defined in three broad categories:

- **Direct:** physical changes within an Inventory site boundary
- **Setting:** changes to land outside the boundary that makes a contribution to the experience, appreciation and understanding of an Inventory site
- **Cumulative:** development or alterations which combine with existing impacts and make them more significant.

Any of these types of change may alter people's experience, appreciation or understanding of a garden and designed landscape.

## Direct impacts

Direct impacts are physical changes within the boundary of an Inventory site. They might include changes to significant features, key views or the character of the landscape.

Significant features of a garden and designed landscape are likely to include both built structures and planting – including planting layouts or significant trees. These can be damaged or destroyed by development that has not been carefully designed. There can also be impacts on the long-term viability of trees and other plants.

Many gardens and designed landscapes have important views to, from or within the site. These may include viewpoints where long views are available, related views between significant features within the site, and sequential views.

Sites on the Inventory will also contain areas of deliberately contrived character, such as drives, gardens, parkland and woodland. Changes to land use and land cover in these areas can have an impact on the overall character of a garden and designed landscape.

Structures and features within designed landscapes may also have heritage value individually. The setting of listed and unlisted buildings, scheduled and unscheduled archaeology can be affected by development within Inventory sites.

Other types of development, not all of which require planning permission, can have a significant impact on gardens and designed landscapes. These include parking, fencing, signage, lighting, new planting, earth movement, service infrastructure, paths and pavements, and new roads and drives. All such developments should be carefully designed to minimise their impact on Inventory sites.

Sympathetic developments in walled gardens can present a particular challenge. Development should be carefully designed to take into account the special qualities and characteristics of a walled garden. For example, new development should not exceed the height of the walls, and the number and size of new openings in the wall should be limited. Finding a future sustainable use for walled gardens does not necessarily have to mean ‘development’; there is an increasing interest in re-using them as horticultural spaces.



Fasque House, Aberdeenshire (GDL00178).  
The Apple House in the Walled Garden before and  
after restoration. The building now serves as holiday  
accommodation. © Historic Environment Scotland.  
Licensor canmore.org.uk





## Impacts on setting

Inventory sites often have a planned relationship with landscape features beyond their boundaries, and these surroundings may contribute to the way they are experienced, understood and appreciated. Land outwith the boundary may provide a backdrop to a mansion house or terminate a vista. This 'borrowed' land is used as a feature to be enjoyed from the Inventory site.

Development outside an Inventory site boundary may therefore impact on the site's setting – for example, if it would affect a deliberately planned outward view. Proposals should be carefully designed and located to minimise any such impacts.

For further information on setting, see Historic Environment Scotland's [\*Managing Change in the Historic Environment: Setting\*](#).

## Cumulative impacts

New development affecting Inventory sites is assessed on its own merits. Sometimes development impacts that are acceptable in isolation combine to create a significant cumulative impact, eroding a site's integrity.

For example, a single dwelling in an Inventory site may not have a significant impact, but the construction of a series of houses over time may change the site's character – making it a residential area rather than a garden and designed landscape. Cumulative impacts could also include incremental changes that erode or distract from key views or relationships between features in the site.

Kinross House, Perth & Kinross (GDL00247). One of the earliest and best-known examples in Scotland of the use of the surrounding landscape in a garden design. Sir William Bruce laid out the house and designed landscape in the late 17th century with a planned axial alignment towards the castle in Loch Leven, a historic building and landscape feature beyond its boundary.  
© Historic Environment Scotland. Licensor canmore.org.uk



### Stage 3: Mitigate and enhance

Good practice for mitigating adverse impacts identifies a hierarchy of preferred options. The highest of these is to avoid impacts. Where this is not possible, developers should aim to reduce impacts through design.

Proposals should also identify enhancement opportunities where possible. Such measures are likely to be considered as compensatory. This is the least preferred option, and should only be considered as mitigation when opportunities for avoidance and reduction have already been explored.

#### Mitigating impact by careful design

Proposed development should seek to avoid significant adverse impact on Inventory sites. Where this is not practical, impacts should be mitigated by careful design. A number of factors can contribute to this process:

- **Site selection:** development should avoid the more sensitive parts of an Inventory site.
- **Development layout:** existing site features, topography and established policy woodland should be used to minimise adverse visual or other impacts.

- **Building design:** form, orientation, massing, height and materials of new structures should take account of the specific qualities and character of the site.
- **Landscape design:** well-planned and executed landscape design may reinforce or enhance existing landscape features and character, and help to accommodate development within the site.
- **Screening:** screening can be effective in certain situations. New areas of policy woodlands or specimen trees can help blend a new development into its surroundings, enhance the planted element of a garden and designed landscape and ensure its long-term survival. However, if implemented without an understanding of the essential character of the garden and designed landscape, screening can sometimes increase the visual impact of a new development. A well-designed building that has been carefully located to sit comfortably in the garden and designed landscape may not require any screening, as demonstrated below.

Abbotsford, Scottish Borders (GDL00001). The new Visitor Centre was designed to sit comfortably in its designed landscape setting and has not required substantial screening. © Photo by Paul Zanre: pzphotography.com.



Pre-application engagement should include discussion of how measures to avoid or reduce adverse impacts will be applied. Sometimes, adverse impacts cannot be mitigated and will have to be taken into account when deciding whether to grant planning permission.

### Identifying opportunities for enhancement

Opportunities to enhance gardens and designed landscapes should be identified as early as possible. Such measures are unlikely to avoid or reduce impacts, but may provide benefits for the historic environment.

Development has the potential to add value where it includes the repair and restoration of important elements of an Inventory site. This can be guided by a landscape management plan, which will identify and prioritise works to protect and enhance the special qualities of an Inventory site.

Targeted land management can also bring benefits such as removal or relocation of woodland infill to re-open important views or restore areas of parkland. Historic Environment Scotland can offer advice and guidance on proposals at the request of the planning authority.



Penicuik, Midlothian (GDL00311). View from Old Penicuik House towards the Ramsay Monument before and after the felling of 20th-century woodland and reinstatement of the Chinese Gates. A key view within the Inventory site has been re-opened.  
© Historic Environment Scotland



## 6. CLIMATE CHANGE

Gardens and designed landscapes are a fragile resource and are vulnerable to the threat of climate change, and new pests and diseases. New plant diseases and pests can have a devastating impact on planted elements within gardens and designed landscapes, for example resulting in the loss of mature policy woodlands or specialist horticultural collections.

Similarly, changing weather patterns associated with climate change, such as increased frequency and intensity of rainfall and storms, can cause significant erosion, landslip and destruction of mature woodlands within Inventory sites.

Historic Environment Scotland is responding to the issue of climate change and its impact on the historic environment. For further information on our role and research strategy, see our [website](#).

Windblown tree within a designed landscape.  
© Historic Environment Scotland.





## 7. CONSENTS

Some elements within Inventory gardens and designed landscapes may have individual designations, such as listed buildings, scheduled monuments or natural heritage assets. You can check this online on the [Scotland's Environment website](#).

### Listed buildings

Listed building consent is required for any work to a listed building which will affect its character: see the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. The planning authority is the main point of contact for all applications for listed building consent. It decides whether consent is required, and can offer advice on applications.

The planning authority will consider applications using guidance such as Historic Environment Scotland's Managing Change in the Historic Environment series and other national policy documents including Historic Environment Scotland Policy Statement (2016) and Scottish Planning Policy (2014).

### Scheduled monuments

Scheduled monument consent is required for any works to a monument scheduled under the Ancient Monuments and Archaeological Areas Act 1979. Scheduled monument consent is determined by Historic Environment Scotland. We offer a free pre-application discussion and checking service for scheduled monument consent

applications. You can find out more about this on our [website](#).

### Natural heritage assets

Sites of Special Scientific Interest (SSSI) are those areas of land and water designated for the special interest of its flora, fauna, geology or geomorphological features. This is a statutory designation made by Scottish Natural Heritage (SNH) under the Nature Conservation (Scotland) Act 2004. Further information can be found on [SNH's website](#).

Cowden Japanese-style Garden, Clackmannanshire (GDL00402). The vision of Ella Christie, a female explorer in the early 20th century, the garden was designed and maintained by Japanese practitioners. Despite vandalism in the 1960s, much of its essential structure endured. It is an exceptional representative of the Japanese-style garden tradition in the UK. Restoration started in 2013, guided by a conservation management plan. © Sara Stewart



## 8. FURTHER INFORMATION AND ADVICE

Historic Environment Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of our roles is to provide advice about managing change in the historic environment.

### Policy

Relevant policies for Inventory Gardens and Designed Landscapes can be found at: [Scottish Planning Policy \(2014\)](#)

[Historic Environment Scotland Policy Statement \(2016\)](#)

[Our Place in Time – The Historic Environment Strategy for Scotland](#)

Advice on how to handle archaeological matters as part of the planning process:

[Planning Advice Note 2/2011: Planning and Archaeology](#)

### Guidance

Inventory of Gardens and Designed Landscapes:

Historic Environment Scotland's webpage providing information on the Inventory can be found [here](#).

Historic Environment Scotland, [Scotland's Inventory of Gardens and Designed Landscapes in Scotland: A Guide for Owners, Occupiers and Managers 2016](#)

Landscape management plan grants:

[www.historicenvironment.scot/grants-and-funding/our-grants/landscape-management-plan-grants-scheme](#)

Planning authority contacts:

[www.scotland.gov.uk/Topics/Built-Environment/planning/Roles/Planning-Authorities/Information](#)

Local historic environment records are a primary source of historic environment data.

[PASTMAP](#) is a website developed to identify heritage sites.

[HLAMap](#) is a website presenting data from the Historic Land-use Assessment which analyses and records the visible traces of past land use within the Scottish landscape.

Forestry Commission Scotland: The [historic environment pages](#) contain useful information, advice and guidance on all aspects of the historic environment in Scotland's woodlands and forests. This includes a practice guide:

[Conserving and managing trees and woodlands in Scotland's designed landscapes](#).

Scotland's Garden and Landscape Heritage is a national charity formed to promote and protect the historic gardens and designed landscapes of Scotland: [www.sglh.org](http://www.sglh.org)

J. Watkins and T. Wright, The Management and Maintenance of Historic Parks, Gardens and Landscapes (London, 2007)

Dawyck, Scottish Borders (GDL00134). A historic arboretum managed by the Royal Botanic Garden, Edinburgh. The visitor centre sits sympathetically in its wooded designed landscape setting.  
© Historic Environment Scotland.



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ENVIRONMENT  
SCOTLAND

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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

## Historic Battlefields

August 2016





Above: Most of Culloden battlefield lay under forestry until clearance by the National Trust for Scotland in the 1980s. While some areas remain planted, the positive impact of this clearance on our appreciation of the battlefield can be seen clearly in this image.  
© National Trust for Scotland, Culloden.

Cover image: The scene of the Battle of Glenshiel. In 1719 the Government and Jacobite armies clashed in the narrow pass seen here. © Historic Environment Scotland (Aerial Photography Collection)

# MANAGING CHANGE IS A SERIES OF NON-STATUTORY GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. THEY EXPLAIN HOW TO APPLY GOVERNMENT POLICIES.

The aim of the series is to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.

# INTRODUCTION

This document provides advice for planning authorities, public bodies and others involved in planning and land management activities. It should be used when considering the impact of proposed development on sites appearing in the *Inventory of Historic Battlefields*. The main aims of the document are to set out:

- the significance of battlefields as nationally important historic environment assets
- the policy context for the protection of battlefields
- an approach for preparing and assessing development plans and other land-use proposals affecting battlefields
- the criteria which should be applied when making decisions relating to planning applications and other land-use planning proposals.

The focus of this guidance note is sites included in the *Inventory of Historic Battlefields*. However, the same general principles apply to development proposals affecting historic battlefields of regional and local importance.

# KEY ISSUES

1. Battlefields hold a significant place in our national consciousness and have strong resonance in Scottish history and culture.
2. Nationally important battlefields are recorded in the *Inventory of Historic Battlefields*. These battlefields are given special consideration in the planning system and other land-use systems (such as long-term forestry planning).
3. The *Inventory of Historic Battlefields* identifies battlefields of national importance, and provides information on them. This resource informs the management of change in these areas, through land-use systems, including the planning system.
4. All public bodies should take historic battlefields into account when preparing plans, policies and strategies.
5. Planning authorities should take historic battlefields into account when making decisions on planning applications and preparing local development plans.
6. Impacts on historic battlefields should be fully assessed when changes are proposed.



# I. THE SIGNIFICANCE OF HISTORIC BATTLEFIELDS

Historic battlefields hold a significant place in our national consciousness and have strong resonance in Scottish culture. They are valued for being the sites of significant historic events.

The site of a battle can contain upstanding or archaeological remains associated with the event. These may include the remains of people who fought in the battle. The landscape of a battlefield can help us to understand why events happened as they did.

Historic battlefields are also places where people can commemorate and

learn about our history, and recognise the significance of past events. They make an important contribution to the economy, education and society of the country.

The battles and their associated history are often known throughout the world, and are promoted by Scotland's tourism industry. They offer opportunities to promote our history and culture to people around the world, and reinforce a sense of place and identity for those living and working in Scotland.

The scene of the Jacobite's famous Highland Charge at Killiecrankie; the terraced slope provided cover from Government fire. © Historic Environment Scotland.



## 2.THE INVENTORY OF HISTORIC BATTLEFIELDS

The *Inventory of Historic Battlefields* is a major online resource that provides information on battle sites in Scotland. It aims to raise awareness of their significance and to assist in their protection and management for the future by furthering:

- understanding and appreciation
- education and research
- community and visitor interest.

The information given in the Inventory reflects current understanding, based on up-to-date research. Any proposed development changes should be assessed against this record.

A battlefield is defined as an area of land over which a battle was fought, or an area of land on which significant action related to a battle took place. The Historic Environment Scotland Policy Statement gives a full explanation of how historic battlefields are selected for the Inventory.



Soldier's Leap, Killiecrankie, well-visited scene of a popular tale of a soldier's bid to escape in the aftermath of the battle. © Historic Environment Scotland.

The criteria are:

- **Historical associations:** the battlefield should have strong associations with historical events or figures of national significance.
- **Physical remains:** there should be some significant physical remains of the battle, or archaeological potential for remains.
- **Landscape of the battle:** there should be evidence for the wider battlefield landscape around the battle site. This may include vantage points, lines of sight, earthworks, camps or burials.

It must also be possible to define the battle site with confidence on a modern map.

The Inventory brings together information about historic battlefields, and defines the geographical area considered to be of primary relevance to each one. This area includes the location of the main events of the battle, as well as associated physical remains and landscape features.

Each Inventory record describes the battlefield and the reasons for its inclusion, including details of:

- the battle and its historical context
- the importance of the battle, with reference to the criteria given above

- the area defined by the Inventory maps.

The relevant areas and locations are shown in a series of maps, which highlight significant landscape characteristics and special qualities. At the end of each record, there is a list of key source material and references used in researching the information for the Inventory. These can support further study and educational uses.



A moment of quiet remembrance at Culloden.  
© Historic Environment Scotland.







### 3. LEGISLATIVE AND POLICY CONTEXT

Historic Environment Scotland maintains the battlefield Inventory. This is in line with The Ancient Monuments and Archaeological Areas Act (1979) and is a statutory duty of the organisation.

The Inventory identifies battlefields of national importance and provides information on them. One of its key aims is to provide a basis for managing change on battlefields, by informing the planning process.

When a battlefield is included in the Inventory, the information in the Inventory record must be taken into account when making decisions on planning applications. No additional consent is needed for undertaking works within an Inventory battlefield.

Planning authorities should consult Historic Environment Scotland on proposed developments that might affect a battlefield included in the Inventory. They should then take Historic Environment Scotland's advice into account when deciding whether permission should be granted for the development. If the advice is that the development should not go ahead, the planning authority must notify Scottish Ministers of this.

Some types of development that do not normally require a planning application may need one if the development site is in a historic battlefield. Planning authorities can advise on whether an application is needed.

National planning policy states that change in the historic environment should be sensitively managed to minimise adverse impacts. Changes to battlefields should seek to protect, conserve and, where appropriate, enhance historic battlefields. If a battlefield is to accommodate modern development, its key landscape characteristics and special qualities should be retained.

When making decisions about development that could affect an Inventory battlefield, planning authorities have to consider national policies for planning and the historic environment. There is also guidance available on handling archaeological matters in planning, and managing change in the historic environment.



Glenshiel: Some of the surviving elements of the Jacobite fortifications on the northern side of the valley, which are also designated as a Scheduled Monument. Physical remains of a battle can take many forms and are an integral part of our understanding of the field of conflict. © Historic Environment Scotland.

## 4. ROLES AND RESPONSIBILITIES

All public bodies have a responsibility for the care and protection of historic battlefields. Some have specific roles to play in this process at national or local level.

The Scottish Government sets the national policy for planning and the historic environment, which is then a consideration for national and local public bodies. Scottish Planning Policy informs the content of planning proposals, and encourages public bodies to keep up-to-date information on battlefields and historic assets within them.

Historic Environment Scotland maintains the *Inventory of Historic Battlefields* and also gives advice on managing change to areas within Inventory battlefields. Organisations that make decisions about development are legally required to consult Historic Environment Scotland if changes could affect an Inventory battlefield.

Planning authorities have an important role in protecting historic battlefields as the decision maker in planning applications. This applies to Inventory and non-Inventory battlefields. They should also consider battlefields in their

Covenanter's Field, Bothwell Bridge, where archaeological investigations have confirmed that fighting took place. © Historic Environment Scotland.



## 5. DEVELOPMENT PLANNING PROCESS

development planning processes. This should include defining appropriate local policies, and considering impacts on battlefields when identifying future development strategy.

Public bodies who have a responsibility for land management have to consider Inventory battlefields when they put together plans, policies and guidance. This allows them to manage change on battlefield sites appropriately.

Strategic and local development plans should set out policies and criteria that apply to the protection, conservation and management of Inventory battlefields. Planning authorities should refer to these policies when considering planning applications.

Spatial strategies also need to reflect local and national policy on battlefields. When developing strategies, planning authorities therefore need to consider potential impacts and the capacity of Inventory battlefields to accommodate development without damage to their key landscape characteristics and special qualities. This process should follow similar principles to those outlined in the section on the development management process in Section 6.

Killiecrankie: looking from the remains of buildings at Croft Carnoch, the probable position of the Jacobite snipers in the early stages of the battle, towards the Government position. The relationship between these elements of the battlefield is vital to continued understanding of key events of the battle.  
© Historic Environment Scotland.



## 6. DEVELOPMENT MANAGEMENT PROCESS

Development on a battlefield can have an impact on the physical remains of the battle or the landscape of the battlefield. The development management process should identify and assess these impacts, and if possible mitigate them. There are three key stages in this process, as laid out below.

Pre-application discussions are an important part of the development management process. Early and meaningful engagement often means that a project can move forward more efficiently. It can also allow planning authorities to identify unacceptable proposals early on, before significant

costs have been incurred. The earlier this process starts, the more productive it is likely to be.

Including a battlefield in the Inventory is not intended to be simply a barrier to development. The intention is to identify an area of added protection where particular consideration must be given to impacts on the site. This should focus on the special qualities and landscape characteristics of the battlefield. Planning authorities have to consider proposals carefully, and determine whether development will significantly detract from the importance of the battle site.

Commemoration is an important part of respecting battlefields, as here at Bannockburn where memorialisation forms part of the visitor experience.  
© National Trust for Scotland, Bannockburn.







Above: Bankton House, a listed building, featured in events of the Battle of Prestonpans.  
© Historic Environment Scotland.



Above: The memorial cairn at Culloden, erected in 1881. © Historic Environment Scotland.

We recommend that the development management process is undertaken in three stages:

- **Identify:** identify the current baseline of the site by assessing the area, or undertaking a site audit.
- **Assess:** define how the impact of the development will be measured, and assess how the site will be affected by the proposed development.
- **Mitigate:** identify ways to avoid, reduce or compensate for negative impacts through location, design or enhancement measures.

This process will allow developers to submit clear and useful information as part of any application for consent. This should explain the issues and demonstrate that the application is in line with the relevant policies.

## Stage 1: Identify the baseline

New proposals or land allocations should be evaluated as early as possible to inform the design and assessment process. A qualified and experienced professional should carry this out, using methodologies that are appropriate for assessing battlefield sites. This should be done first, to identify the current baseline, as any impacts of development will be measured against this starting point.

The starting point for information on the baseline of a battlefield is the record in the battlefield Inventory. The assessor should fully understand the record including the reasons for the battlefield's inclusion in the Inventory. This should cover details of buried and upstanding physical remains, and the landscape context of the battle. Other historic environment records and datasets should also be checked at this stage.

The aim of this early stage of assessment is to identify whether a proposal will have an impact on the battlefield. This impact could be on the physical remains, the landscape context, or both. To assess this it is necessary to look carefully at both the development site and its wider context in the battlefield.

This assessment can be split into three categories. Key considerations for each are given below.

### (a) Character and context

The assessment should focus on identifying important factors about the battlefield:

- previous development on the site
- topography, land cover and boundaries
- known or potential physical remains
- key views of, from, or across the site.

A metal-detecting survey was undertaken at Prestonpans as part of a structured programme of archaeological investigation. © Historic Environment Scotland.

### (b) Other heritage assets

Other factors might need assessment at this stage: for example, assets associated with the battlefield, or unrelated designations such as scheduled monuments, which might need consent for works in addition to planning permission. It is particularly helpful to identify this at an early stage.

### (c) Development

The nature of the development itself will be a factor in identifying the potential impact of proposals. For example, developments of larger scale or height are more likely to affect key views. Important factors might include:

- size and footprint
- proposed use
- design and layout
- landscaping proposals.



## Stage 2: Assess the impact

There are many separate factors to consider when assessing impacts on a battlefield. Each battlefield has its own key landscape characteristics, specific physical qualities and archaeological potential.

It is also important to identify less tangible values. Battlefields often contribute to a sense of place or cultural identity, and people use them as places of commemoration and remembrance. These issues might be appreciated at a local, national or even international level.

All of these values should be balanced in relation to the whole of the battlefield when assessing the impact of development. To be in line with national planning policy, any adverse impacts on Inventory battlefields should be minimised. Adverse impacts can affect any of the values of a battlefield. Different types of impact should be identified and assessed:

- **Direct:** alteration to the special qualities of the battlefield, such as damage to archaeological or other physical remains or features
- **Contextual:** changes to the key landscape characteristics such as interruption of key views or alterations to the character of the landscape
- **Cumulative:** adding to existing negative effects from other development that has been built or is planned.

Any of these impacts can reduce our appreciation and understanding of a battlefield. It is particularly important

to avoid impacts that compromise factors that were among the reasons for including the battlefield in the Inventory.

Each category of impact should be considered separately, along with any other relevant factors.

### (a) Direct impact on special qualities

Special qualities are the physical features within the battlefield area. These can include upstanding buildings and memorials, as well as known or potential areas of archaeological remains. Landscape features such as enclosures, defensive banks and ditches might also be included if they played a significant role in the battle.

Special qualities do not have to be contemporary with the battle. Recent memorials to a battle or individuals involved in it are often significant features in the current landscape of a battlefield. Such memorials can be a focus for commemoration or remembrance, and make a clear contribution to our understanding and appreciation of the battlefield.

Not all parts of a battlefield will contain archaeological remains or upstanding features. The most likely places to find physical remains are areas where:

- the main conflict or smaller engagements took place
- camps were made
- graves are located
- troops advanced or retreated.

Remains and features are most likely to have survived in areas that have not been disturbed by previous development. Sometimes the only surviving evidence may be spreads of shot and battle debris.

Development should aim to avoid significant loss or damage to key built or archaeological remains. The assessment of direct impacts on special qualities should identify these effects.

To do this, the assessment should consider the significance of the archaeological potential of the development area in relation to the overall battlefield. This process will be informed by professional judgement, with reference to the Inventory and other relevant sources.

If a section of a battlefield is already developed, it is likely that archaeological remains in that area will be compromised. Further development in these areas could still lead to additional loss or damage, which may be significant in some cases. The assessment should therefore consider these impacts.

Not all remains within a battlefield will necessarily relate to the battle itself. As battle sites often cover large areas, there may be earlier or later remains which are of heritage value. Making this distinction requires professional judgement. These remains will be a relevant consideration in the overall assessment of impacts on the historic environment. Unrelated remains or features should be assessed separately from battlefield impacts.

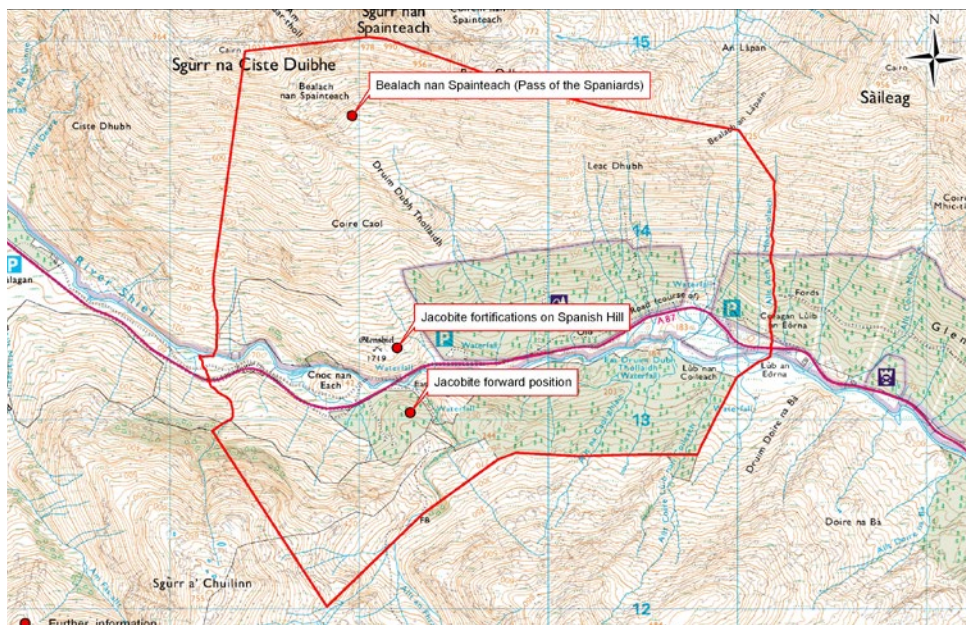
## **(b) Contextual impact on key landscape characteristics**

The terrain of a battlefield influences how and where it is fought. This landscape context helps us to understand and appreciate the battlefield. It can also provide a sense of place, contributing to remembrance and commemoration of the battle.

All landscapes change over time, because of natural processes and human intervention. However, the key characteristics of the battlefield terrain can often still be seen and understood today. These surviving elements contribute to our experience of the battle site.

Every battlefield has individual characteristics, and its ability to accommodate development will vary according to these. Battlefields can cover large complex areas, and it is not always possible or desirable to prevent all change within the battlefield area. Where development can be accommodated, it should be located and designed to conserve and enhance the key landscape characteristics of the battlefield.





Glenshiel Inventory map showing key landscape features. Wherever possible, the Inventory boundary map is supported with additional maps depicting information to assist with locating features of the battlefield mentioned in the text.

Significant impacts on landscape context can reduce our appreciation and understanding of the battlefield. Assessments should report any potentially significant impacts on the following factors:

- **Integrity:** the level of preservation of the landscape context, including the survival of key views and lines of sight, and relationships between different elements of the battlefield landscape
- **Significance:** the contribution of the landscape to understanding and appreciating the battlefield, including how the terrain and topography relate to the events of the battle
- **Character:** the land form, land cover and settlement pattern within the battlefield and the surrounding terrain, including the scale of the landscape in relation to the scale of any proposed changes
- **Experience:** the contribution of the landscape to our experience of battlefield, including less tangible elements such as sense of place and resonance in local and national culture.



Statue of Robert the Bruce at Bannockburn.  
© Historic Environment Scotland.

Most development outside the battlefield boundary will not have a significant impact on the landscape context. Some proposals beyond the boundary may detract from long-distance views to or from key features in the battlefield. The principles of assessing impacts on landscape context are the same for proposals outside the boundary as within.

### (c) Cumulative impacts

New development within battlefields should be assessed on its own merits. Sometimes development impacts that are acceptable in isolation combine to create a significant cumulative impact. These impacts may be direct or contextual.

Direct cumulative impacts may include significant losses to archaeological material. This could be caused by a series of developments, or other land-use changes. Cumulative contextual impacts may include incremental changes that erode or distract from key views or relationships between features in the battlefield.

Any new development could contribute to cumulative impacts. This should be assessed, and any potentially significant impacts reported. Cumulative impacts with past, present and future development should be considered.

## Stage 3: Mitigate and enhance

Good practice for mitigation identifies a hierarchy of preferred options. The highest of these is to avoid impacts altogether. Where this is not possible, developers should aim to reduce impacts through design.

Proposals should also identify enhancement opportunities where possible. Such measures are likely to be considered as compensatory. This is the least preferred option, and should only be considered as mitigation when opportunities for avoidance and reduction have already been explored.

### (a) Design and mitigating impacts

Good design can help to avoid and reduce impacts. This can be influenced by:

- **Site selection:** development should avoid the most sensitive areas of the battlefield, and aim to preserve physical features and landscape context
- **Development layout:** landscape elements which help our understanding of the site should be avoided, and existing site features may help to minimise adverse visual impacts
- **Building design:** location, orientation, form, massing, height and materials of new buildings should take account of existing site and landscape characteristics
- **Landscape design:** well-planned and executed landscape design may reinforce or enhance existing landscape features and character, and help to accommodate development within the site

Pre-application discussion is often the best way to identify and explore ways to mitigate impacts. In some cases, it will not be possible to mitigate all impacts. For example, it may not be possible to know whether there will be a direct impact on buried archaeological remains.

If the level of impact cannot be identified before planning permission is granted, planning authorities can ensure that this is assessed through appropriate survey, excavation and recording. Further advice is given in Planning Advice Note 2/2011: Planning and Archaeology.

### (b) Identifying opportunities for enhancement

Opportunities to enhance battlefields should be identified as early as possible. Such measures are unlikely to avoid or reduce impacts, but may provide benefits for the historic environment.

Enhancement schemes can increase our understanding of a battlefield, by funding historical, archaeological or local community research. They can also help to preserve the integrity of battlefield landscapes by revealing key aspects of terrain or opening up important views. Commemorative schemes or schemes that improve access or provide interpretation can also offer community and visitor benefits.

## 7. CONTACTS AND FURTHER INFORMATION

The [\*Inventory of Historic Battlefields\*](#) is available online through Historic Environment Scotland's [\*decisions portal\*](#).

### Relevant policies for historic battlefields can be found in:

[\*Scottish Planning Policy\*](#) (2014)

[\*Historic Environment Scotland Policy Statement\*](#) (2016)

[\*Our Place in Time – the Historic Environment Strategy for Scotland\*](#)

[\*Planning Advice Note 2/2011: Planning and Archaeology\*](#) gives advice on how to handle archaeological matters as part of the planning process.

### Local Authority planning contacts:

[\*www.scotland.gov.uk/Topics/Built-Environment/planning/Roles/Planning-Authorities/Information\*](http://www.scotland.gov.uk/Topics/Built-Environment/planning/Roles/Planning-Authorities/Information)

[\*PASTMAP\*](#) is a website developed to identify heritage sites

[\*HLAMap\*](#) is a website presenting data from the Historic Land-use Assessment which analyses and records the visible traces of past land use within the Scottish landscape

The following legislation sets out consultation requirements with Historic Environment Scotland:

- Town and Country Planning (Development Management Procedure) (Scotland) Regulations (2013)
- Town and Country Planning (Neighbouring and Historic Environment) (Scotland) Direction (2014)
- Town and Country Planning (General Permitted Development) (Scotland) Amendment Order (2014)



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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

## Interiors





Above: This dramatic hallway at the category A listed Cairness House, Aberdeenshire is a masterpiece in skilfully combining spatial decoration and architectural detailing to great effect. © Crown Copyright: HES. Licensors [canmore.org.uk](http://canmore.org.uk)

Cover image: Category B listed Manor Place, Edinburgh. This change from a reception room to a kitchen has retained elements including the mantelpiece, ornate cornicing and joinery. The change can be reversed if needed in the future. © [www.nealesmith.com](http://www.nealesmith.com)

# MANAGING CHANGE IS A SERIES OF NON-STATUTORY GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. THEY EXPLAIN HOW TO APPLY GOVERNMENT POLICIES.

The aim of the series is to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.



# INTRODUCTION

This note sets out the principles that apply to alterations to the interiors of historic buildings. It should inform planning policies and help with decisions relating to applications for historic buildings. It also provides guidance on how to manage the impact of change in a sympathetic way that respects the inherent value of these buildings in the context of a dynamic and changing environment.

# KEY ISSUES

1. The interior of a historic building is important in defining its character and special interest. If a historic building has the protection of statutory listing then this includes the interior, whether or not the list description itemises interior features. Listed building consent, which is administered through local authorities, is required for any works affecting the character of a listed building.
2. The interest, experience and enjoyment of a historic interior can be derived from a number of factors including its design, structural plan and layout, the quality of its decorative scheme, materials and craftsmanship, fixtures and fittings, any associated archaeology, and historical and cultural associations.
3. Thorough and appropriately informed inspection of historic interiors is necessary to evaluate their interest fully.
4. The significance of the interior and the nature of proposed works and their impact should be carefully assessed. A Heritage Statement, and if appropriate a Design Statement, will help assess and inform the appropriateness of any proposed changes. Proposals for interior alteration should always seek to protect the character of the building.
5. Planning authorities give advice on the requirement for listed building consent, planning and other permissions.

# 1. WHY ARE HISTORIC INTERIORS IMPORTANT?

The interior makes a substantial contribution to the special architectural or historic interest of a building. Its nature, style, detailing and materials help us understand when and how a building was constructed and adapted, its social and cultural significance, what it was used for, and how this has been influenced by advances in technology and changes in fashion. Historic interiors can enrich our daily lives and wellbeing in how we use, experience and appreciate them.

This impressive Edwardian kitchen at category A listed Pollok House in Glasgow retains much of its original character while functioning as a restaurant. Its scale gives us insight into the social history and functioning of a large country house in the early 20th century.  
© [www.nealesmith.com](http://www.nealesmith.com)



## 2. IDENTIFYING THE INTEREST OF A HISTORIC INTERIOR

The significance of a historic interior, or part of an interior, is usually derived from a number of factors, including those set out in the paragraphs below. The degree to which an interior remains intact from key periods in its history, and its rarity in a broader context, are also important considerations.

### Plan form

The 'plan form' is the arrangement and division of internal spaces into rooms and circulation spaces such as halls, stairs and corridors, and is a key component of the character and special interest of any building. The interrelationship of rooms and circulation space is a reflection of the building's design, function, status and period. Where rooms are arranged to create particular spatial effects or views, the position of features such as doors, windows, fireplaces and cupboards can be significant. When the historic layout is altered, for instance to superimpose an open-plan layout, this can be harmful to the character of a building.

Room proportions are important to the integrity of a design. The size and height of a room is normally carefully proportioned to suit its historic function. For example, the size and arrangement of a principal space such as a dining or drawing room normally contrasts with the less formal or less elaborate 'private' spaces, such as bedrooms. Windows, doors and fireplaces were normally designed and located to complement the design and proportions of the room as a whole.

### Decorative schemes

The decorative treatment of a historic interior is normally an important element of a building's character, whether it is a simple functional space or a grand and imposing one. Depending on the building's type, or the location within a building, interior schemes range from utilitarian bare surfaces to elaborate applied fixtures and finishes.

Decorative schemes can illustrate much about the function/status of a room and broader stylistic movements. The design of chimneypieces, cornicing, doors and architraves were often coordinated throughout a room or a building in one style or a contemporary variety of styles. Some schemes have a theme or purpose reflecting the outlook of a patron and/or designer or reflect the use of the space.

Most interiors have been redecorated on a number of occasions, and older buildings in particular may have 'layers' of differing fashions or styles, possibly built up over generations. These later schemes may illustrate and document key periods in changes of ownership/use/patronage and often enable a fuller understanding and appreciation of the building's history, significance and interest. A Heritage Statement, and if appropriate a Design Statement, will help assess and inform the appropriateness of any proposed changes.

## Materials and craftsmanship

Even relatively modest interior spaces can display high levels of craftsmanship and quality of materials. The enormous variety of materials and skills employed in historic interiors can range from simple panelled timber doors and shutters to elaborate marble and timber fireplaces, high-quality plasterwork, intricately designed staircases and hand-painted wallpaper.

## Fixtures and fittings

Statutory protection extends to all features that form a part of the listed building. It is not necessary for the feature to be specified in the list description for it to be considered as integral to the structure and subject to the need for consent if change is proposed. Local authorities advise on whether consent is required for the removal or alteration of a feature.

Fixed objects such as staircases, chimneypieces, doors and doorpieces, timber panelling, shutters, built-in furniture, etc. are likely to be considered fixtures, integral parts of a listed building. The degree of physical attachment and the extent to which a feature is an integral part of the building are relevant factors for assessing items such as bathroom and kitchen fixtures, overmantel mirrors, overdoor paintings, window pelmets, fire grates, lighting and machinery.

Non-fixed or portable objects are not included in the statutory listing of properties.

A surviving section of 16th century painted wall panelling discovered beneath later works at category A listed Northfield House, Prestonpans. In this instance a section of the panelling has been left exposed and the later work retained. © Crown Copyright: HES. Licensor canmore.org.uk





## Archaeological potential

Early structural evidence or decorative schemes may survive below later work, possibly concealed, and the discovery of these can enhance understanding of a building's special interest. Interior structural evidence, such as timber framework, masonry vaulting, or blocked openings, can reveal much about the development of a building through time.

Common discoveries of decorative features include chimneypieces, grates and ranges in blocked fireplaces, wall and door panelling under hardboard or plasterboard finishes, and original plaster ceilings above suspended ceilings. Mural and other painted decorative schemes may also be recovered from beneath later paintwork. Where such features are found, but it has been agreed to conceal them again, they may be significant enough to merit recording. In cases where a decorative scheme cannot be recovered in full, it may be appropriate to repair, for example by replicating mouldings, or by paint sampling and matching.



This late 19th century door handle and fingerplate at an unlisted building in Esplanade Terrace, Joppa combines beauty and practicality with its ornate design and its function in protecting the door from marks and damage. Details like this are an important part of a building's character. © Royal Commission on the Ancient and Historical Monuments of Scotland; D/12556/cn. Licensor [www.scran.ac.uk](http://www.scran.ac.uk)

## Historical, cultural and social associations

The link between particular interior spaces and notable people or events in history forms a significant element of their interest. Interiors connected to important historical figures can provide an invaluable insight into their lives, inspiration and works. Similarly the context of a historical event of cultural/ social activity can be better understood when the physical surroundings are intact.

### 3. GENERAL PRINCIPLES FOR REPAIRS, ALTERATIONS AND UPGRADING

#### Character and interest

Alteration to a historic building should protect its character. The contribution of the interior to that character must therefore be fully understood before considering how to alter the building. A Heritage Statement, and if appropriate a Design Statement, may help assess and inform the appropriateness of any proposed changes.

#### Significance of the interior spaces

Alterations should be carefully planned and located to best protect the interest of the internal spaces. In general, the principal spaces in a building are more sensitive to change as these are the spaces that normally make the most significant contribution to its character. Sometimes secondary spaces such as basement kitchens or attic rooms are sensitive to change, for example where they survive in their original form, or are particularly noteworthy.



Category A listed George Square, University of Edinburgh. A comprehensive refurbishment scheme to refresh this post-war building, including the basement area repurposed as a lively social hub. New design elements have taken their cue from the original 1960s design features such as the original waffle concrete ceiling which has been retained with the addition of some decorative timber light boxes. [www.andrewleephoto.com](http://www.andrewleephoto.com)

## Subdivision and amalgamation of spaces

Where the original plan form or a later plan form of special interest survives, particularly in regard to the entrance hall, main stair, common spaces and principal rooms or spaces, these spaces should normally be retained without subdivision, because of their inherent significance. Likewise, it is usually advisable to avoid the amalgamation of rooms, or the creation of an 'open-plan' layout, within a historic building with an important cellular plan form. There may, however, be more scope to make significant interventions within areas of secondary importance.

When planning new openings between rooms or circulation spaces it is important to take account of the historic design and layout, and also of distinctions between different types of space. For example, in most pre-20th-century townhouses or villas a direct opening between a 'public' dining

This 17th century panelled and decorated wall at category A listed Argyll's Lodging, Stirling is highly significant due to its age, rarity and craft value which inhibits the removal of fabric to create a wider opening. Its arrangement provides evidence of the transition in social history from the open communal space of a large hall to the more fashionable private domestic use of rooms as seen on the Continent.

or drawing room and a 'private' parlour would be uncharacteristic of the traditional arrangement. A new opening in such a location should be carefully designed to minimise disruption to the appearance and character of the spaces being linked. Solid doors are likely to best retain the sense of enclosure in these cases, rather than glazed doors or openings without doors.

In some instances, the quality of the decorative scheme or importance of the plan form and layout of the spaces may inhibit removal of building fabric to create an opening.

## Historic materials

Historic materials make an important contribution to the character of a building's interior and should be retained where possible. Removal of lath-and-plaster walls, original floors and joinery, decorative plaster, or ironwork, is almost always damaging to the interest of the interior and is often unnecessary. Even where not in use, features such as doors, fireplaces or machinery, where practicable, should be left in-situ.



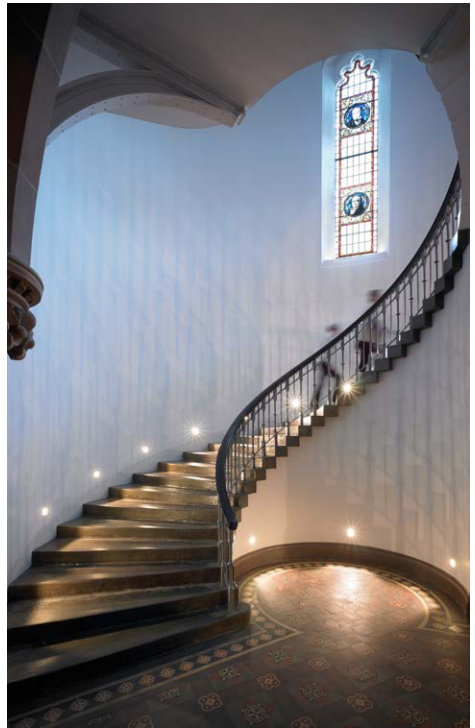
## Fabric upgrades for energy efficiency

The Climate Change (Scotland) Act 2009 commits Scotland to some of the most ambitious carbon reduction targets in the world. There are a number of practical solutions to improve energy efficiency to the interior of traditional and historic buildings whilst retaining the historic character and minimising impacts. A key aim should be to recognise that traditional buildings generally require vapour permeable and 'breathable' solutions rather than standard energy efficiency products.

Historic Environment Scotland has carried out a series of trials and pilot projects in which energy-saving measures were trialled at a variety of traditional properties throughout Scotland, including detached rural cottages, tenement flats, townhouses and public buildings dating from the 18th, 19th and 20th centuries. The results of these projects and the lessons drawn from them are published as a series of Refurbishment Case studies available on the [Historic Environment Scotland website](#).

## New design

Alterations to historic interiors should be considered in the context of the type and quality of the existing interior and plan form. Interventions should at all times respect and complement the interest and significance of the historic interior. A Heritage Statement, and if appropriate a Design Statement, may help assess and inform the appropriateness of any proposed changes.



This elegant swept stair at category A listed McManus Gallery and Museum, Dundee, has been invigorated by the subtle addition of contemporary lighting. The encaustic tiled floor and stained glass window further reinforces the decorative Gothic nature of this impressive stair hall. © [www.andrewleephotographer.com](http://www.andrewleephotographer.com)

## Structural works

In undertaking structural works, it is often best to repair the existing structure rather than replace it. Where this is impractical it may be possible to incorporate modern structural components, but care should always be taken to avoid harming the structural integrity of the building and its fabric, or damaging decorative work of quality.

The loss of a building's interior through the removal of interior walls and floor plates while retaining the outer faces of





Historic ceramic tiles often greatly contribute to the appearance and character of an interior space. Due to their durable nature they were often used in locations where cleanliness and hygiene were highly valued or in areas such as communal stairs, as in this example in an unlisted building in Sandringham Terrace, Greenock.  
©. Dr Peter Robinson Licensor [www.scran.ac.uk](http://www.scran.ac.uk)

the building, known as façade retention, will almost always harm the character of a historic building and should not normally be considered. If the interior of a property has to be completely rebuilt because of structural weakness, careful consideration needs to be given to how the new internal arrangement will affect the surviving character of the building.

### Decorative schemes

High-quality decorative schemes should be retained in-situ where possible. If the scheme is largely intact, it may be possible to undertake discreet repairs without damaging either the historic fabric or the authenticity of the scheme as a whole. If there is significant damage, or the scheme is incomplete, it may be better to protect the historic fabric and add a new layer of decoration. Where consent is required, evidence should be provided for the reinstatement of previous schemes of decoration in high-quality internal spaces.

## Reversibility

Where alterations are essential, it is often possible to undertake works that allow the future reinstatement of original features or finishes. Measures to consider include storage of removed fixtures on site, protection and concealment of items such as panelling, tiling or fireplaces in-situ, and construction of new elements around existing features (for instance, leaving plasterwork in place and scribing new partitions around existing cornice profiles).

## Fire and security measures

With careful attention to detail, fire and security protection measures can usually be incorporated with minimal visible or physical disruption to historic interiors. However, care must be taken to ensure that unnecessary harm is not caused to the character of the interior by unnecessarily exposed equipment or wiring/pipework, fire retardant measures such as additional screens and doors, and in the upgrading of existing doors and historic surfaces (e.g. intumescent paint or varnish). Further advice on fire safety management can be found in our [Managing Change guidance note](#) on the subject.

## Construction works and vacant buildings

Historic interiors and collections should be protected from damage during construction works, whether or not the building is occupied. Particular care should be taken to protect fixtures that are vulnerable to theft, such as chimneypieces, when a building is vacant. Measures can include physical protection by covering, security surveillance, or in some cases temporary removal of valuable items to agreed secure locations. This should form part of a consent process.

## Fixtures

Where fixtures contribute to the character of a building, these should be retained. In some cases, such as agricultural, industrial or ecclesiastical buildings, internal fixtures may include large pieces of machinery or built-in furniture that contribute to the interest and understanding of the building. If retention of such fixtures makes reuse of the building impractical, moving or consolidating the items within the building, or retaining exemplars of multiple units, should be considered. If removal of fixtures from the building is appropriate, rare or unusual items may be of interest to museums.

## 4. RECORDING

Where alterations are proposed to important decorative schemes or layouts, photographic or other recording of the interior in its unaltered state may be required as a condition of listed building consent. In some cases evidence of early decorative schemes comes to light in the course of works. Evidence of earlier schemes, such as fragments of wallpaper, can provide an interesting insight into the history of the building and its occupants. *Historic Environment Scotland* may record buildings, structures and sites prior to significant alteration or conversion, and in emergencies where they face imminent risks such as fire or collapse: [www.rcahms.gov.uk](http://www.rcahms.gov.uk)



These traditional timber numbered pews in category A listed Cromarty East Church, Highland have a decorative and craft value but also a functional use. Historic fixtures such as these, give us a very tangible connection with the past. © Iain Sarjeant/Scottish Viewpoint

### Archaeology

Archaeological resources may survive within or beneath a listed building or unlisted building in a conservation area. Planning authorities manage such archaeological issues, by using conditions or legal agreements to record or preserve in-situ. Advice on archaeological sensitivity should be obtained from the planning authority's archaeological adviser at an early stage.

## 5. CONSENTS

You may require planning permission, building warrant(s) and other permissions or consents for any proposed scheme. The granting of scheduled monument consent or listed building consent does not negate this requirement, and you should contact your planning authority for advice.

### Listed building consent

Listed building consent is required for any work to a listed building which will affect its character (see the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997). The planning authority is the main point of contact for all applications for listed building consent. They decide whether consent is required, and they can also offer advice on applications.

The planning authority will consider applications using guidance such as Historic Environment Scotland's managing change guidance notes and other national policy documents including SHEP, SPP and their own policies.

### Scheduled monument consent

Scheduled monument consent is required for any works to a monument scheduled under the Ancient Monuments and Archaeological Areas Act 1979. Scheduled monument consent is determined by Historic Environment Scotland. We offer a free pre-application discussion and checking service for scheduled monument consent applications. You can find out more about this on [our website](#).

## 6. SEARCHING FOR LISTED BUILDINGS AND OTHER DESIGNATIONS

You can search for listed buildings, scheduled monuments, battlefields, gardens and designed landscapes on [Historic Environment Scotland's website](#): (please read the guidelines on the search page). If you are not sure whether a particular building or feature is designated, you can also email or telephone us for help.

For a map-based search and wider environmental information, including conservation area boundaries, see the [Scotland's Environment website](#). You can also ask your local authority to tell you whether the building or feature in which you are interested is listed, and what is covered by the listing.



## 7. FURTHER INFORMATION AND ADVICE

Historic Environment Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of its roles is to provide advice about managing change in the historic environment.

### Legislation and policy

[Building \(Scotland\) Act 2003](#)

[Planning \(Listed Buildings and Conservation Areas\) \(Scotland\) Act 1997](#)

[Ancient Monuments and Archaeological Areas Act 1979](#)

[Scottish Planning Policy \(2014\)](#)

[Scottish Historic Environment Policy \(2011\)](#)

### Other selected Historic Environment Scotland publications and links

All publications are available at Historic Environment Scotland's [Technical Conservation website](#).

[Inform Guide: Improving Energy Efficiency in Traditional Buildings \(2008\)](#)

[Inform Guide: Fire Safety \(2005\)](#)

[Inform Guide: Fireplaces \(2008\)](#)

[Inform Guide: Ventilation in Traditional Houses \(2008\)](#)



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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

## Micro-renewables







Above: A small scale wind turbine in a domestic setting in Shetland. The small scale of the turbine allows it to fit unobtrusively into the surrounding landscape.  
© Pete Bevington/[www.shetnews.co.uk](http://www.shetnews.co.uk)

Cover image: Micro-renewables have been incorporated sensitively at category A listed Morgan Academy, Dundee. An example of photovoltaic panels located discreetly on hidden parts of the roof. The panels power a ground and air-source heat system.

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## INTRODUCTION

This note sets out the principles that apply to the use of micro-renewable technologies in historic buildings and sites. More detailed guidance and sources of information can be found in Historic Environment Scotland's Short Guide *Micro-renewables in the Historic Environment (2014)*:

The use of renewable energy technology in the historic environment is supported where the character of the historic building or place can be protected through careful siting and design. These guidance notes do not recommend one type or brand of micro-renewable technology over another: the circumstances of each site need individual assessment.

## KEY ISSUES

1. Before considering micro-renewables, the energy efficiency of the building should be addressed through building maintenance, equipment upgrades and improvements to the fabric of the building.
2. Listed building consent is required for any works affecting the character of a listed building, and planning permission may be required in a conservation area. Prior to undertaking works you should ask your local planning authority if any consents are required. Scheduled monument consent is required for works to scheduled monuments.
3. Micro-renewable installations should be planned carefully to minimise intervention affecting historic character while balancing the potential of available renewable energy sources.
4. Many historic buildings or sites lend themselves well to some form of micro-renewable energy generation. Different types of micro-renewable technology suit different locations, and sometimes more than one type can be used in combination.
5. Community energy schemes that allow a renewable energy system to be used by a number of buildings or a local community can be highly successful.

# 1. WHAT ARE ‘MICRO-RENEWABLES’?

In this context, ‘renewables’ are replenishable zero- or low-carbon energy technologies, in contrast to fossil fuels, which are finite energy sources. Renewable energy sources include: solar, wind, hydro, thermal (ground, water, air), biomass and combined heat and power.

‘Micro-renewables’ are small-scale non-commercial renewables commonly using systems of up to 50kW in power.

Blackhouses at Gearrannan, Isle of Lewis, refurbished for self-catering holiday and hostel accommodation. Three ground-source pumps totalling 51kW output were installed at one central location to service seven cottages. The effect on the character of the buildings is minimal. © Crown Copyright Historic Environment Scotland. Licensor [canmore.org.uk](http://canmore.org.uk)





## 2. UNDERSTANDING THE SIGNIFICANCE OF HISTORIC BUILDINGS

Many historic buildings or places are suited to some form of micro-renewable energy generation. For buildings, the key is to establish at the outset the specific significance of the building, as well as the relative significance of its component parts. The renewables system should be carefully chosen to respect the building's historic character and significance.

The character and significance of a historic building can include factors such as original purpose, style, elevations, profile, materials and detailing, and where appropriate can be evaluated by a conservation statement or plan. A conservation statement identifies the cultural and historic significance of a property, while a conservation plan also includes a strategy for the management and conservation of the property. The size and complexity of the building or site, along with the level of intervention proposed, will help determine whether a conservation statement or plan is required before work is undertaken. Each approach aims to identify the more significant elements or spaces, where intervention demands greatest sensitivity. More information is available in Historic Environment Scotland's *A Guide to the Preparation of Conservation Plans*:

## 3. REDUCING ENERGY DEMAND

Energy-saving measures and improvements to the building fabric are generally the most cost-effective means of reducing energy loss and lowering the carbon footprint. These should therefore be addressed before micro-renewable installations are planned. Improved insulation, draught prevention and upgrading existing heating and lighting systems can retain a building's character and ensure that traditional buildings are comfortable, functional structures that contribute positively to the environment for many years to come.

Guidance on fabric improvements to traditional buildings to increase thermal comfort and energy efficiency are provided in Historic Environment Scotland's conservation publications, including the Short Guide *Fabric Improvements for Energy Efficiency in Traditional Buildings*:

A full list of references is provided at the end of this document.



Sheep's wool insulation installed in a loft space which will help to reduce energy demand and improve thermal comfort.

## 4. IMPACT ON THE HISTORIC ENVIRONMENT

Renewable energy systems will often have some visual or physical impact on the building or site they serve. It is important to minimise this impact to maintain the character and significance of the historic asset, whether it is a building, archaeological site, garden or designed landscape.

When renewable systems subsequently become obsolete, it should be possible to remove them without causing harm to the building or site, or exposing unnecessary damage caused by installation.

It is sometimes difficult to balance the priorities of maximising energy efficiency and protecting a historic building or site's appearance and integrity. This means that each case has to be assessed individually on its own merits.

The following should be considered when thinking about installing any micro-renewable system:

- Where possible, installations on a building should avoid its main and visible elevations. For instance, it may be possible to place installations on secondary parts of the building, adjacent outbuildings or on the ground nearby.
- Renewables may have a visual impact beyond that of a single building or site; entire streetscapes or landscapes may be affected. In such cases the setting of a site should be carefully assessed.

Consideration of a communal system may avoid unnecessary cumulative effects of multiple single installations.

- Physical impacts include those affecting structural, archaeological, fabric and environmental aspects of the site. During installation, it may be necessary to alter or remove historic building fabric, which can include attaching frames or fixtures to roofs, passing pipes and wires over facades and through the building interiors, and integrating pumps, boilers and storage tanks into existing conventional systems. Any intervention to historic fabric should be minimised and undertaken only after careful analysis and design of the system.
- Installation of renewable systems can damage or destroy archaeological deposits. Ground-breaking works for elements such as pipes and foundations need to be carefully planned to avoid disturbing known archaeological deposits and monitored to ensure unknown archaeology is not being damaged during installation.
- Issues such as vibrations, emissions and noise during the system's use also have the potential to disturb or impact on the building or site.
- It may be necessary to devise access to the systems for fuel delivery (biomass systems), repair and maintenance.

- The installation and use of a micro-renewable system or energy efficiency measures may affect the fabric of a historic building in terms of airtightness, breathability, ventilation and condensation. Historic buildings were often constructed of materials that require a degree of ventilation and breathability to perform to their best ability. This should be taken into account when identifying the most appropriate energy solutions.

Dod Mill, a category B listed former corn mill in the Scottish Borders, where a waterwheel was re-introduced to power a pump for a ground-source heat system. The historic mill pond, cauld (weir), lade and wooden launder (trough) were all re-used to drive the new wheel.'



## 5. TYPES OF RENEWABLE ENERGY SOURCES

The renewable system(s) chosen should be the most suitable for the historic site while also improving energy efficiency and delivering carbon and cost savings.

Two or more different energy sources or technologies can operate together to maximise energy use: for example, solar photovoltaic panels might power a heat pump; or conventional systems might be used in parallel where that can improve energy efficiency. Each micro-renewable technology has specific site requirements, and not all equipment is suitable in every case.

### Solar power

Solar power systems require solar collectors or panels. For maximum efficiency, they need to face south, in an unshaded area.

Solar collectors can be installed on pitched or flat roofs, or may be integrated into the roof so that they are flush with its surface. Collectors are also available as tiles, which can mimic slate and be integrated within the roof. For the integrity of the building, it is usually desirable to mount panels over existing slates, rather than replace historic fabric with look-alike materials. However, look-alike materials may be considered when a roof is in need of replacement and the historic building fabric will not be inappropriately altered. Removal of solar collectors may also require minor roof works to replace any slates that were removed when the panels were installed.

Installation of solar panels on the principal elevation of a historic building should be avoided because of the detrimental visual impact. Therefore, if historic buildings face south, their main roof slopes may be inappropriate as locations for solar panels. Alternative solutions should be explored, such as installation on secondary roof slopes, on locations hidden from main views, or on surrounding areas such as sheds, gardens or fields. Panels have been successfully installed behind parapet walls or on the south-facing inside rise of M-shaped roofs.

Solar systems installed on roofs can be heavy, and an appropriate survey should be carried out to determine the structural impact and safety of such systems. It is important to consider archaeological resources if ground disturbance is necessary to connect cables to free-standing collectors.

The Energy Savings Trust has created a [solar energy calculator](#) to help calculate the potential energy that solar panels will generate in a specific location:

### Wind power

Wind turbines are either building-mounted or free-standing. Free-standing mast-mounted turbines require fewer works to a historic building and can generate power from a nearby location. An understanding of the setting of the historic building, streetscape or landscape is paramount in deciding on the appropriate positioning of a turbine. For advice on this, see the [setting guidance](#) in this Managing Change series.





Above and below: Part of a block of seven Category B listed early 19th century tenements in use by a housing association at Lauriston Place in Edinburgh. Part of a block of seven Category B listed early 19th century tenements in use by a housing association at Lauriston Place in Edinburgh. As part of the Renewable Heritage Project, led by Changeworks in partnership with Lister Housing

Co-operative and Edinburgh World Heritage, solar water-heating panels have been fitted to the inner south-facing slopes of the valley roofs to provide 50% of the hot water requirements of all the occupants. The new panels are not visible from the ground, or in views from higher vantage points. Energy conservation measures, such as secondary glazing, are also in place.



Where a building's structure permits the added weight and vibration, turbines can be mounted discretely, for instance on flat roofs or gables. However, generally, these turbines are unlikely to perform well as such locations tend to receive weak and irregular winds. The visual impact on the building also needs to be appraised: turbines can break the building profile, and the movement of the blades can also have an adverse visual impact.

## Hydropower

Hydro systems use the kinetic energy of flowing water to turn a turbine, producing electricity for a site or for export to the National Grid. In most systems, water is piped to a turbine which drives a generator to produce electricity. Such systems can be very successful, robust and long lasting. However, they often require considerable construction works, and it is important to minimise impact on the historic environment by careful selection of sites, equipment, design and routing of pipes and cables.

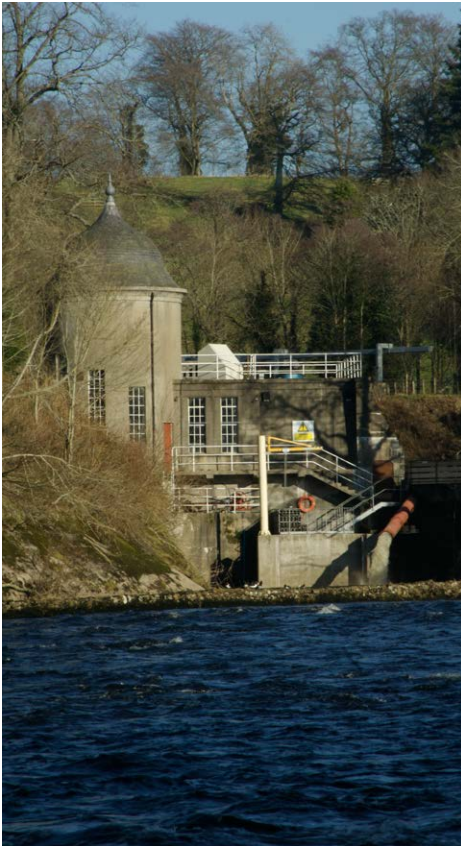
There has been increasing interest in re-using redundant mill lades and historic hydro schemes, including historic weirs, turbines and waterwheels. Recording and retention of any historic mechanism is recommended. Further information on hydro schemes can be found at [here](#).

Before considering the re-use of a historic cauld/weir or dam it may be necessary to consult with the Scottish Environment Protection Agency (SEPA) regarding potential requirements for consent relating to fish migration and other environmental issues. Further information can be found on [SEPA's website](#).

New hydro systems should be designed with regard to physical impact on historic buildings, archaeology and setting.



Category C listed Westray Parish Church in Orkney became self-sufficient in energy with a 6kW wind turbine, ground-source heat pump and back-up diesel generator. The turbine is far enough (80m) from the building to avoid turbulence. © Ease Archaeology



The category B listed 1921 turbine house at Stanley Mills, Perth & Kinross, refurbished as part of a new hydro-electricity scheme to supply power to the grid. At 840kW the scheme is significantly larger than the standard micro-renewable development, but it demonstrates the potential for re-use of an existing hydro site.

## Heat pumps

Heat pump systems provide energy by moving heat from one place to another. Heat at lower temperatures is collected from the air, ground or water and is raised using compression techniques to provide a more usable, constant heat for a building. These systems are often best used with underfloor heating. Their efficiency can be severely reduced as temperatures drop, so there may still be some reliance on traditional systems for heat.

Ground-source heat pumps (GSHPs) tend to achieve higher efficiency but require long lengths or coils of pipe in either a trench or vertical borehole. This means careful attention has to be given to potential damage to archaeology. Water-source heat pumps are less common but can be as efficient as ground-source heat pumps, provided the water source does not freeze. Air-source heat pumps are also available; these require internal and external units and therefore need to be located as unobtrusively as possible.

All heat pump systems require careful design to minimise impacts to the historic environment. Pipework and pump equipment (often in one or two units, some indoors, some outdoors) need to be carefully located to avoid both physical and visual impacts. Underfloor heating often requires setting heating coils in a concrete floor slab, which can damage historic floors or archaeology.

Because of the damage that trenches and boreholes can cause, where archaeological sites are known to be present or likely, a different form of renewable energy system may be more appropriate, or an archaeological watching brief may be necessary to monitor the works. The local authority archaeology service will be able to provide advice.



## Biomass

Small-scale biomass developments are based predominantly on wood fuel products. These products are carbon neutral because they absorb carbon when alive before releasing it when burned, and trees can of course be re-planted. The system requires a boiler or stove, storage, pipework, chimneys/flues, perhaps a boiler house

and other variables such as delivery access. The full system for a biomass development will require careful planning and it may be possible to integrate it into existing buildings. Particular care should be given to the location of chimneys/flues and the fuel storage facility to ensure the system is unobtrusive and avoids visual impacts.



Fuel store for a biomass boiler serving category B listed Kincardine Castle, Aberdeenshire. This small storage facility is refilled from a larger shed located further away. This storage shed has been built discreetly behind a timber dog kennel.



## 6. RENEWABLES AT A COMMUNITY SCALE

Community energy schemes allow a renewable energy system to be used by a number of buildings or a local community and can be highly successful and cost-effective. District energy makes use of a number of energy sources to provide heating, hot water and electricity to many users. Schemes can use combined heat and power (CHP), biomass, energy from waste, heat pumps, wind turbines and hydropower, as well as fossil fuels.

Benefits of district schemes include increased efficiency through diversification of peak load times and economies of scale, and reduced susceptibility to future changes in energy availability and cost. In addition, district energy may be less intrusive to historic buildings or sites as the amount of on-site equipment is typically less than for a system on an individual site.

For further information visit the [Community Energy Scotland website](#) or the [UK District Energy Association website](#).

## 7. CUMULATIVE EFFECTS

Local authorities should consider the potential incremental and cumulative effects of micro-renewable development on the historic environment. They may consider it appropriate to produce specific policies or guidance for significant groups of historic buildings or places.

The district energy combined heat and power (CHP) in Falkirk produces 3,093MWh of electricity, which is distributed to the National Grid. The re-captured heat is enough to heat six high-rise towers and the category A listed Callendar House.



## 8. ARCHAEOLOGY

Archaeological resources may survive within or beneath a historic building or place. Planning authorities should seek to manage archaeological issues such as recording or preservation in situ.



Installation of a ground-source heat pump (GSHP) at Assynt Church, Inchnadamph (Category B-listed). The coils for the system were installed in trenches behind the church. © LDN Architects

## 9. CONSENTS

You may require planning permission, building warrant(s) and other permissions or consents for any proposed scheme. The granting of scheduled monument consent or listed building consent does not negate this requirement, and you should contact your planning authority for advice.

### Listed building consent

Listed building consent is required for any work to a listed building which will affect its character (see the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997). The planning authority is the main point of contact for all applications for listed building consent. They decide whether consent is required, and they can also offer advice on applications.

The planning authority will consider applications using guidance such as Historic Environment Scotland's managing change guidance notes and other national policy documents including SHEP, SPP and their own policies.

### Scheduled monument consent

Scheduled monument consent is required for any works to a monument scheduled under the Ancient Monuments and Archaeological Areas Act 1979. Scheduled monument consent is determined by Historic Environment Scotland. We offer a free pre-application discussion and checking service for scheduled monument consent applications. You can find out more about this on our [website](#).

## 10. FURTHER INFORMATION AND ADVICE

Historic Environment Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of its roles is to provide advice about managing change in the historic environment.

### Legislation and policy

[Building \(Scotland\) Act 2003](#)

[Planning \(Listed Buildings and Conservation Areas\) \(Scotland\) Act 1997](#)

[Ancient Monuments and Archaeological Areas Act 1979](#)

[Scottish Planning Policy \(2014\)](#)

[Scottish Historic Environment Policy \(2011\)](#)

### Other selected Historic Environment Scotland publications and links

All publications are available at Historic Environment Scotland's [Technical Conservation website](#):

[Inform Guide: Energy Efficiency in Traditional Homes \(2011\)](#)

[Maintaining Your Home: A Short Guide for Homeowners \(2007\)](#)

[Short Guide – Fabric Improvements for Energy Efficiency in Traditional Buildings \(2012\)](#)

[Short Guide – Micro-renewables in the Historic Environment \(2014\)](#)

[The Energy House \(computer based interactive tool, 2012\)](#)

[Managing Change in the Historic Environment Guidance Notes](#)

### Other selected publications and links

[CADW, Renewable Energy and your Historic Building – Installing Micro-Generation Systems: A Guide to Best Practice](#)

[Changeworks, Renewable Heritage](#)

[Historic England, Saving Energy and Generating Energy](#)

[National Trust, Green Energy Building Design Guides guides](#)

### Selected contacts

[Carbon Trust: Tools, Guides and Reports](#)

[Centre for Alternative Technology](#)

[Community Energy Scotland](#)

[Energy Saving Trust](#)

[EFFESUS, Energy Efficiency for EU Historic District's Sustainability](#)

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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT WINDOWS



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

January 2018

Cover image:  
© Nick Haynes

Cover image: Signet Library, Parliament Square,  
Edinburgh. A round-headed sash and case window  
with astragals, or glazing bars.

Below: Gourock Rope Works, Port Glasgow.  
Conversion of a former industrial building with the  
addition of new windows suitable for its change to  
residential use.



# MANAGING CHANGE IS A SERIES OF GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. ALONG WITH HISTORIC ENVIRONMENT SCOTLAND'S POLICY STATEMENT (JUNE 2016), THEY SUPPORT THE SCOTTISH GOVERNMENT POLICIES SET OUT IN SCOTTISH PLANNING POLICY (2014)

The aim of the series is to identify the main issues that can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to provide advice to local authorities when developing their planning policies, and in the determination of applications relating to the historic environment.

## KEY ISSUES

1. The windows of a historic building form an important element in defining its special interest and character.
2. The contribution windows make to the character of a historic building must be understood before considering alteration.
3. The size, shape, design and proportions of a window, the reflective sparkle and irregularities of old glass, the pattern of design, the materials and details of construction, the method of opening, the finish, and associated fixtures, typically contribute to the character of a historic window.
4. Maintenance and appropriate repair is the preferred means of safeguarding the character of a historic window.
5. Improvements in energy efficiency of existing windows can be achieved by draught-proofing, internal secondary glazing, and use of shutters and lined curtains.
6. Some types of double-glazing can be incorporated within existing window joinery and may be acceptable where no historic glass remains.
7. Where a window is of limited interest or beyond repair, its replacement should be permitted. New double-glazed windows may be acceptable, if they can closely match the original window design, detail and materials.
8. Local planning authorities give advice on the requirement for listed building consent, planning and other permissions, and will often have their own detailed guidance on windows. Listed building consent is required for any works affecting the special interest or character of a listed building and planning permission may be required for window replacement within a conservation area.

## INTRODUCTION AND PURPOSE OF DOCUMENT

Historic Environment Scotland is charged with ensuring our historic environment provides a strong foundation in building a successful future for Scotland. One of its roles is to provide advice about managing change in the historic environment.

This note sets out the principles that apply to altering the windows of historic buildings. It has been produced to guide local authorities when developing their planning policies and in the determination of applications relating to the historic environment.

Historic Environment Scotland will be consulted on listed building consent cases for works to windows in A and B listed buildings, and expect this guidance to inform decision making.

Local authorities alone determine listed building consent applications for windows in Category C listed buildings and planning applications, where applicable, for windows in unlisted buildings in conservation areas. Whilst this guidance is best practice for historic buildings generally, local authorities will often have specific window guidance for listed and unlisted buildings in conservation areas, reflecting local character and particular circumstances, and thus, other approaches may be appropriate.

In this guidance note the term 'historic window' is used for both original and significant historic windows.

Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls take precedence. Further advice is available from Historic Environment Scotland's website: [www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/scheduled-monuments](http://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/scheduled-monuments)

## 1. WHY ARE HISTORIC WINDOWS IMPORTANT ?

Windows make a substantial contribution to the character, authenticity and physical integrity of most historic buildings and also to the character and interest of historic streets and places.

They are an important element of a building's design. The size, shape and positioning of the openings are significant, as are the form and design of the framing, astragals and glazing. Their style, detailing and materials help us to understand the date when a building was constructed or altered, its function, and advances in related technology.

Windows can be a product of many factors, including the status of the building, architectural fashions, technological changes, local customs and even individual designers.

In simple vernacular or plainer buildings a considerable amount of the character and visual prominence of a building can derive from the windows.

## 2. IDENTIFYING THE INTEREST OF HISTORIC WINDOWS

The significance of a historic window is derived from a number of factors including its form or shape, the characteristics of historic glass, the materials and details of construction, the method and pattern of opening, associated fixtures, and sometimes even the paint colour.

This guidance is focused on the most common type of traditional historic window, the double-hung vertically-sliding timber sash and case window (the sash window). Other window types will be addressed later in the document.

### FORM AND DESIGN

There are many shapes and sizes of historic window, from simple rectangular openings to arched or elaborately-traceried windows. Whilst some windows are sized and located for purely functional purposes, in most cases, windows are carefully provided as part of a broader design for a building or group of buildings.

Window proportions and spacing frequently relate to other elements of the building, such as the overall dimensions of an elevation or other features (e.g. doorways). Windows are important components of the hierarchy of an architectural design or interior, perhaps expressing different parts of a building and principal rooms within, through differences in size, positioning and design.

Six over six pane timber sash and case windows, Edinburgh. This style of window was popular from the eighteenth to the mid nineteenth century. This one image shows the varied reflections provided by different kinds of crown, cylinder and plate glass.





## HISTORIC GLASS

The different production methods for various types of historic glass resulted in a wide range of thicknesses and tints, whilst irregularities in the process often provide an attractive reflective sparkle, refractive variety and distinctive appearance to each window.

Two forms of early glass predominated until the later nineteenth century. Crown glass was made by hand-spinning molten glass into a thin circular disc which was then cut into individual panes. From around 1700 onwards, cylinder or broad sheet glass was made by forming cylinders of molten glass that were then cut and flattened into thick panes. Both these methods were expensive, had a restricted pane size, and produced distortions and bubbles in the glazing that add character, and identify the production process. Surviving examples of this hand-made glass should be retained.

Early plate glass was quite thick and expensive, made in a similar method to cylinder glass or by casting molten glass on a table and then grinding and polishing it flat. The cylinder sheet glazing process was greatly improved in the 1830s which is also when Patent plate glass was invented, allowing thinner low-tax glass to be produced, with later mechanical polishing further reducing costs. The production methods of improved cylinder and plate glass retain varying levels of imperfections and irregularities in the glass that can add character to a window.

## MODERN GLASS

Drawn flat sheet and float glass are both C20th mechanised processes, the latter producing glass with few imperfections. More recently, glazing technology has produced many different types of glazing, the major change being the advent of double-glazing or Insulated Glass Units (IGUs) with two panes of glass separated by either a vacuum cavity, or a cavity filled with air or an inert gas, to reduce energy loss through the glazing. Standard double glazing has two panes, usually of 4-6mm glass, with a cavity of around 13-20mm. Slim, thin or narrow-profile/section double-glazing has cavities of between 3mm and 6mm and a narrower edge strip. Vacuum glass has a 'cavity' between the panes of only 0.2mm. The latter two are sometimes used to replace historic glass within existing or new frames. Both double glazing and specialist single glazing can be fitted with low-emissivity coatings which can further improve their thermal efficiency.

## GLAZING PATTERNS

The vertically sliding sash and case window was introduced to Scotland in the early 1670s. After some variation it commonly comprised two equally-sized glazed sashes that slide vertically, on counterbalanced lead or iron weights, in a sash case or box set in a rebate in the wall for weather protection. Windows were made of softwood, usually well-seasoned pine, often imported.

Early sash windows were sometimes fixed or held open by pegs rather than counterbalanced weights. Their sashes contained small thick panes, often square, held by thick glazing bars or 'astragals'. As the eighteenth century progressed an arrangement of two equally-sized sashes containing six 'portrait' format panes each became the standard. Generally, over time, astragal sections and glass thicknesses reduced as window openings increased in size and glazing technology improved. The standard six-over-six 'Georgian' pattern was widely used until at least the mid-nineteenth century, with occasional use of 'lying-panes' ('landscape' format) and margin panes, but the advent of improved cylinder and patent plate glass, and the removal of taxes, allowed larger panes of glass and fewer astragals. There was a gradual transition to larger panes with four-over-four and two-over-two panes frequently used, but by the later nineteenth century the one-over-one pattern was common. Horns, added to the meeting rails of sash windows to address these heavier panes of glass, are not very common in Scotland and often do not appear until late in the C19th, if at all.

When larger pane sizes first became available, often the astragals in existing sashes would be removed and retrofitted with single panes of glass. Again, due to expense, frequently only the front windows of properties would be re-glazed in this fashion. Likewise, in new buildings, sometimes the rear elevations continued

to be designed with cheaper smaller panes.

Either side of 1900 saw experimentation with different sash sizes, often a lower large-paned sash with smaller multi-paned sash above, or sometimes decorative glass. The popular 'Queen Anne' style saw the reintroduction of smaller panes, and sometimes exposed sash cases, whilst multi-paned sashes were popular in inter-war social and private housing developments.

## OTHER WINDOW TYPES

Besides the sash and case window, there were other types of window used in Scotland, including timber and metal casements, often with leaded lights, associated with the 'cottage orne' style and with Arts & Crafts style housing.

Although timber windows continued to predominate as a framing material until the Second World War, the early C20th saw the introduction of steel casement windows, popularised by the Crittall Company. They allowed schools and industrial buildings to have large expanses of glazing and curtain walling, and also facilitated 'picture windows' in housing. The use of steel windows was largely superseded in the post-war period by aluminium, and later still, uPVC.

## METHOD OF OPENING

The way in which a window opens can contribute significantly to the authenticity and appearance of a historic building. All traditional 'double hung' sash and case windows open by sliding the sashes up and down in the same plane: in the open position they never project outwards or inwards from the building. Other common forms of opening method are casements, which are hinged at the side and open outwards (or more rarely inwards), and hoppers, which are hinged at the bottom and usually open on a track or restrictor. Some C20th metal-framed windows use a vertical or horizontal pivot mechanism.

Associated fixtures such as traditional timber shutters, where they survive, contribute to the interest and character of a window



## FINISH

Like most softwoods, window frames were traditionally painted, and this is the preferred finish. It is sometimes possible to sample underlying layers to establish the original paint colours. Whilst shades of white are now ubiquitous, many traditional colours were much darker, with green, brown and black often used. Lead-based paint is now prohibited, but more recently natural paint systems have offered an alternative to synthetic paint.

## ASSOCIATED FIXTURES

A wide range of fixtures are often associated with historic windows, including sash cases, cords, weights, sash lifts, catches, shutters (and their ironmongery), architraves and blinds. Surviving original ironmongery should be retained and reused. Many sashes in Scotland incorporate 'simplex' hinges that allow them to be opened inwards for cleaning.

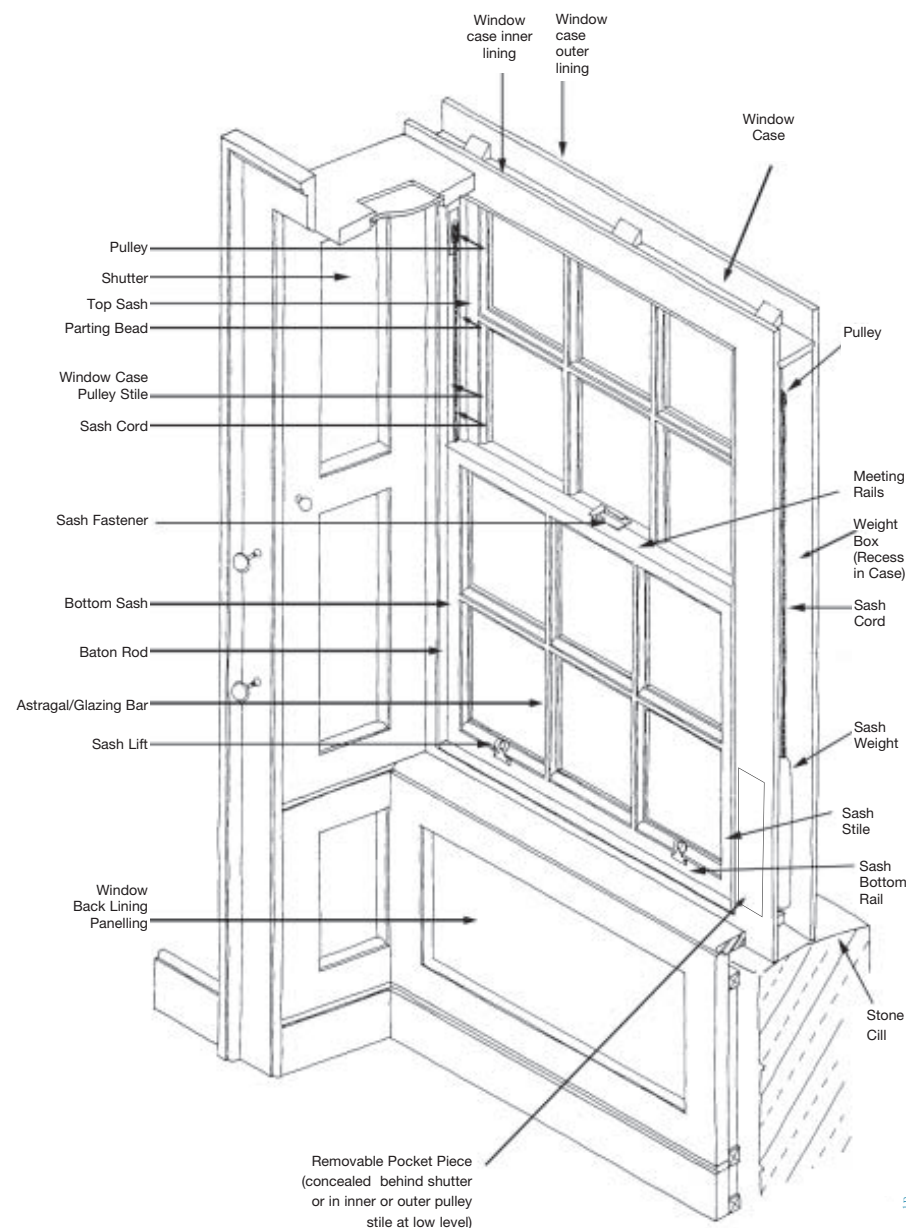


Illustration of a typical sash and case window

### 3. PRINCIPLES FOR REPAIR AND ALTERATIONS

#### CHARACTER AND INTEREST OF THE BUILDING

Repairs and alterations to a historic building should protect its character and special interest. The contribution windows make to this character must therefore be understood before proceeding. In assessing the character, it is essential to determine whether the windows are original to the building or, if later, whether they are of historic significance in their own right: e.g., part of a major or important scheme of overall works or decoration to the building. Evidence from adjacent or similar buildings, especially planned set-pieces or terraces, will be important. Such an assessment will inform any subsequent strategy for repair or replacement.

Repair of a sash and case window showing replacement of some of the component parts, such as the cill.

Image:© Derek Thompson



#### REPAIR

Where windows are of historic interest, repair of their components is preferable to replacement. This approach not only retains historically-important fabric and character, but is sustainable. Historic timber windows often used high-quality close-grained softwood, not easily available today, and with maintenance, have frequently lasted hundreds of years.

In some cases there will be cosmetic damage to windows, with sashes painted shut, or peeling paint, often only on the more exposed faces of the building. There may also be individually decayed elements, such as rotten cills, which can normally be repaired or replaced. However, there will be situations when a window is in such poor condition, damaged or rotten to an extent that it is not possible or practicable to repair it. A specialist joiner may be able to advise on condition, and more detailed advice on the repair of timber windows can be found in our Inform and Short Guides (details at the end of this leaflet).

Steel windows can also suffer from rust and distortion and, although repair is possible and preferable, sometimes this may not be practicable.

#### ALTERATION

An assessment of character and special interest will be important when changes to the window's design are envisaged. If clear evidence for an earlier pattern exists, reinstatement of that pattern should be acceptable, unless the later windows are of interest in their own right; for example, if they relate to significant alterations and additions that are part of the building's special interest.

In other cases the windows may be modern replacements, sometimes inexact copies of the original examples, or using inappropriate sections or materials. In such cases it should be acceptable to replace the windows with an aim to regain the original design intention or improve the existing situation.

#### VENTILATION

Sometimes additional controlled ventilation is required, especially in conversion works. Discreet vents inserted in the head, meeting rail or sides of the window should be used rather than adding prominent trickle vents. Further information on providing alternative methods of ventilation is available in our Short Guide to Sash and Case Windows.

#### SECURITY

Additional window security measures, such as security bolts or sash restrictors, can normally be installed discreetly without damage to the historic character of the building. Use of traditional internal shutters, or if necessary internal retractable grilles, is likely to be less disruptive to the historic appearance of a building than external shutters.

Where external measures are unavoidable, removable grilles are more acceptable than permanent fixtures (including roller shutters). Where no historic glass remains laminated, toughened glass can often be installed to increase security.

#### COLOUR

Where colour or early paint schemes can be established by analysis, their use should be acceptable, although individual changes to set-piece designs or terraces may be unwelcome. Some local authorities control the palette of window paint colours to maintain the unified design of a conservation area or groups of listed buildings in multiple ownership/occupation. In addition, some areas have developed a custom of using specific colours; e.g., black-painted frames in the West End of Glasgow and white frames in Edinburgh New Town.



### NEW WINDOW OPENINGS

Location and design are key considerations in proposals for new window openings. New openings must be carefully located to avoid disruption to the characteristics of the surrounding external and internal context. For example, subsidiary elevations with no formal symmetry, or rooms with few internal features, are likely to be more suitable for new window openings than principal elevations or rooms.

In cases where the building forms part of a larger grouping, it may be necessary to consider the wider context of the group and the potential for unsuitable precedent and cumulative effect if similar work was undertaken on every building. Where the location is appropriate in principle, the design of the new window must take account of the size, proportion, material and detailing of surrounding nearby windows.

### BLOCKING UP WINDOWS

Permanent blocking of windows by building up the opening should only occur where the window makes very little contribution to the character of the building. If the window is of any interest, evidence of the opening, such as the window surrounds, cill, lintel or relieving arch should be retained, preferably with the window kept in-situ with blocking materials set behind or with the blocking recessed to the position of the former window, creating a traditional blind

window. If the window being blocked is of no interest or detrimental to the building it can be blocked without any evidence being kept, using materials compatible with the surrounding masonry.

### CONVERTING WINDOWS TO DOORS

Subsidiary elevations are more suitable for work of this type. Wherever possible the existing width of the window should be maintained and the opening expanded downwards to ground level. Depending on the circumstances, it may be appropriate to match any external window-surround detailing at the lower level. Where windows contribute to the character of an elevation or internal space, the replacement door should be solid to cill level and glazed above to match the pattern of surrounding windows. Any internal joinery, such as shutters or panelling, should be retained and matched at the lower level of the new opening. Doors are also sometimes converted to windows. Here, if the door is an important part of the character of the building, it will be desirable to provide a glazed or part-glazed door rather than blocking up the opening to insert a window.

### BLIND WINDOWS

Original blind or dummy windows form an important part of the interest of a historic building and should not normally be opened up. Such features were originally designed to maintain the pattern and symmetry of window openings in the external elevations of a building, or

sometimes to provide a visual trick or 'trompe l'oeuil'. They are often faced in large stone slabs designed to resemble the sashes. Often fireplaces, chimneys, or other internal features prevented the

creation of working windows in some locations. Windows specifically blocked to avoid paying window taxation are rarer.



South Charlotte Street, Edinburgh. The blind openings are detailed with cills and a meeting rail to maintain the symmetry of the architectural elevation. There are chimney flues behind them within the walling.

Image:  
© Nick Haynes



## 4. UPGRADING WINDOWS

### ADDRESSING ENERGY EFFICIENCY AND HEAT LOSS

Having regard for the energy conservation of buildings in use is an important element in addressing climate change and reducing heating costs. In many cases effective and sustainable improvements to the energy efficiency of historic buildings are possible and can be achieved without damage to their character.

The use of traditional shutters at night can help reduce heat loss.



It is important to consider heat loss throughout the entire envelope of a building and, in most cases, less invasive approaches than double-glazing or window replacement may be more cost-effective in both the short and longer term. However, single-glazed windows are often the worst-thermally performing element in a building and a readily identifiable route for heat loss, especially in buildings with large window-to-wall ratios.

There are several methods of improving the energy efficiency of existing windows. Low-key and low-cost improvements include applying low-emissivity window films onto or behind the glass. At night, considerable improvements to heat loss can be obtained by lined curtains, insulated blinds, or using historic shutters, which can also be insulated. A combination of the above measures can be particularly effective.

### DRAUGHT-PROOFING

Sash windows were designed to allow some air flow into a room but not to be draughty. Draught-proofing can reduce air-leakage and the feeling of cold within a building. It is relatively simple to draught-proof a window using silicone sealant, foam-backed strips or by inserting brush strips into the baton rods and meeting rails. Removing draughts can lead to reductions in the heating levels required and can also be helpful in reducing dust and noise.

### SECONDARY GLAZING

Recent technical research (see section 6 & 7) shows internal secondary glazing can reduce heat loss by over 60% and also has the advantage of leaving the original windows untouched, a welcome approach where the window is significant, retains historic glass, or where adaptation for double-glazing would be complicated or damaging. It can also be cheaper than replacement, and can be a more permanent solution than double-glazed units, whose performance will degrade over time. Acoustically, secondary glazing can also be better at reducing noise transmission than double-glazing.

Systems vary, but normally comprise glass in thin aluminium or timber frames set on the internal window framing or staff beads, and they can sometimes be designed and fitted to still allow historic shutters to function. Secondary double-glazing is rarer, but has also been used. Care should be taken to keep frame sections minimal and match up internal meeting rails or frames with outside sashes. Painting the external frame face black can further disguise units from external view. Care is needed to allow ease of use for both opening and cleaning.

Inveraray Castle, Argyll, showing the discreet addition of secondary glazing, in this case polycarbonate sheeting on magnetic strips. The placing of the unit allows the shutters to operate freely.

Image: © Glaze & Save Ltd

Temporary or demountable secondary glazing solutions are also available, utilising clear rigid acrylic or polycarbonate sheets. These can also provide significant reductions in heat loss, and can be fitted easily (often with velcro or magnetic strips) for winter and removed and stored in summer. Another approach is to fix the sheets to individual panes. Again, these approaches can significantly reduce heat loss at a lower cost than more invasive works.

### RETROFITTING DOUBLE-GLAZING

In some cases, where no historic glass survives, it can sometimes be possible to retrofit double-glazing within existing window frames. Due to the design and construction of historic windows, it is normally only vacuum- or narrow-profile double glazing that may be able to be used. Vacuum glazing is thin enough to directly replace single glazing, but if narrow-profile glazing is used, the windows concerned will have to be robust enough to withstand any adaption or routing required to accommodate the thicker panes. Any works that either weaken the window or may lead to exacerbated decay should be avoided.



## 5. REPLACEMENT WINDOWS

### REPLACEMENT DOUBLE GLAZED WINDOWS

Where existing windows are beyond repair, or of little historic interest, it should be acceptable to replace them. This can involve replacing just the individual sashes or the sash case as well. Where a new sash case is fitted it should be set wholly within the wall's rebate, with no, or minimal, protrusion of the case's facing plate, unless exposed sash-cases are a feature of the original design. Sash cases were traditionally fixed with timber wedges and burnt sand mastic. Internal shutters and joinery should always be retained.

Generally, replacement windows should seek to match the original windows in design, form, fixing, method of opening and materials. In replacing sash windows, materials other than timber, e.g. uPVC, will rarely be acceptable. Softwood is traditionally used, now often treated to improve durability.

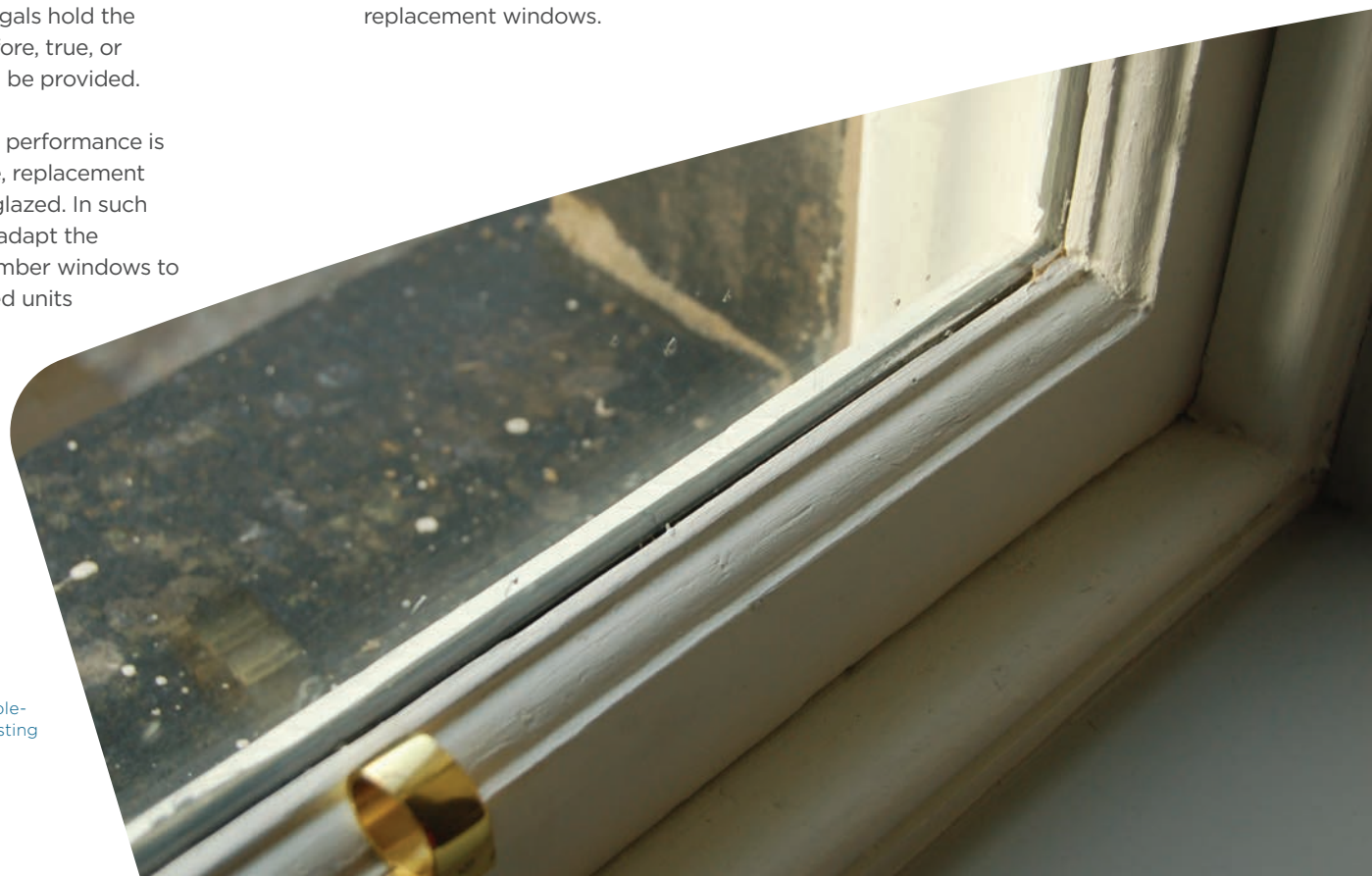
For metal windows, steel replacement double-glazed windows are available, although can be expensive for individual replacements. Aluminium may be acceptable as an alternative if original patterns and sections can be successfully replicated.

The success of a replacement window will depend on its detailed design, and on how well the new replicates the old. Features to consider in the design of new windows may include the correct placing of the case within the wall and, importantly, its method of operation with vertically sliding sashes. Sections of sash meeting rails and astragal profiles should match the original as closely as possible, and horns should only be provided if there is historical evidence for their use. In seeking the best replication of the design and construction of the window, how astragals hold the glass is important. Therefore, true, or through, astragals should be provided.

In most cases, as thermal performance is a major driver for change, replacement windows will be double-glazed. In such cases care is required to adapt the detailed design of new timber windows to incorporate double-glazed units

Narrow-profile double glazing has been specifically developed to allow more accurate replication of historic window patterns, and vacuum glass is similarly marketed. Such approaches have directly resulted in double-glazing becoming more generally acceptable in historic buildings, with consequent improvements in energy efficiency. Although some narrow-section units may not be optimised for thermal performance, they give significant improvements in heat loss from single glazing and can allow for near like-for-like replacement windows.

Standard double-glazing may occasionally be acceptable for some replacement windows, e.g. one-over-one sashes. However, the thicker astragals required by standard units, together with limitations on some manufacturer's guidance on edge-sealing of units, mean they often cannot successfully replicate historic multi-pane patterns, especially those windows with thinner astragals.



Example of narrow-profile double-glazing retrofitted within an existing sash window.

Some manufacturers have attempted to address this by using a standard double-glazed unit with applied astragals or an astragal cassette, often in conjunction with integral dividers in the cavity. Such approaches may be considered in cases where a replacement window will improve the current situation, allowing an aesthetically accurate match. Astragals sandwiched between panes alone, will be very unlikely to be acceptable.

### FITTING GLAZING

Double glazed units can be fitted with putty, or a synthetic glazing compound. Windows should be fitted according to manufacturer's instructions as linseed oil putty may damage unit seals. It may be possible to use timber fixing beads, but the beads should replicate the 45-degree section of traditional putty. Smaller details such as the colour of internal spacer bars in unit cavities can also be important; e.g., white can better replicate the glazing bar colour.

## 6. CONSENTS

Listed building consent is required for any work to a listed building that affects its special interest and planning permission may be required for replacement windows in conservation areas.

The local authority determines the need for consent/permission. With listed buildings, they may consider minor works such as draught-proofing will not require consent. Other works, such as the installation of secondary glazing, may sometimes require consent, often depending on its detailed design. More intensive works; e.g., retrofitting double glazing, will be likely to require consent, as will window replacement.

Where consent is required, an application is made to the local planning authority. This should include accurate scale drawings showing both the existing windows and the proposed works in context. It is normally helpful to provide detailed technical information and photographs. A brief description of the interest of the windows and an explanation of the impact of the alterations are always helpful in assessing change. Where an application proposes the replacement of a window or windows in poor condition, a condition survey by an appropriately-skilled tradesman is useful.

Notwithstanding the need to protect the historic environment, applicants and local planning authorities should ensure replacement windows comply with the requirements of the Building (Scotland) Regulations 2004. Some change of use applications may have implications for windows (e.g. window guards). Historic Environment Scotland's guide for Practitioners 6 – Conservation of Traditional buildings – provides further guidance on the application of the Scottish Building Standards.

### MEETING PERFORMANCE STANDARDS

If you are replacing your windows you will want assurance that the units being supplied achieve the results you seek. New glazing, in particular, Insulating Glass Units (IGUs), should be manufactured in accordance with the requirements of the Product Standard EN 1279-5, a requirement for legal compliance with the Construction Products Regulations (CPR). The industry body, the Glass and Glazing Federation (GGF) has a wealth of information for consumers and providers on its website and in its publications; <http://www.ggf.org.uk/publications>, which includes the Industry Guidance details on the Construction Product Regulations and the tests that must be complied with to meet them.



## 7. FURTHER INFORMATION AND ADVICE

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website. The following will be of particular interest;

[Looking After your Sash & Case Windows \(2003\)](#)

[Guide for Practitioners: Conservation of Timber Sash & Case Windows \(2002\)](#)

[Research Report: The Historical & Technical Development of Sash & Case Windows in Scotland \(2001\)](#)

[Inform Guide: Maintaining Sash & Case Windows \(2007\)](#)

[Inform Guide: Maintaining Traditional Plain Glass and Glazing \(2007\)](#)

[Inform Guide: Decorative Domestic Glass \(2007\)](#)

[Short Guide: Fabric Improvements for energy efficiency in traditional building \(2013\)](#)

[Technical Paper 1: Thermal Performance of Traditional Windows](#)

[Technical Paper 23: Thermal assessment of internal shutters and window film applied to traditional single glazed sash and case windows](#)

In addition we have several Refurbishment Case Studies that show the upgrading or replacement of windows and also include costs for such works.

### GRANT ASSISTANCE

In some cases grants and loans are available for energy efficiency improvements, including windows. Home Energy Scotland provide free, impartial advice. On 0808 808 2282 or [www.energysavingtrust.org.uk/scotland/grants-loans](http://www.energysavingtrust.org.uk/scotland/grants-loans)







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# Roofs



# Key Issues

- 1. The roof and associated features of a historic building, or group of historic buildings, form important elements in defining their character. Listed building consent is required for any works affecting the character of a listed building and planning permission may be required in a conservation area.**
- 2. The significance of a historic roof is derived from a number of factors including its age, functional performance, shape and pitch, profile, and the qualities of its supporting structure, covering materials and associated features.**
- 3. In planning works to a roof it is important to understand its contribution to the building's character and to protect the special interest of the building through the re-use of existing historic materials and close matching of new materials.**
- 4. Improvements in the energy conservation of historic roofs can be achieved through insulation and ventilation, without damage to the appearance of the roof.**
- 5. Planning authorities give advice on the requirement for listed building consent, conservation area consent and other permissions.**

## 1. INTRODUCTION

- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to altering the roofs of historic buildings. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K).



*The rich variety of domes, towers, steeples, gables and chimneys contributes to the character of Glasgow City Centre. © N. Haynes.*

## 2. WHY ARE HISTORIC ROOFS IMPORTANT?

- 2.1 The wide variety of historic roofs reflect variations in local climate and the availability of materials and skills at a particular period in time. The design, use of materials, construction and detailing of roofs make a substantial contribution to the character of any historic building or area. In practical terms, roofs are clearly critical to protecting the structural components and interiors of historic buildings from the weather. Collectively, roofscapes and skylines are often key features of historic cities, towns and villages.

## 3. IDENTIFYING THE INTEREST OF A HISTORIC ROOF

- 3.1 The interest of a historic roof is derived from a number of factors including its shape or form, structure, covering materials, and associated features. The roof can play an important part in the architectural design of a historic building, and craftsmanship can also contribute to its interest. Traditional roofs were usually constructed by local tradesmen using local materials and techniques. This local distinctiveness is frequently a key element of the interest of the building.
- 3.2 Even within a single building, parts of a roof can have different levels of interest: some parts might be designed as architectural features whilst other parts are hidden in roof valleys or behind parapets.



*Regular courses, but random widths of local slate fixed using a double-lap method under stone ridge pieces. Dumfries & Galloway.*





*The Seatown at Cullen, Moray, showing a wide range of slated and pantiled roofs. The Scots slate here is darker and smaller than the more regular blue Welsh slate. Pantiles were commonly used in Eastern Scotland where cheaper and well-ventilated roofs were needed, but slate was preferred on most houses.*



*Blackhouse at Arnol, Lewis. Thatching weighted down with stones on ropes.*

## Form

- 3.3 Historic roofs take an enormous number of forms from simple, practical coverings to flamboyant architectural statements.
- 3.4 Each roof has its own distinctive characteristics of height, shape, pitch and profile. Traditional roof forms were usually influenced by the types and weights of local covering materials and local climatic conditions. Scottish roofs tend to be steep, with slopes of around 40°. Steeper pitches drain water quickly and are less prone to let wind-driven rain or snow into the roof space.
- 3.5 The most common traditional form is a pitched roof with a single ridge running between two gables. M-shaped gables with two ridges and a valley between allowed increased building depth. From the mid 19th century many roofs were designed for picturesque or stylistic effect in many shapes and sizes with overhanging eaves, gabled dormers, turrets or other features. Technological advances and stylistic considerations allowed the construction of large-scale flat roofs from the early 20th century.

## Structure

- 3.6 Although not widely visible, structural elements underneath the roof covering contribute to the character and authenticity of a historic roof. Sometimes early structural elements survive where the roof covering itself has been replaced.
- 3.7 Structural elements before the 19th century were usually made of timber (with the exception of stone vaults), but the types of timber, jointing, finishing and arrangement of beams varied depending on the period and nature of the building. New structural use of wrought-iron, cast-iron and mild steel allowed increasingly large spans and forms of roof from the later 19th century.

## Covering materials: general

- 3.8 The colour and texture of different roof covering materials make a substantial contribution to the character of a building. Many traditional roofing materials can also develop attractive long-term weathering patterns.

## Thatch

- 3.9 From the earliest times covering materials were usually gathered from as close to the site of the building as possible. Turf, heather, straw, reed and other types of thatch were common domestic roofing materials until the end of the 19th century. They are becoming increasingly rare.

## Stone and slate

- 3.10 From the mid 17th century to the early 20th century, the use of slates or stone slates or tiles expanded from high-status buildings, such as churches and lairds' houses, to become the principal roofing materials for most building types in Scotland. Local slates predominated until the advent of industrial-scale

West Highland slate production and improved transport methods in the 19th century. Diverse traditions of slate-laying, influenced by the various materials and local conditions, are evident throughout the country. The use of varied sizes of slate on sarking boards allowed for many different shapes of roof and decorative patterns of laying.

### Pantiles

- 3.11 Clay pantiles laid on battens were in widespread use from the 17th century, particularly in East Central Scotland. Pantiled roofs are often 'bellcast' (a slight flattening of the roof near the eaves) to prevent lifting by the wind, or they have 3 to 5 courses of slate to protect the wallhead from driving rain or snow.

### Metals, felts and glass

- 3.12 Lead was another early roofing material, particularly where flat or shallow areas of roof were required. Industrial production methods in the 19th century were developed for coverings such as copper, corrugated iron, felts, tiles and glass. Many roofing innovations took place in the 20th century, but particular impact was made by the use of reinforced concrete and bituminous sheeting.

### Associated features

- 3.13 Associated roof features such as chimneys, dormers, cupolas, rainwater goods, and decorative ceramic, metal and timberwork can also be of significant value to the overall variety and interest of the roofscape.

## 4. GENERAL PRINCIPLES FOR REPAIRS AND ALTERATIONS

### Character and interest of the building

- 4.1 Alterations and repairs to roofs and their associated features should protect the character of the historic building. The contribution of the roof to that character should therefore be understood before considering how to alter the building.
- 4.2 A brief written analysis of the character of the building and the area of change will always be helpful in assessing proposals. The proposed alterations should take account of this analysis in specifying appropriate designs, materials and working methods.
- 4.3 Some areas of a roof will generally be more sensitive to change than others: alterations to subsidiary elevations and roof valleys are likely to have less visual impact on the character of a building. The interest of the underlying roof structure should also be considered.



*Clay pantiles and a 'catslide' dormer on a 17th-century house, Falkland, Fife. The roof sweeps up a little towards the eaves. © N. Haynes.*



*Glazed roof at the Botanic Gardens, Glasgow City. © N. Haynes.*



*Hand-hewn roofing timbers pegged together in a late 18th- to early 19th-century cottage. Pitlochry, Perth & Kinross.*





*Graded stone slates, laid in diminishing courses from the bottom to the top of the roof. Associated features include crowstepped gables, a corniced chimney and a decorative dormerhead dated 1694. Elgin, Moray. © N. Haynes.*



*A traditional iron rooflight set into a West Highland slate roof. The small size, low profile and 'portrait' format are typical characteristics. © N. Haynes.*

## Repairs

- 4.4 Wherever possible the repair of historic roofs should be carried out in traditional materials to match the existing. Replication of the type, dimensions, pattern and coursing of materials is important to maintaining the character of the roof. The use of slate, lead and other traditional materials not only protects the character and appearance of a building, but with regular maintenance they can also be extremely durable. Associated features, such as rainwater goods and chimneys, should also be repaired or renewed using appropriate traditional materials.

## Alterations

- 4.5 New work should normally match the original as closely as possible. The alteration of a roof can create additional space to allow the building as a whole to remain in use and develop with the needs of the occupants. In considering how to alter a roof it is important to understand the impact of the works on the roof itself and the appearance of the building or street as a whole. The potential for cumulative effects of similar developments should also be considered.

## Slate

- 4.6 It is recognised that Scottish slate is not currently in production and that second-hand supplies are limited. Where possible, existing slates should be re-dressed and reused. If it is necessary to specify new natural slate, regard should be given to finding the best modern equivalent in terms of colour, thickness, weight and texture of slate. Artificial slate or concrete tiles are not normally acceptable because they rarely match the durability and weathering qualities of natural slate.
- 4.7 If new slate is needed to make up a shortfall, it should be laid in the same way in terms of graded lengths and random widths, and older slates should be consolidated in more conspicuous parts of the roof.

## Dormers and rooflights

- 4.8 Early historic dormers should be retained. The addition of new features to principal or prominent roof slopes should generally be avoided. New dormers and rooflights should be appropriately designed and located with care.

## Ventilation

- 4.9 Ventilation of roofspaces is essential to avoid a build-up of damp. This can normally be achieved by means of discreet ventilators under the eaves or through redundant chimney flues. Where ventilation is required directly through the roof covering, the ventilators should be minimal in number, carefully selected to fit flush with the surrounding roof covering, and located to minimise their impact. Breathable materials are available for use beneath the final roof covering.

## Fixtures and renewable energy developments

- 4.10 New roof fixtures, such as satellite technology, should be located where they will not detract from the appearance of the building. In general, where new fixtures are proposed to be located on a roof, they should be carefully sited to avoid being visible from ground level or breaking the profile of the roof or chimneys. Separate guidance on small-scale renewable energy developments and external fixtures is available in Historic Scotland's *Managing Change in the Historic Environment: Micro-Renewables* guidance note.

## Reinstatement

- 4.11 Where a roof has previously been altered, consideration should be given to the reinstatement of traditional materials and original form, particularly where roofs have been badly altered, for example by the addition of concrete tiles that are too heavy for the supporting structure.

## Roof extensions

- 4.12 Removal of a historic roof and replacement with an additional storey, or storeys, should only be considered where the existing roof is not of significance to the character of the building, and the new work will form a similarly subsidiary feature. Roof extensions involving the removal of a serviceable historic interior to provide structural support should not be proposed. A roof extension may not fit comfortably where long views are important to the profile of a building. Where streets are narrow, the buildings are tall, and the new work is recessed from the wallhead, the visual impact of a roof extension is likely to be less.

## Chimneys

- 4.13 Historic chimneys can make an important contribution to the character of a roof and should be retained. Where repair is required, this should respect the original form and materials. If the structural stability of the chimney is unsound, like for like reconstruction should be encouraged.

# 5. ENERGY EFFICIENCY

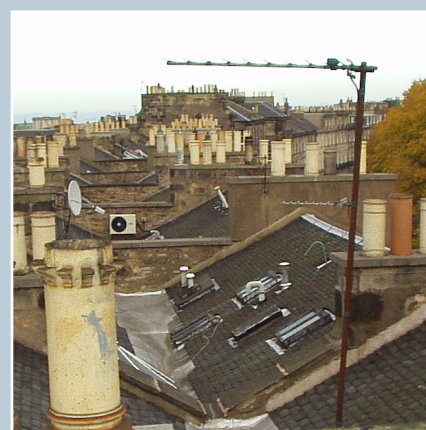
- 5.1 Proper repair and maintenance of historic roofs and associated features using appropriate and compatible materials and construction techniques is generally the most sustainable course of action. Historic Scotland publishes several practical guides and technical advice on maintaining various types of historic roof, details are given at the end of this leaflet.
- 5.2 Energy efficiency can normally be improved significantly without damage to historic character by insulation of the roofspace. However, it is important to retain adequate ventilation to prevent the build-up of moisture in this area.



*Badly designed box dormers detract from the classical proportions and elegant detailing of this late 18th-century house.*



*Sample panel prepared to ensure appropriate grading and random widths in the laying of new slate, with a fire-damaged Perthshire slate from Morgan Academy, Dundee.*



*Aerials, vents, rooflights, satellite dishes and air conditioning units located in roof valleys to minimise impact.*





*Solar panels being fixed to a roof at Lauriston Place, Edinburgh. Separate guidance on small-scale renewable energy developments is available in Historic Scotland's 'Managing Change in the Historic Environment: Micro-Renewables' guidance note.*

## 6. CONSENTS

- 6.1 Listed building consent is required for any work to a listed building that affects its character. The local authority determines the need for consent.
- 6.2 Planning permission may be required for works to unlisted buildings in Conservation Areas. Where consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and the proposed works in context. It is normally helpful to provide detailed technical information and photographs. A brief description of the interest of the roof and an explanation of the impact of the alterations are always useful in assessing change.

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

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EDINBURGH  
EH9 1SH

Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

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[www.historicscotlandimages.gov.uk](http://www.historicscotlandimages.gov.uk)

### Cover images

*Shetland Croft House Museum (circa 1870), Southvoe, Dunrossness, Shetland.*  
© N. Haynes.

*Cullen Seatown, Moray (from 1822).*

*Later 19th-century baronial villa, City of Edinburgh.* © N. Haynes.

## Other selected Historic Scotland publications and links

*Maintaining your Home – A Short Guide for Homeowners* (2007)

*Inform Guide: Energy Efficiency in Traditional Homes* (2008)

*Inform Guide: Repairing Scottish Slate Roofs* (2007)

*Inform Guide: Pantiles, Maintaining a Pantiled Roof* (2007)

*Inform Guide: Roofing Leadwork* (2008)

*Inform Guide: Bituminous Sheet Flat Roofs: Their Repair & Maintenance* (2008)

*Inform Guide: Care & Maintenance of Corrugated Iron* (2008)

*Inform Guide: Domestic Chimneys & Flues* (2008)

*Inform Guide: The Maintenance of Cast-iron Rainwater Goods* (2007)

*Inform Guide: Finials & Terminals* (2008)

*Inform Guide: Ventilation in Traditional Houses* (2008)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.



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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

## Setting





Above: Kilmartin Glen, Argyll and Bute. An important prehistoric linear cemetery composed of a number of burial cairns and standing stones. Intervisibility between elements of the complex, and views along the line of monuments, through and along the valley, are key to understanding each monument and the complex as a whole. © Kilmartin House Trust'

Cover image: Bronze-Age stone circle at Tomnaverie, Aberdeenshire. Many recumbent stone circles are located on elevated positions and are positioned to have wide-ranging views over the landscape. Views towards these monuments are also an important part of their setting as many appear skylined against the horizon.



# MANAGING CHANGE IS A SERIES OF NON-STATUTORY GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. THEY EXPLAIN HOW TO APPLY GOVERNMENT POLICIES.

The aim of the series is to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.

# INTRODUCTION

This note sets out the principles that apply to developments affecting the setting of historic assets or places, including scheduled monuments, listed buildings, Inventory historic gardens and designed landscapes, World Heritage Sites, conservation areas, historic battlefields, Historic Marine Protected Areas and undesignated sites.

Planning authorities usually make the initial assessment of whether a development will affect the setting of a historic asset or place. However, this may also be identified through other mechanisms such as an Environmental Impact Assessment (EIA) or Strategic Environmental Assessment (SEA). If a planning authority identifies a potential impact on a designated historic asset, it may consult Historic Environment Scotland, who act as statutory consultees in the planning process.

World Heritage Site status brings a commitment to protect the site's cultural significance and the Outstanding Universal Value for which the site is inscribed. This may include reference to aspects of setting.



Clava Cairns, Highland. An important Bronze-Age cemetery complex of burial cairns and standing stones. Intervisibility of elements of the complex is key to understanding the scheduled monument. © Crown copyright: Historic Environment Scotland. Licensor canmore.org.uk

**Below:** Fort Augustus lock flight, Caledonian Canal, Highland. Running from Inverness to Banavie, near Fort William, the scheduled Caledonian Canal represents the culmination of 18th-century canal construction in Scotland. The modern village of Fort Augustus developed along the locks, and views along the lock flight clearly reveal the relationships between the urban topography and the canal. © J. Malcolm



# KEY ISSUES

1. Setting can be important to the way in which historic structures or places are understood, appreciated and experienced. It can often be integral to a historic asset's cultural significance. Planning authorities must take into account the setting of historic assets or places when drawing up development plans and guidance, when considering environmental and design assessments/statements, and when making decisions on planning applications.
2. Where development is proposed it is important to:
  - identify the historic assets that might be affected
  - define the setting of each historic asset
  - assess the impact of any new development on this
3. Setting often extends beyond the property boundary or 'curtilage' of an individual historic asset into a broader landscape context. Both tangible and less tangible elements can be important in understanding the setting. Less tangible elements may include function, sensory perceptions or the historical, artistic, literary and scenic associations of places or landscapes.
4. If proposed development is likely to affect the setting of a key historic asset, an objective written assessment should be prepared by the applicant to inform the decision-making process. The conclusions should take into account the significance of the asset and its setting and attempt to quantify the extent of any impact. The methodology and level of information should be tailored to the circumstances of each case.
5. In the light of the assessment described above, finalised development proposals should seek to avoid or mitigate detrimental impacts on the settings of historic assets.
6. Advice on whether a planning application should include an assessment of the development's impact on setting should be sought from the planning authority.

## 1. WHAT IS 'SETTING'?

'Setting' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced.

Monuments, buildings, gardens and settlements were almost always placed and orientated deliberately, normally with reference to the surrounding topography, resources, landscape and other structures. Over time, these relationships change, although aspects of earlier settings can be retained.

Setting can therefore not simply be defined by a line on a map, and is likely to be unrelated to modern landownership or to curtilage, often extending beyond immediate property boundaries into the wider area.

Baltersan Castle, South Ayrshire. A category A listed 17th-century tower house, viewed from the 15th-century gatehouse of the adjacent Crossraguel Abbey. The medieval burgh of Maybole lies beyond, marked by the bell tower of the tolbooth. These elements of the late medieval / early modern Maybole area have clear visual and spatial relationships. © J. Malcolm

## 2. WHAT FACTORS CONTRIBUTE TO SETTING?

The setting of a historic asset can incorporate a range of factors, not all of which will apply to every case. These include:

- current landscape or townscape context
- views to, from and across or beyond the historic asset or place
- key vistas (for instance, a 'frame' of trees, buildings or natural features that give the historic asset or place a context, whether intentional or not)
- the prominence of the historic asset or place in views throughout the surrounding area, bearing in mind that sites need not be visually prominent to have a setting
- aesthetic qualities





- character of the surrounding landscape
- general and specific views including foregrounds and backdrops
- views from within an asset outwards over key elements in the surrounding landscape, such as the view from the principal room of a house, or from a roof terrace
- relationships with other features, both built and natural
- non-visual factors such as historical, artistic, literary, place name, or scenic associations, intellectual relationships (e.g. to a theory, plan or design), or sensory factors
- a ‘sense of place’: the overall experience of an asset which may combine some of the above factors

Defining the setting of a historic asset or place is case-specific and will ultimately rely on informed judgement, based on a range of considerations, including those set out above.

Cullen Seatown, Moray. In this conservation area the layout of the buildings is closely linked to the landscape context: on the north side of the village, gables face the sea to maximise shelter; here, on the south side, the houses are aligned to maximise light. © N. Haynes



### 3. ASSESSING THE IMPACT OF CHANGE

There are three stages in assessing the impact of a development on the setting of a historic asset or place:

- **Stage 1: identify the historic assets** that might be affected by the proposed development
- **Stage 2: define and analyse the setting** by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced
- **Stage 3: evaluate the potential impact of the proposed changes** on the setting, and the extent to which any negative impacts can be mitigated (see Section 4)

#### Stage 1: identify the historic assets

A desk assessment of historic environment records and other relevant material will provide the baseline information, identifying which assets will be affected and what is significant about them.

The initial approach should include all the potentially affected historic assets and places (including those relatively distant from the proposal) and their settings. It may be necessary to engage a suitably qualified historic environment consultant to undertake this identification and assessment.

Neist Point Lighthouse, Skye, Highland. The remote location and open views are important elements in the function and setting of the category B listed lighthouse. Seaward views are important, and views towards the lighthouse from shipping channels also form part of the setting.



## Stage 2: define and analyse the setting

The setting of a historic asset comprises our present understanding and appreciation of its current surroundings, and what (if anything) survives of its historic surroundings combined with subsequent historic changes. Answering the following questions often helps define a setting:

- How do the present surroundings contribute to our ability to appreciate and understand the historic asset or place?
- How does the historic asset or place contribute to its surroundings? For instance, is it a prominent or dominant feature in the landscape?
- When the historic asset or place was developed or in use (both originally and subsequently):
  - how was it intended to be viewed? From a distance? From other sites, buildings or specific points in the landscape?
  - what views was it intended to have? Wide views over the landscape or seascape? Confined views? Narrow alignment(s)?

Key viewpoints to, from and across the setting of a historic asset should be identified. Often certain views are critical to how a historic asset is or has been approached and seen, or understood when looking out. These views were sometimes deliberately manipulated, manufactured and/or maintained, and may still be readily understood and appreciated today. Depending on the historic asset or place these could include specific points

on current and historical approaches, routeways, associated farmland, other related buildings, monuments, natural features, etc.

Sometimes these relationships can be discerned across wide areas and even out to distant horizons. In other cases they have a more restricted view, defined and enclosed by topographical or built features. For some historic assets and places, both immediate and distant points of visual relationship are crucial to our understanding of them.

Changes in the surroundings since the historic asset or place was built should be considered, as should the contribution of the historic asset or place to the current landscape. In some cases the current surroundings will contribute to a sense of place, or how a historic asset or place is experienced.

The value attributed to a historic asset by the community or wider public may influence the sensitivity of its setting. Public consciousness may place a strong emphasis on an asset and its setting for aesthetic reasons, or because of an artistic or historic association. Such associative values can contribute to the significance of a site, and to the sensitivity of its setting.

Whether or not a site is visited does not change its inherent value, or its sensitivity to alterations in its setting. This should be distinguished from the tourism, leisure or economic role of a site. Tourism and leisure factors may be relevant in the overall analysis of the impact of a proposed development, but they do not form part of an assessment of setting impacts.

In certain circumstances the value attributed to a historic asset by the community or wider public may influence the sensitivity of its setting. Public consciousness may place a strong emphasis on an asset and its setting for aesthetic reasons, or because of an artistic or historic association. Such associative values can contribute to the significance of a site, and to the sensitivity of its setting. However, it is important to emphasise that an asset has a setting whether it is visited or not.

### Stage 3: evaluate the potential impact of the proposed changes

The impact of a proposed development on the setting of a historic asset or place can be a material consideration in determining whether a planning or other application is given consent, so thought must be given to whether new development can be incorporated

Aerial view of Kinross House (1684) and gardens and Lochleven Castle, Perth and Kinross. The category A listed house and gardens which feature on the Inventory of Gardens and Designed Landscapes, designed by Sir William Bruce as his main residence, used the castle and the island as a picturesque focal point in the landscape.

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sensitively. Depending on the nature of the historic asset or place, relatively small changes in the wider landscape may affect its setting.

Certain types of development require an Environmental Impact Assessment (EIA), which might include assessing the impact on the setting of a historic asset or place. Further information and advice about EIA can be found on our [website](#).

Factors to be considered in assessing the impact of a change on the setting of a historic asset or place include:

- whether key views to or from the historic asset or place are interrupted
- whether the proposed change would dominate or detract in a way that affects our ability to understand and appreciate the historic asset
- the visual impact of the proposed change relative to the scale of the historic asset or place and its setting





- the visual impact of the proposed change relative to the current place of the historic asset in the landscape
- the presence, extent, character and scale of the existing built environment within the surroundings of the historic asset or place and how the proposed development compares to this
- the magnitude of the proposed change relative to the sensitivity of the setting of an asset – sometimes relatively small changes, or a series of small changes, can have a major impact on our ability to appreciate and understand a historic asset or place. Points to consider include:
  - the ability of the setting to absorb new development without eroding its key characteristics
  - the effect of the proposed change on qualities of the existing setting such as sense of remoteness, current noise levels, evocation of the historical past, sense of place, cultural identity, associated spiritual responses
  - cumulative impacts: individual developments may not cause significant impacts on their own, but may do so when they are combined



Rosyth Castle, Fife. Once located on an island in the River Forth, the site was incorporated into the naval dockyards in the 20th century resulting in significant change to the scheduled monument's original setting. Any changes, including enhancement, need to be considered against the current setting.

Many Geographical Information Systems (GIS) packages support useful interpretative models, such as wireframes, viewshed analyses and digital terrain models. Graphic presentations such as photomontages, and landscape data-sets such as Historic Land-use Assessment (HLA), may also assist in reaching an understanding of a historic asset or place in the landscape and how development may affect it.

## 4. MITIGATION OF IMPACTS AND ENHANCEMENT OF SETTING

Where the assessment indicates that there will be an adverse impact on the setting of a historic asset or place, even if this is perceived to be temporary or reversible, alterations to the siting or design of the new development should be considered to remove or reduce this impact.

The most effective way to prevent impacts on setting is during site selection and early design. Any mitigation and enhancement proposals should be discussed as part of the pre-application process.

Burghead Harbour, Moray. Early 19th century listed granaries line the quayside. Their even spacing, scale and relationship to the wet dock and to the grid-plan town are relevant to an understanding of the setting. © N. Haynes

Other mitigation measures include screening the development, for example with trees or bunding (enclosing structures). However, the screening itself needs careful consideration so that it does not cause an impact in its own right.

It is also important to bear in mind that vegetation such as trees are subject to environmental and other factors (e.g. wind blow, felling and seasonal changes which affect leaf cover) and cannot necessarily be relied upon to mitigate adverse impacts of a development. In some cases, there may be potential for improving the setting of a historic asset or place, for example by opening up views through removing vegetation.





The Inventory garden and designed landscape at Crathes Castle, Aberdeenshire. The formality of the late 18th and 19th century gardens contrasts with the farmland beyond. © N. Haynes



## 5. FURTHER INFORMATION AND ADVICE

Historic Environment Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of its roles is to provide advice about managing change in the historic environment.

Information for designated heritage assets can be downloaded from Historic Environment Scotland's [\*spatial data warehouse\*](#) or viewed at [\*Pastmap\*](#).

The Hermitage. An 18th-century picturesque Inventory designed landscape, Perth and Kinross. Both William and Dorothy Wordsworth featured The Hermitage in their writing. Ossian's Hall (pictured) was placed to take advantage of views over the falls, and the sound created by them. These elements also contribute to an appreciation of the nearby woodland walks, and combine to form part of the setting.





Details of listed buildings and advice on the requirement for listed building consent, conservation area consent, building warrants and other permissions/consents should be sought from local authorities.

Most works at monuments scheduled under the Ancient Monuments and Archaeological Areas Act 1979 require scheduled monument consent. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Environment Scotland's [website](#).

Planning authorities also have their own historic environment records and policies in local development plans and supplementary guidance.

### Other sources of information

Mitigation measures in Environmental Impact Assessment (EIA) terms are explained in [Planning Advice Note \(PAN\) 1/2013](#):

Aerial photography and other records of the settings of historic structures or places can be obtained from Historic Environment Scotland, John Sinclair House, 16 Bernard Terrace, Edinburgh, EH8 9NX

Tel: 0131 662 1456,  
Fax: 0131 662 1477  
Email: [info@rcahms.gov.uk](mailto:info@rcahms.gov.uk)  
Web: [www.historicenvironment.scot](http://www.historicenvironment.scot)

The setting of heritage structures, sites and areas is the subject of the [ICOMOS Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas \(2005\)](#)

### Historic Land-use Assessment (HLA)

The HLA, developed by Historic Environment Scotland, is a GIS-based map that depicts the historic origin of land-use patterns, describing them by period, form and function. Its purpose is to enhance our knowledge and understanding of the historic dimension of the landscape and to inform management decisions relating to it. It highlights relict archaeological landscapes, aids understanding of the landscape context of individual sites and helps identify areas where further survey could be useful. It is available [here](#).

### Gardens and designed landscapes

The Gardens Trust has [Planning Conservation Advice Notes](#) on Development in the Setting of Historic Designed Landscape (Number 11 2008) and Briefs for Historic Landscape Assessments (Number 13 2008)

Scottish Natural Heritage (SNH) has also produced [landscape guidance](#):

### Wind energy development

The Scottish Government has produced [guidance for wind planning applications](#).

SNH has produced a [suite of documents](#) to assist in the process of assessing the potential impacts of wind farm proposals on Scotland's landscapes.

### Historic Marine Protected Areas

Guidance is located [here](#).



Balfarg henge and standing stones, Fife. An example of a scheduled monument now surrounded by a 1970s housing development: the two photos show the site before and after redevelopment. Upper image © Crown Copyright: HES. Licensor canmore.org.uk. Lower image © K. Brophy



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# Shopfronts & Signs



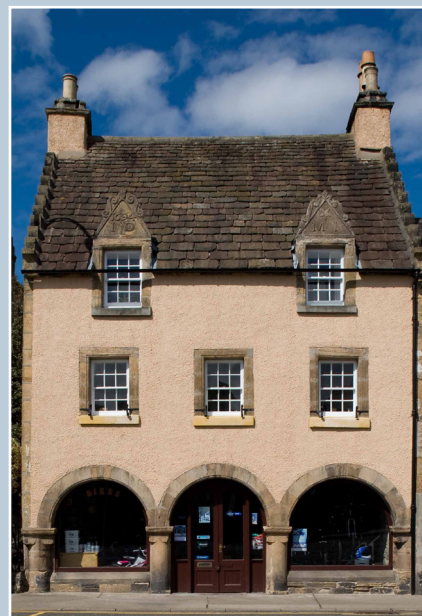


# Key Issues

- 1. Historic shopfronts contribute to the architectural quality of a building and to the character of a place. Listed building consent is required for any works affecting the character of a listed building.**
- 2. The interest of a historic shopfront can be derived from its architectural quality, fixtures and features and its historical and cultural associations. Regional variations and functional shop types are often identifiable in their form and details.**
- 3. Alterations to historic shopfronts to accommodate commercial needs such as security and signage or associated with a change of use can affect a building's visual amenity and character.**
- 4. Where historic shopfronts have been altered unsympathetically it may be possible to restore elements of the original or historic design on the basis of sound evidence.**
- 5. Planning authorities give advice on the requirement for listed building consent, advertisement consent and other permissions.**

## 1. INTRODUCTION

- 1.1 This is one of a series of guidance notes on managing change in the historic environment for use by planning authorities and other interested parties. The series explains how to apply the policies contained in the *Scottish Historic Environment Policy* (2009) ([SHEP](#), PDF 312K) and *The Scottish Planning Policy* (2010) ([SPP](#), PDF 299K).
- 1.2 This note sets out the principles that apply to altering historic shopfronts and signs. It should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Areas* (1998).
- 1.3 Monuments scheduled under the Ancient Monuments & Archaeological Areas Act 1979 require scheduled monument consent for any works. Where a structure is both scheduled and listed, the scheduling controls have precedence. Separate advice is available from Historic Scotland's website: [Scheduled Monuments: Guidance for Owners, Occupiers & Land Managers](#) (PDF 718K).



*Braco's Banking House (1694), High Street, Elgin. In the late 17th century a number of Scottish burghs adopted a continental model of arcades at the ground floor to house shops.*

## 2. WHY ARE SHOPSFRONTS IMPORTANT?

- 2.1 Historic shopfronts are important for the contribution they make to the character of a place and through their historical and cultural associations. Where a shopfront is part of the original design of a building it will contribute to the building's architectural significance.
- 2.2 Further guidance is given in Historic Scotland's publication *Historic Retail Buildings: a Short Guide for Shop Owners* (2009).

## 3. IDENTIFYING THE INTEREST IN A HISTORIC SHOP

- 3.1 Shops have evolved from medieval luckenbooths in the main street to more formal street frontages that display goods through increasing amounts of glass. Small panes gave way to plate glass from the 1840s, and curved glass came later. Regional variations and functional shop types are identifiable in their form and details.

A shop may demonstrate a combination of aesthetic, associated and historical interest:

- 3.2 **Aesthetic interest:** in for example its architectural form. Most shops draw their details from the classical vocabulary



*Buchanan Street, Glasgow, one of Scotland's premier shopping streets. Initially a residential street of Glasgow's second 'New Town', it was developed with shops from the 1820s.*



*A traditional mortar and pestle symbol outside the chemist in the High Street, Haddington, East Lothian.*

*Hanover Street, Edinburgh. These copper sculptures were designed to advertise a travel agency. That function has ceased but the artworks add value to the new shop and to the streetscene.*



of architecture: pilasters, consoles and cornices framing the window.

- 3.3 **Associated interest:** a shopfront might be valued for its association with a significant designer, craftsman, patron or historic event. It might also be important as a source of memory or for what it means to a group of people or a place.
- 3.4 **Historical interest** derives from the potential of a historic shopfront to provide evidence about the past. For example the use of common symbols such as a pestle and mortar for Pharmacists.
- 3.5 **Associated features** such as signage, canopies, awnings, gates and other traditional security features can also contribute to the character of a historic shopfront.

## 4. PRINCIPLES FOR REPAIR AND ALTERATION

- 4.1 In addition to the following, most Planning Authorities offer design guidance on new shopfronts as well as alterations to historic shopfronts.

### General

- 4.2 High quality historic shopfronts should be retained. Good examples of Georgian, Victorian, Edwardian and inter-war shopfronts are now scarce. Some newer, well-designed shopfronts which relate to the architectural quality of a building are also significant. The commercial purpose of a shopfront is to attract customers. This can present challenges for the historic



character of a building or place. A balance needs to be achieved between accommodating commercial needs such as signage and security and maintaining the historic significance of the shopfront. Shopfronts which straddle two separate buildings should acknowledge the architectural and structural divisions above.

- 4.3 Where historic details such as pilasters, capitals, console brackets, entablatures or cast-iron columns are found, an earlier shopfront may be at least partly recoverable. Even if only the cornice survives, this should be retained as a valuable demarcation line between the shopfront and the facade above. Stallrisers similarly contribute to the balance of a shopfront by providing a solid base for the display window. Good examples, including those in stone, timber, tile, iron or toughened glass (such as 'Vitrolite'), should be kept.

### Signage and advertising

- 4.4 The thresholds and door reveals of some premises, particularly those of dairies, fishmongers and butchers, occasionally display decorative tiles of high quality. Trade emblems such as fishmongers' carved wooden fish were common until recently. These are now rare and should be retained.
- 4.5 Lettering on fascias, windows and doors which contribute to the significance of a historic shopfront should be retained. New lettering must be carefully designed to respect the character of a building and be located appropriately. Fixings that cut across architectural detail or that sit uneasily against the form of the entrance or the surrounding façade should be avoided. Traditional hand-painted sign-writing is encouraged. Often this will not require consent if the building fabric is otherwise retained.
- 4.6 If a fascia is excessively deep or encroaches upon the first floor, the opportunity should be taken to create a fascia of more appropriate depth and height.
- 4.7 The number, design, illumination and siting of projecting signs should be carefully considered.

### Blinds and canopies

- 4.8 Traditional sun blinds or awnings are often found where a display window contained perishable goods. A traditional blind is a length of woven canvas attached to a folding metal frame and a roller which fully retracts into a box. These can sometimes be refurbished.
- 4.9 The introduction of new blind boxes to a historic shopfront should not mask or cut across detailing which contributes to the significance of a building. Where an external blind cannot be neatly accommodated, internal filter blinds or clear screens may be fitted to cut the transmission of UV rays.



*One of the cast-iron shopfronts that came to light during recent refurbishment of Dundee's Improvement Act streets.*



*Gardner's Warehouse, Jamaica Street, Glasgow. Now in use as a bar, this pioneering iron-framed building was constructed as a retail warehouse in 1855-6 for A Gardner & Son, cabinet makers and upholsterers. The original lettering was kept at first floor, and new lettering in a similar style fitted to match the new name at the ground floor.*



*Replacement fabric attached to the traditional awning mechanisms at McEwens, St John Street, Perth.*





Cockburn Street, Edinburgh. Original later 19th-century timber panelled security shutters that slide down into slots beneath the windows during the day. © N Haynes.



These modern removable external grilles by an artistic blacksmith were put into shops in place of less attractive fixed mesh as part of the Bo'ness Townscape Heritage Initiative.

- 4.10 Modern fixed canopy blinds are not a traditional feature of the street scene. They will rarely be appropriate on listed buildings and upon unlisted buildings within conservation areas. Even where there may be practical reasons for a canopy, fixings that cut across architectural detail or that sit uneasily against the form of the entrance or the surrounding facade should be avoided.

### Security

- 4.11 Externally mounted modern roller shutters can be difficult to accommodate on a historic shopfront. Alternatives can include removable external grilles, toughened glass or security film. There are also measures that can be taken internally to improve the security of a shopfront. These can include internal grilles and shutters. Planning authorities often offer planning guidance on appropriate shop front security measures.

### Other items

- 4.12 Other items which attach to, pass through or project forward of the facade, such as cash dispensing machines (ATMs), can affect the character of a building. New openings for these should avoid cutting through architectural features or disturbing symmetry. Lights and cabling should be located so as to minimise physical damage to the fabric.

### Restoration

- 4.13 It is often possible to restore shopfronts on the basis of sound research and physical evidence. Where an existing shopfront is unsympathetic and there is reliable evidence of what was there before, it may be appropriate to re-create the earlier frontage. However, where the existing shopfront is of interest, even if not original, it should be retained.

### Changes of use

- 4.14 Where a shopfront was part of the original design of a historic building it may contribute to its architectural quality. If conversion to another use such as residential is deemed acceptable, the work should fully respect the existing shopfront. The use of frosted glass and set-back mezzanine floors can help to overcome privacy issues where there are large areas of glazing.

## 5. CONSENTS

- 5.1 Listed building consent is required for any work to a listed shopfront that affects its character. The local authority determines the need for consent.
- 5.2 Where listed building consent is required, an application is made to the local authority. This should include accurate scale drawings showing both the existing situation and proposed works in context. It is normally helpful to provide detailed

technical information and photographs.

- 5.3 Many changes to shops require planning permission and advertisement consent may be required for any changes to signage. Other regulations such as the Food Hygiene Act, building standards and the Disability Discrimination Act 1995 also have implications and advice should be sought prior to undertaking any works.
- 5.4 Further guidance on access issues is given in Historic Scotland's *Managing Change in the Historic Environment: Accessibility* guidance note.



*A shopfront restored through the Arbroath Townscape Heritage Initiative.*

## Other selected Historic Scotland publications and links

*Historic Retail Buildings: a Short Guide for Shop Owners* (2009)

*Inform Guide: Ceramic Tiled Flooring* (2007)

*Inform Guide: Graffiti and its Safe Removal* (2005)

*Inform Guide: Fire Safety* (2005)

For the full range of Inform Guides, Practitioner Guides, Technical Advice Notes and Research Reports please see the [Publications](#) section of the Historic Scotland website.

## Other selected publications and links

[Conserving Scotland's Retail Buildings Seminar](#) (September 2008) (transcripts of talks given at this seminar).

## FURTHER INFORMATION AND ADVICE

Details of all individual scheduled monuments, listed buildings, designated gardens and designed landscapes, and designated wrecks can be obtained from Historic Scotland (see contact details below) or at: [www.pastmap.org.uk](http://www.pastmap.org.uk). Details of listed buildings can also be obtained from the relevant local authority for the area.

Advice on the requirement for listed building consent, conservation area consent, building warrants, and other permissions/consents should be sought from local authorities.

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Tel: 0131 668 8981 or 8717

Fax: 0131 668 8765

E-mail: [hs.inspectorate@scotland.gsi.gov.uk](mailto:hs.inspectorate@scotland.gsi.gov.uk)

Web: [www.historic-scotland.gov.uk](http://www.historic-scotland.gov.uk)

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### Cover images

*Art Nouveau glass in a shopfront of circa 1900, Main Street, Callander, Loch Lomond & The Trossachs National Park.*

*Tiled entrance to a former Buttercup Dairy shop (circa 1910), Warrender Park Road, City of Edinburgh. The tiles were designed by J. Duncan Ltd of Glasgow after a painting by Tom Curr. © N Haynes.*

*Interior of a late 19th-century chemist shop.*





HISTORIC  
ENVIRONMENT  
SCOTLAND

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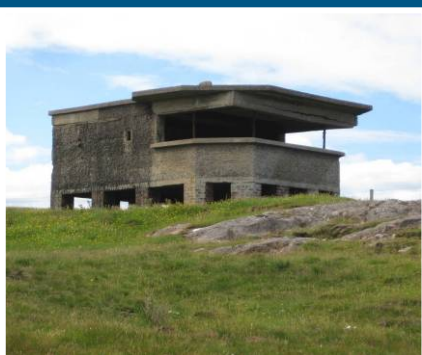
# Managing Change in the Historic Environment

Works on Scheduled Monuments  
Updated November 2016





# Key Issues



Scotland's scheduled monuments represent a wide range of nationally important sites, ranging from sites of the earliest known groups living in Scotland over 8000 years ago to 20th-century military defences.

1. There are over 8000 scheduled monuments in Scotland, which are recognised as being of national importance and are legally protected to ensure they are preserved for future generations.
2. Work on scheduled monuments may be required for a number of reasons. For example, management works to help arrest the natural erosion of a monument, consolidation works to stabilise a unstable structure, or works relating to land management practices.
3. Most works on scheduled monuments require scheduled monument consent from Historic Environment Scotland.
4. It is a criminal offence to undertake works without consent. Anyone undertaking unauthorised works may be liable to enforcement action or prosecution.

## 1. Introduction

- 1.1 This is one of a series of guidance notes on managing change in the historic environment. The series explains how to apply the policies contained in [Historic Environment Scotland's Policy Statement, June 2016](#) and [Scottish Planning Policy](#).
- 1.2 This note sets out the legal requirements relating to works on scheduled monuments under the [Ancient Monuments and Archaeological Areas Act 1979\\*](#) ('the Act'). It explains the process for applying for consent and the mechanisms for dealing with unauthorised works. In addition, the note aims to give owners, occupiers and land users clear guidance on their legal obligations when undertaking works on scheduled monuments, and sets out the approach Historic Environment Scotland takes when dealing with reports of unauthorised works.

## 2. Scheduled Monuments

- 2.1 Archaeological sites and monuments are part of our national and local identity, the physical remains of the lives of people who inhabited Scotland over the past 10,000 years. They are an important part of Scotland's history and contribute to education, tourism, sustainability, local distinctiveness, economy and quality of life.
- 2.2 Archaeological sites and monuments are often fragile and need careful management to ensure their survival. Designation by scheduling under the Act helps protect the most important examples of these sites and monuments in the national interest.

\* as amended by the Historic Environment (Amendment) (Scotland) Act 2011 and the Historic Environment Scotland Act 2014

- 2.3 Under the Act, a scheduled monument may comprise:
- any building, structure or work, whether above or below the surface of the land, and any cave or excavation;
  - any site comprising the remains of any such building, structure or work or of any cave or excavation;
  - any site comprising, or comprising the remains of, any vehicle, vessel, aircraft or other moveable structure, or part thereof;
  - any site comprising any thing, or group of things, that evidences previous human activities.
- 2.4 Currently over 8000 monuments are scheduled, ranging from sites of the earliest known groups living in Scotland over 8,000 years ago to 20th-century military defences, and from abbeys and castles to the traces of prehistoric and medieval farms. Most monuments are visible above ground (such as prehistoric burial mounds, forts, standing stones, ruined castles, churches, industrial sites), but others may leave no trace on the surface or are only visible from the air. Almost all scheduled monuments are likely to include below-ground archaeology, which often extends further than the upstanding visible features.
- 2.5 A monument is scheduled to secure its long term legal protection in the national interest, *in situ* and as far as possible in the state it has come down to us. Scheduled monuments have an intrinsic value as monuments, not related to any concept of active use.

### 3. How to find out if a monument is scheduled

- 3.1 The easiest way to find out if a monument is scheduled is to check our website [portal.historicenvironment.scot](http://portal.historicenvironment.scot). You can also download a copy of the legal documentation for a scheduled monument, which shows the extent of the scheduled area. Information on decisions related to designation and scheduled monument consent can also be found there.
- 3.2 Each scheduling document contains a written description of the scheduled area and a map indicating its extent. This description may include information about any exclusions within the scheduled area. If you are in any doubt about the location or extent of a scheduled area please contact Historic Environment Scotland.

### 4. Management of Scheduled Monuments

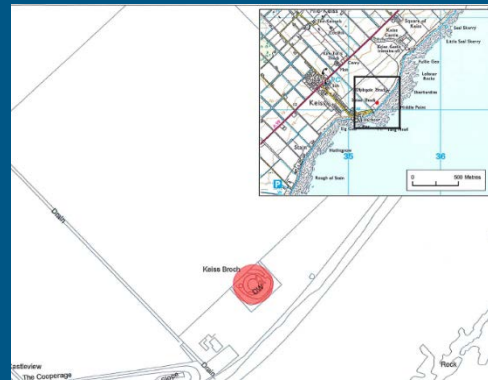
- 4.1 Many scheduled monuments are stable and require little attention, but some may benefit from simple changes in landuse which ensure no inadvertent damage occurs over the long term. Others may benefit from more proactive management which sometimes requires access to specialist conservation skills.
- 4.2 Once a monument is scheduled, the prior written consent of Historic Environment Scotland is required for most works, including repairs. Any person carrying out unauthorised works, or allowing unauthorised works to be carried out on a scheduled monument, is committing a criminal offence.



#### SCOTLAND'S SCHEDULED MONUMENTS 2016



Historic Environment Scotland's Leaflet 'Scotland's Scheduled Monuments 2016' provides useful information and advice on the scheduling process.



Scheduling documents contain a map showing the extent of the scheduled area and a text description of the area.

#### ABBREVIATED EXTRACT OF ENTRY IN THE SCHEDULE OF MONUMENTS

The monument known as Keiss Broch comprises a broch, complex stone-built substantial roundhouse, dating from the Iron Age (between 600 BC and 400 AD). The broch is visible as a low grass-covered stony mound with a central depression that contains traces of surviving walling and the entrance. It is located on a raised beach overlooking Sinclair's Bay.

The scheduled area is circular in plan, measuring 40m in diameter, to include the remains described above and an area around them within which evidence relating to the monument's construction, use and abandonment is expected to survive. The scheduling specifically excludes the above ground elements of the dry-stone wall and post-and-wire fence, to allow for their maintenance and upkeep.

- 4.3 There is no legal obligation on an owner to carry out proactive management works on a scheduled monument. However, Historic Environment Scotland encourages active management of monuments and can help by offering advice, grants and by entering into agreements. Historic Environment Scotland's Monument Management Grant programme provides financial assistance to help preserve and maintain monuments, and in some cases to present them to the public.
- 4.4 Historic Environment Scotland's Field Officers visit scheduled monuments and their owners on a regular basis. They check the condition of the site, offer advice on monument management and try to ensure that everyone with a current interest in the site knows about its protection.

## 5. Consent for works on Scheduled Monuments

- 5.1 Most works on scheduled monuments require scheduled monument consent from Historic Environment Scotland. Works requiring scheduled monument consent are defined as works resulting in the demolition or destruction of or any damage to a scheduled monument, any works for the purpose of removing or repairing a monument or any part of it or making any alterations or additions or any flooding or tipping operations on land in, on or under which there is a scheduled monument (see below).
- 5.2 A consent under section 42 of the Act is required for the use of any equipment capable of detecting metal within a scheduled area. This includes metal detecting, magnetometry, gradiometry and ground penetrating radar surveys. Non invasive survey of scheduled monuments is actively encouraged by Historic Environment Scotland as it can help to improve knowledge and understanding of the monument whilst causing no damage. For metal detecting surveys, section 42 consent will normally only be granted where the survey forms part of a wider research strategy, and provision is made for the conservation and reporting of finds. In all cases, the applicant should include evidence that the site owner is aware of the proposed survey and is content for the works to proceed.
- 5.3 Some types of works do not require scheduled monument consent to be applied for as consent for such works is granted under the terms of the [Ancient Monuments \(Class Consents\) \(Scotland\) Order 1996](#) ('the Class Consents Order'). Works covered under this Order include:
- Ploughing, where it has been undertaken lawfully in the preceding 10 years, providing that the depth of ploughing does not exceed previous depths. It is important to note that most changes to an agricultural regime (for example, deeper ploughing, de-stoning, sub-soiling or drainage works) would need scheduled monument consent;
  - Works which are urgently necessary in the interests of health or safety, provided that the works are limited to the minimum measures immediately necessary. Historic Environment Scotland must be notified in writing at the earliest opportunity and a full description and justification of the works provided;
  - Works executed under a management agreement with Historic Environment Scotland.

### **Examples of works requiring scheduled monument consent**

- (i) **works resulting in the demolition or destruction of or any damage to a monument**
- Excavation of any part of the monument
  - Removal of all or part of a monument
  - Insertion or repair of drainage
- (ii) **works for the purpose of removing or repairing a monument or any part of it or of making any alterations or additions thereto**
- Consolidation
  - Construction of new paths
  - Erection of temporary installations
  - Erection, removal or replacement of fencing, sign posts or boards
  - Field walking as part of archaeological survey
  - Removal of material
  - Erection of polytunnels
- (iii) **flooding or tipping operations on land in, on or under which there is a monument**
- Diverting a drain or altering the flow of a natural body of water resulting in the flooding of all or part of the monument
  - Importing of topsoil or other materials into the scheduled area, whether temporary or permanent

**Please note that this list is not exhaustive. If you are unsure whether a particular activity requires consent please contact Historic Environment Scotland for advice**



- 5.4 Some monuments are both scheduled and listed. Where this is the case only scheduled monument consent is required for any works.
- 5.5 Scheduled monument consent is separate from the statutory planning process. It may run in parallel in cases where planning permission is also required, and such cases are normally dealt with most effectively if applications for planning permission and scheduled monument consent are prepared at the same time.

6. Consent for works on Scheduled Monuments

- 6.1 Historic Environment Scotland's Policy Statement, June 2016, sets out policy on scheduled monument consent. It is the value of the monument to the nation's heritage that is the primary consideration in determining applications for scheduled monument consent. Works on scheduled monuments should normally be the minimum necessary to conserve the important features of a monument.
- 6.2 As each monument will require treatment specific to its individual characteristics, significance and condition, any proposed change to it must be fully and explicitly justified. Certain works may be appropriate at one monument, but not at another.
- 6.3 There is no charge to make an application for scheduled monument consent. Applications are made by completing an application form which can be downloaded from Historic Environment Scotland's website or requested from Historic Environment Scotland. Applications can be submitted electronically, or by post.
- 6.4 As applications can cover works ranging from the erection of a fence to the full consolidation or restoration of a ruinous building, the amount of information required will vary greatly. In applications for consolidation or restoration schemes, or where excavation is required, the involvement of a professional with appropriate experience will usually be necessary. More detailed guidance on the level of information required for various types of work can be found on Historic Environment Scotland's website.
- 6.5 Historic Environment Scotland aims to reach a decision on most applications for scheduled monument consent within eight weeks. Where proposed works would allow a greater level of intervention than the minimum level of intervention that is consistent with conserving what is culturally significant in the monument, Historic Environment Scotland is required to notify the application to Scottish Ministers. In these circumstances it may take up to 12 weeks to reach a decision. Historic Environment Scotland can refuse to entertain applications for scheduled monument consent where a similar application has been refused in the previous two years and there has been no significant change in any material considerations since the similar application was refused, or where the application is made at a time when a similar application is under consideration.
- 6.6 Pre-application discussions can simplify the process and help you to submit a valid application first time. Anyone can apply for scheduled monument consent, however an applicant must notify all owners, owners, occupiers and agricultural tenants of their.



Metal Detecting  
Yes or No?

METAL DETECTING, SCHEDULED MONUMENTS AND THE LAW

Historic Environment Scotland's Leaflet 'Metal Detecting: Yes or No?' gives more information on metal detecting on scheduled monuments.



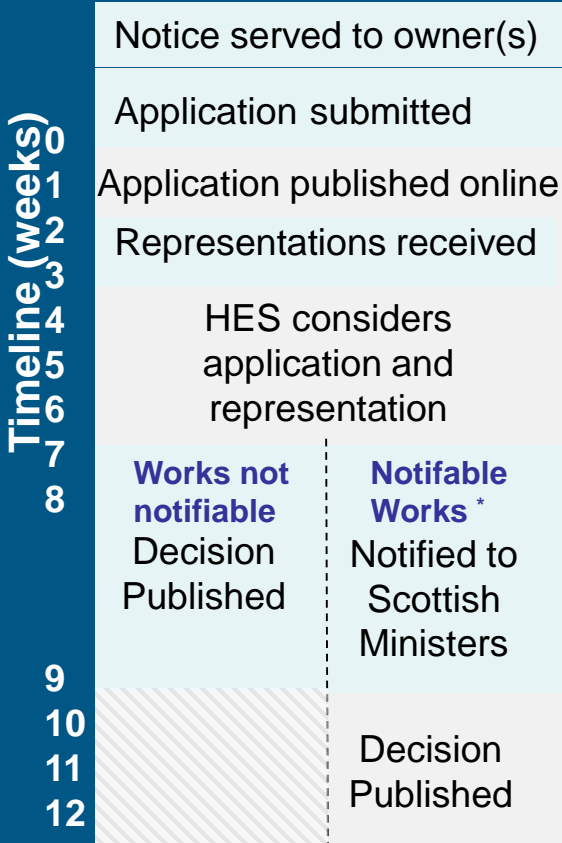
Loose masonry and slates can present a health and safety risk. Minimal work to remove the immediate threat can be undertaken under class consent.



intention to apply for scheduled monument consent. Owners have three weeks to make representations about the works proposed

- 6.7 Applications for scheduled monument consent must include:
- a written description of the proposed works
  - the name or location of the scheduled monument to which the works relate, or a description of the location of the land
  - the name and address of the applicant and, if appropriate, the name and address of the agent acting for the applicant
  - a plan or drawing sufficient to identify the area of land to which the works relate
  - any other plans and drawings necessary to describe the works in full
  - appropriate ownership certificates and notices – Other Parties Notification, if necessary, and Certificate of Ownership
- This is the minimum information required for an application to be valid. More supporting information may be needed to describe and justify more complex works proposed to a scheduled monument.
- 6.8 Historic Environment Scotland makes all scheduled monument consent applications and supporting information publicly available online during the application process. This usually happens within five working days of receiving a valid application. Personal information will be removed prior to publication – this may include signatures, personal email addresses and telephone numbers.
- 6.9 An application for scheduled monument consent may be:
- granted
  - granted with conditions
  - part granted/part refused
  - part granted/part refused with conditions
  - refused
- Conditions applied can include a condition reserving specified details of the works (whether or not set out in the application) for subsequent approval by Historic Environment Scotland.
- 6.10 Once an application is determined, the decision notice and handling report are published online. The handling report will address any representations made in relation to the application that were material to its determination.
- 6.11 Applicants have the right to appeal to Scottish Ministers against:
- refusal of an application for scheduled monument consent
  - granting an application for scheduled monument consent subject to conditions
  - refusal of an application for variation or discharge of conditions

## The Scheduled Monument Consent Process



### Notifiable Works

Historic Environment Scotland must notify Scottish Ministers of its intention to grant consent for any works to scheduled monuments which would allow a greater level of intervention than the minimum level of intervention that is consistent with conserving what is culturally significant in the monument. Examples of such works include archaeological research excavation and other interventions which have purposes other than the long term preservation of the monument. This may include access and interpretation works.

Once notified, Scottish Ministers will decide whether to call the application in for their own determination, or clear it back to Historic Environment Scotland.

### Enforcement notices

A scheduled monument enforcement notice allows for the reversal or amelioration of unauthorised works to a scheduled monument, or works in breach of any condition attached to scheduled monument consent in cases where such remedial works are desirable or reasonably practicable. The enforcement notice cannot take effect until at least 28 days after it has been served. There is no time limit for taking scheduled monument enforcement action. An appeal against an enforcement notice may be made to Scottish Ministers.

### Stop notices

A stop notice can only be issued alongside or after an enforcement notice and will come into effect not less than three days after being served.

### Temporary stop notices

A temporary stop notice can be issued to effect an immediate halt to unauthorised works. Unlike a stop notice, it does not require the issue of an enforcement notice. It can only be in force for a maximum of 28 days to enable the most appropriate enforcement action to be considered and undertaken during this time.

- granting subject to conditions an application for variation or discharge of conditions
- refusal of an application for subsequent approval required by a condition to which a scheduled monument consent is subject
- failure to determine scheduled monument consent or variation thereof within a two-month period

## 7. Compliance

- 7.1 Historic Environment Scotland will seek, wherever possible, to engage, encourage and inform those who own or manage scheduled monuments, in order to secure compliance. Where breaches of the law arise, enforcement action will be undertaken in a proportionate manner.
- 7.2 In pursuing compliance, Historic Environment Scotland may use a variety of approaches which include:
- **Discussion** – this may take place as part of seeking scheduled monument consent, as part of routine on-going compliance checks, site visits, and investigation of reports of unauthorised works or according to other needs or circumstances;
  - **Ensuring compliance through the granting of scheduled monument consent** - this includes granting, refusing, reviewing, varying, suspending or revoking consents;
  - **Advisory/ Warning letters** – these are used where unauthorised works have taken place, but no damage has occurred to the monument, or where conditions of consent have been breached without damage to the monument. The nature of the breach will be clearly explained in writing, and advice on how to avoid future breaches given. Where action is required to prevent a breach of legislation, or to comply with consent conditions, a timeline will always be included to show when compliance should be achieved;
  - **Notices** - a formal notice requiring compliance and amelioration (enforcement notice, stop notice or temporary stop notice) may be served by Historic Environment Scotland (see left);
  - **Direct Action** - where a person does not fully comply with an enforcement notice, Historic Environment Scotland can enter the land and carry out any unfulfilled requirements of an enforcement notice. Where direct action is taken, Historic Environment Scotland will seek to recover costs associated with such works;
  - **Reporting breaches of the Act to the Procurator Fiscal**, and recommending prosecution. Prosecution will be recommended only where it can be justified in order to punish offenders, to avoid a recurrence and/or to encourage improved compliance with the law.
  - **Seeking an interdict** - in cases where Historic Environment Scotland suspects unauthorised works are likely to take place in the future, a court order prohibiting such works may be sought;
  - **Retrospective scheduled monument consent** - where works have been carried out without consent, it may be appropriate and in the best interests of the scheduled monument to retain certain unauthorised works. In these cases an application for retrospective scheduled monument consent may be considered.
- 7.3 The objective of enforcement is to ensure that preventative or remedial steps are taken to protect a scheduled monument. Prosecution is one way to achieve that objective.

## Use of Enforcement Powers

Historic Environment Scotland is committed to the proportionate use of enforcement powers. We will seek to resolve issues speedily, openly, informally and amicably before resorting to the use of enforcement powers.

In most cases, working with stakeholders and raising their awareness of the requirements of the Ancient Monuments and Archaeological Areas Act 1979 will achieve the desired outcomes of improved compliance.

Breaches may arise for a variety of reasons and the type and severity of offence will vary considerably. Historic Environment Scotland's response will take into account why the breach has arisen, for example due to negligence or a deliberate act.

Historic Environment Scotland will be open, helpful, proportionate and consistent in its approach to enforcement action, and will ensure that individuals:

- receive clear explanations of what they need to do to comply;
- where appropriate, have opportunities to resolve differences before enforcement action is taken, unless immediate action is needed; and
- receive an explanation of their statutory rights of appeal, if any.

In applying this policy, Historic Environment Scotland will follow the principles set out below:

- all enforcement action undertaken by Historic Environment Scotland will be fair and reasonable.

Enforcement action will be recorded by Historic Environment Scotland and placed on its on-line enforcement register. Certain information may also be made available under the Freedom of Information (Scotland) Act 2002;

- all enforcement action will be recorded in writing and put on a working file. Records of meetings will be kept and actions and timescales will be recorded;
- action will be swift once the full facts are known. There will be no unnecessary delay.

Where appropriate, Historic Environment Scotland will liaise with other Agencies to ensure compliance (e.g. Police, Local Authorities and other government bodies).



Stabilisation works being undertaken on a fallen standing stone.



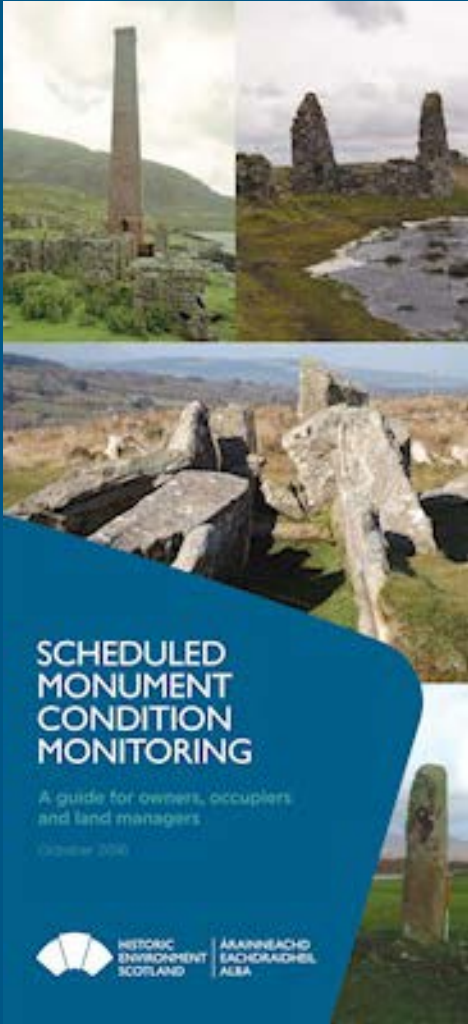
Archaeological excavations being carried out to assess the damage caused by the unauthorised erection of polytunnels across a scheduled souterrain.

8. Fines

Offence	Fine
To destroy or damage a scheduled monument, if the person knew or ought to have known that the monument was protected and intended to destroy or damage the monument, or was reckless as to whether the monument would be destroyed or damaged.	On summary conviction, to a fine not exceeding £50,000 or to imprisonment for a term not exceeding 6 months or both; or on conviction on indictment, to a fine or imprisonment for a term not exceeding two years or both.
To execute, cause or permit unauthorised works on a scheduled monument.	On summary conviction, to a fine not exceeding £50,000; or on conviction on indictment, to a fine.
Failure to comply with conditions of scheduled monument consent.	On summary conviction, to a fine not exceeding £50,000; or on conviction on indictment, to a fine.
Failure to comply with an enforcement notice, stop notice or temporary stop notice.	For each breach of notice, up to £20,000 on summary conviction or on conviction on indictment, to a fine.
Knowingly to provide, as part of a scheduled monument consent application, a certificate relating to the notification of owners, which contains false or misleading statements.	On summary conviction, to a fine not exceeding £1000.
Unauthorised use of a metal detector .	On summary conviction, to a fine not exceeding £1000.
Removal of any object of archaeological or historic interest discovered through unauthorised metal detecting survey.	Up to £10,000 on summary conviction or on conviction on indictment, to a fine.

9. Compensation

- 9.1 Compensation may be payable for refusal of scheduled monument consent in certain circumstances. These include works which are reasonably necessary for any development which had planning permission before a monument was scheduled, and works which are reasonably necessary for the continuation of use of a monument for any purpose for which it was in use immediately before the date of the application for scheduled monument consent.
- 9.2 Compensation may also be payable in certain circumstances in relation to the issuing of stop or temporary stop notices, in respect of any loss or damage directly attributable to the prohibition effected by that notice.
- 9.3 Compensation claims must be made within 6 months of refusal of scheduled monument consent or, in the case of stop and temporary stop notices, within 6 months from the date on which the stop notice ceases to have effect.



Historic Environment Scotland’s Field Officers make routine visits to scheduled monuments to provide advice to owners and record changes in the condition of the monument.





# Further information

## Scheduled monuments

There is more information about the scheduling process, management and advice on our website, including our Managing Change Guidance Notes

[www.historicenvironment.scot/advice-and-support](http://www.historicenvironment.scot/advice-and-support).

You can also phone us for advice on 0131 668 8716.

## Local authority archaeology services

Contact your local authority archaeologist or archaeology service for advice on development control matters and managing unscheduled monuments.

The Sites and Monuments Records

Forum [www.smrforum-scotland.org.uk](http://www.smrforum-scotland.org.uk)

[/her-contacts](#) provides contact details

for local authority archaeology services across Scotland.

## Relevant laws and policy

– Ancient Monuments and Archaeological Areas Act 1979

[www.legislation.gov.uk/ukpga/1979/46](http://www.legislation.gov.uk/ukpga/1979/46).

– Historic Environment Scotland policy statement [www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/historic-environment-scotland-policystatement](http://www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/historic-environment-scotland-policystatement).

– Managing Change in the Historic Environment. See our series of guidance notes on our website [www.historicenvironment.scot/adviceand-support/planning-and-guidance/legislation-and-guidance/managingchange-in-the-historic-environmentguidance-notes](http://www.historicenvironment.scot/adviceand-support/planning-and-guidance/legislation-and-guidance/managingchange-in-the-historic-environmentguidance-notes).

## Our publications

We have a range of publications about scheduling and scheduled monuments

[www.historicenvironment.scot/archives-and-research/publications](http://www.historicenvironment.scot/archives-and-research/publications).

## Suggestions and complaints

We welcome feedback about our publications. Please let us know what you think by sending an email to [hsenquiries@hes.scot](mailto:hsenquiries@hes.scot).

We are committed to providing high-quality services. We value complaints and use information from them to help us improve our services. If something goes wrong or you are not happy with our services, please tell us.

Complaints Officer  
Chief Executive's Office  
Historic Environment  
Scotland  
Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH  
Phone: 0131 668 8713  
Email: [complaints@hes.scot](mailto:complaints@hes.scot)  
You can find out more about our complaints procedure on our website.



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

World Heritage

September 2016





Above: Modern gates leading to the Antonine Wall at Croy Hill fit into the setting while also enhancing physical access to the Site and local landscape.  
© Crown Copyright Historic Environment Scotland

Cover image: The cultural landscape of St Kilda is an outstanding example of land use resulting from a type of subsistence economy based on the products of birds, cultivating land and keeping sheep. It reflects age-old traditions and land uses, which have become vulnerable to change particularly after the departure of the islanders. St Kilda is also inscribed for its diverse natural heritage and marine environment.  
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# MANAGING CHANGE IS A SERIES OF NON-STATUTORY GUIDANCE NOTES ABOUT MANAGING CHANGE IN THE HISTORIC ENVIRONMENT. THEY EXPLAIN HOW TO APPLY GOVERNMENT POLICIES.

The aim of the series is to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.



# INTRODUCTION

This note sets out the principles that apply to developments affecting World Heritage Sites, and the roles and responsibilities that organisations have to care for and protect these Sites. It should inform planning policies and help with decisions relating to planning applications affecting Sites. It also provides guidance on assessing the impact of development on World Heritage Sites.

This guidance note applies only to cultural World Heritage Sites. Scotland has six cultural World Heritage Sites: The Old and New Towns of Edinburgh, The Heart of Neolithic Orkney, New Lanark, Frontiers of the Roman Empire: The Antonine Wall, The Forth Bridge, and St Kilda. St Kilda has World Heritage status for its natural heritage as well as its cultural importance. For information about the natural heritage aspects of St Kilda World Heritage Site, see the websites of Scottish Natural Heritage and the National Trust for Scotland.

# KEY ISSUES

1. The World Heritage List represents the most significant, unique or best examples of the world's cultural and natural heritage. There are six World Heritage Sites in Scotland.
2. All World Heritage Sites have an associated Statement of Outstanding Universal Value (SOUV), which explains the importance of the Site.
3. Each World Heritage Site has a Management Plan. Management Plans provide a framework for the long-term protection and sustainable management of the Site's Outstanding Universal Value (OUV).
4. When changes to World Heritage Sites are planned, adverse impacts should be avoided where possible. Assessment should focus on the impact these changes could have on the OUV of the World Heritage Site.
5. Planning authorities should take World Heritage Sites into account when preparing Local Development Plans and making decisions on planning applications.

# I. WORLD HERITAGE SITES AND OUTSTANDING UNIVERSAL VALUE

World Heritage Sites are designated through the United Nations Educational, Scientific and Cultural Organisation's (UNESCO) World Heritage Convention (1972). World Heritage Site status is the only international designation for cultural heritage. World Heritage Sites are considered to have Outstanding Universal Value.

UNESCO defines Outstanding Universal Value (OUV) as being 'cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity'. OUV is therefore the reason that World Heritage Sites are considered to be of international importance. Any impacts on or changes to a World Heritage Site should be assessed in terms of its OUV.

OUV is defined for each Site when it is added to the World Heritage List (inscribed). It can only be changed by agreement with UNESCO's World Heritage Committee. The OUV for each World Heritage Site is explained fully in its nomination document and summarised in a Statement of Outstanding Universal Value (SOUV). These documents set out the reasons for the Site's inscription, and explain how the Site should be protected, conserved and managed for the long term.

## Attributes

Attributes are the specific qualities that convey the Site's OUV. Attributes can include both tangible and intangible elements. Tangible attributes might include buildings, monuments, landscapes or natural features. Less tangible attributes might include traditions, language, literature or art. Attributes can also include relationships and links between features and with their wider context or environment.

Attributes are described as having 'authenticity' and 'integrity'. This means that they relate clearly and coherently to the original form of the Site and so demonstrate aspects of its OUV. For further information, refer to UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention.

## 2. POLICIES AND GUIDANCE

### National policy and guidance

Scottish Planning Policy recognises the international importance of World Heritage Sites and requires planning authorities to protect and preserve a Site's OUV. This responds to the international importance of World Heritage Sites and the obligations associated with their inscription.

### Local policies and guidance

The purpose of local policies is to protect the OUV of the Site, in recognition of its international status. Local Development Plans set out local policies, and often give more detail in supplementary guidance. These documents are the main

source of reference in making decisions on planning applications. Strategic Development Plans may also contain policy on World Heritage Sites.

World Heritage Sites may have their own Local Development Plan policy, or they may be included in policies relating to

The wider landscape setting of Heart of Neolithic Orkney provides the essential context of the monuments, including other monuments that support the OUV of the World Heritage Site. The monuments on the Brodgar and Stenness peninsulas were deliberately situated in the landscape, and lie in a vast topographic bowl formed by a series of visually interconnecting ridgelines. They are also visually linked to other contemporary and later monuments, and form a fundamental part of a wider, highly complex archaeological landscape which stretches over much of Orkney. Ring of Brodgar Kite image © Kieran Baxter



other heritage designations. There may be separate planning policies for buffer zones (areas around the Site that help to protect the OUV).

## Site Management Plan

Each Site has a Management Plan, which sets out how it is to be managed sustainably. This includes the shared vision, long-term goals and shorter-term objectives to preserve the Site's OUV.

The Forth Bridge is the world's first monumental scale steel bridge and is a keystone achievement in bridge building and steel construction. It has iconic status as a triumph of historic engineering and continues in use today as a major transport artery. Here the later Forth Road Bridge can be seen in the foreground.

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The plan helps to explain the special qualities and values of the Site and establishes a framework for decision-making. Plans also provide information on threats and opportunities.

## Other cultural heritage policies

World Heritage Sites or individual elements within them may also be protected by other cultural heritage designations. This means that other cultural heritage policies may apply to them. Some protected heritage assets, such as listed buildings, may require separate consent from the planning process. It is therefore important to find out if there are any other designated assets that might be affected by proposals, and to consult relevant policies and guidance relating to them.

Each designated asset has to be considered in its own right. The fact that a designated feature falls within the World Heritage Site or its buffer zone also means that its relationship to the reasons for the Site's inscription must be carefully considered. Impacts on designated features, whether individually or collectively, may also impact on a Site's OUV. In some cases, this may be more significant than the impact on an individual designated feature.

Individual planning authorities can provide advice about consent requirements and local cultural heritage policies.



## 3. PROTECTING OUTSTANDING UNIVERSAL VALUE

### International context

World Heritage Sites are subject to international scrutiny in addition to national and local scrutiny. UNESCO provides clear *guidelines* for the required management, monitoring and reporting processes. These are briefly outlined below.

UNESCO requires national governments to ensure that the OUV of a World Heritage Site is protected and managed for the future. This is done through the relevant statutory and regulatory systems.

Governments must ensure that each World Heritage Site has a coordinated approach to the management of the Site and the protection of its OUV. They must put a suitable management system in place to allow this.

Governments must also monitor the state of conservation of their World Heritage Sites. They are required to notify the World Heritage Committee of any issues that might adversely affect a Site's OUV. This process is known as reactive monitoring. If the condition of a Site is a matter of concern, the World Heritage Committee may request a more detailed State of Conservation report.

Governments also have to undertake a Periodic Reporting process every six years. This involves preparing a detailed report of each Site's condition for the World Heritage Committee.

In exceptional circumstances, the World Heritage Committee may place a Site on the List of World Heritage in Danger or remove it from the World Heritage List.

### National context

When a Site is included on the World Heritage List it becomes a material consideration in the planning process. This means that those making decisions on planning applications must take it into account. No additional consent is needed for undertaking works which might affect a World Heritage Site

The OUV of World Heritage Sites is protected through existing designations and regulations. *Scotland's Third National Planning Framework* (NPF 3) recognises the value of World Heritage Sites as part of the historic environment. National guidance for planning (Scottish Planning Policy) and the historic environment (Historic Environment Scotland Policy Statement 2016) emphasises the need to consider the impact of development on OUV.

Planning authorities should have appropriate policies in place to protect the OUV of World Heritage Sites and their settings. These may include supplementary guidance and policies for buffer zones where they exist. A summary of current policies for each World Heritage Site is set out in the relevant *World Heritage Short Guide*.



The distinctive skyline of Edinburgh is one of the key attributes of the World Heritage Site. Key views around, into and out of the World Heritage Site have been captured in a Skyline Study that is instrumental in understanding their importance in protecting the Site's OUV from harmful development.  
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Each World Heritage Site in Scotland has an active [\*Management Plan\*](#). This is delivered by key partners, for example local authorities, Conservation Trusts and agencies such as Scottish Natural Heritage. Management Plans explain the significance of the Site, set out a vision for its sustainable management, and establish a framework for the protection and enhancement of its OUV.

A World Heritage Site, or parts of it, may also be protected through national or local heritage designations. These might include heritage assets such as scheduled monuments or listed buildings, which have consenting

regimes separate from the planning system. The normal statutory and regulatory controls for each designated asset still apply within World Heritage Sites.

## Defining the World Heritage Site

### Inscribed area

Once a Site has been added to the World Heritage List, only UNESCO's World Heritage Committee can change its defined boundaries. The extent of the inscribed area for each Site can be found on our [\*website\*](#).

## Buffer zone

Some World Heritage Sites have a formal buffer zone, established as part of the Site's inscription. The buffer zone is not part of the inscribed Site. It defines an area around it that helps protect its OUV.

In most cases, the buffer zone will include:

- the immediate setting of the World Heritage Site
- important views to or from it
- features or other attributes that support its OUV.

In some cases, the buffer zone may include buried archaeological evidence on the edge of the inscribed Site.

The aim of the buffer zone is not to preclude all development in the area. It is designed to ensure that all proposals for development within it are considered carefully, as they may have the potential to affect the World Heritage Site. When development is proposed in a buffer zone, it should be considered in terms of likely impact on the OUV, and the authenticity and integrity of the World Heritage Site itself.

## Setting

'Setting' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced.

The setting of a World Heritage Site can extend more widely than the limits of any formal buffer zone. Planning authorities may have identified key views that are important for a Site's OUV, to allow the impact of development proposals to be assessed against this baseline.

More guidance on assessing impacts on setting is available in a separate guidance note in this series: [\*Managing Change in the Historic Environment: Setting.\*](#)

The Antonine Wall (seen here at Rough Castle) constitutes the most north-westerly section of the Roman frontier system. Today the Wall passes through a highly varied modern urban and rural landscape, but the setting of the monument has been largely retained across the length of the Wall, allowing the mindset of the Roman engineers to be envisaged and its scale and setting appreciated.

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## 4. ASSESSING IMPACT ON OUV

Over time, changes will occur within World Heritage Sites. These may or may not impact on the Site's OUV. Impacts can be beneficial, neutral or adverse. Planning authorities have to consider development proposals carefully, to ensure that a Site's OUV is protected and preserved for the future. Development proposals that affect the setting of a World Heritage Site, or that fall within its buffer zone, must also be carefully considered in terms of the potential impacts on the Site's OUV.

Developers should assess the impacts of proposed development on OUV. Planning authorities will then consider this when making decisions on applications. They will also consider visual impact, impacts on buried archaeology, and the cumulative impacts of small-scale changes.

The following stages will help in assessing the nature of potential impacts on World Heritage Sites.

### Stage 1: Understand the World Heritage Site

Understanding a World Heritage Site includes:

- understanding the extent of the inscribed area, and of any buffer zone
- understanding the Site's OUV, attributes and key components
- identifying any designated heritage assets within the Site and its buffer zone
- checking specific policies governing the Site.

For each Site, the primary sources are the Nomination Document, the [Statement of Outstanding Universal Value](#), and the Attributes Statement (where available). Information on other heritage assets within or close to the Site can be found on [Pastmap](#).



The New Lanark Mill Hotel (right) is a sensitive restoration and reuse of one of the key buildings within the World Heritage Site. The Rooftop Garden on Mill No. 2, at centre, cannot be seen from within the village but allows visitors to experience spectacular views of the Site. New Lanark Trust's decision to develop the garden was influenced by the views of Robert Owen, who owned and managed the New Lanark cotton-mills from 1800 - 1825. He believed strongly in the importance of the environment and natural history, and argued that a pleasant environment was essential for happy, healthy communities. © New Lanark Trust





## Stage 2: Assess the potential impact of proposals on OUV

Assessing impact on a Site's OUV should include consideration of the relevant policies for the World Heritage Site, the buffer zone and the setting. Assessment should cover issues such as specific attributes, designated assets and key views.

The main tools for assessing impact on OUV are:

### Environmental Impact Assessment (EIA)

EIA is a process for identifying the environmental effects of development proposals. It aims to avoid, reduce and offset any adverse effects. Certain types of development, and development in environmentally sensitive areas, are more likely to require EIA.

This aerial view shows the Forth Bridge (top) in its wider context, with the Forth Road Bridge (centre) and the new Queensferry Crossing under construction (bottom). Visible from the Bridge and other key viewpoints, the new Crossing demonstrates that in some cases major change around the WHS can be accommodated without negative impact on the OUV of the Site. © Crown Copyright Historic Environment Scotland. Licensor canmore.org.uk

UNESCO's guidelines state that 'Impact assessments for proposed interventions are essential for all World Heritage properties.' World Heritage Sites are specifically mentioned in the EIA regulations as a factor which might influence whether or not EIA is required.

The EIA process should address the impact of proposals on a Site's OUV and its specific attributes. [Further guidance](#) is available on the Scottish Government's website.

## Heritage Impact Assessment (HIA)

HIA is used to assess and evaluate impacts on OUV. This includes any effects on specific attributes, setting and underlying archaeology.

The International Council on Monuments and Sites (ICOMOS) has produced [\*Guidance on Heritage Impact Assessments\*](#). UNESCO encourages assessors to refer to this and use it as a starting point in considering impacts.

When an EIA is required, this assessment should be incorporated into the process. When EIA is not a formal requirement, it is still essential to assess the impact of a proposal for change on the OUV of the World Heritage Site. The planning authority or conservation body may therefore request an HIA to show how proposals will affect OUV.

## Design and Access Statements/ Conservation Statements

Planning regulations require that some types of development will require a [\*Design and Access Statement\*](#). This normally applies to applications for national and major developments. However, local applications within a World Heritage Site will also require this.

These statements should ensure development proposals are based on a carefully considered design process. They should allow the applicant to explain and justify their proposals and help all those assessing the application to understand the design rationale that underpins them.

It is also good practice to submit a Conservation Statement where relevant.

This should inform the design process, by setting out the historical development of a Site and analysing its significance.

## World Heritage Site Management Plans

Management Plans provide information about the OUV of a Site and set out the key issues in relation to its protection and sustainable management. Management Plans are periodically reviewed and updated. Plans for each World Heritage Site are available online, and can be found on the website of the organisation with lead management responsibility for the Site, or via the [\*Historic Environment Scotland website\*](#).



A new pathway connecting key parts of the Heart of Neolithic Orkney World Heritage Site improved pedestrian access and road safety while respecting the OUV and the character of the Rural Conservation Area and taking account of local biodiversity.  
© Crown Copyright Historic Environment Scotland

### Stage 3: Mitigate impacts through design and enhancement

Proposals should seek to enhance the World Heritage Site and make a positive contribution to sustaining the Site's OUV for the future.

Good practice for mitigating adverse impacts identifies a hierarchy of preferred options. The highest of these is to avoid impacts. Where this is not possible, developers should aim to reduce impacts through design.

The above steps should help ensure that impacts on OUV are clearly understood. This information should be used to influence the design of proposals, aiming to increase beneficial impacts, and avoid and reduce adverse impacts.

Proposals should always seek to avoid adverse impacts on OUV. These may include incremental small changes with the potential to contribute to larger cumulative impacts. Pre-application consultation can help to identify such impacts at an early stage, and influence the development of proposals. Significant adverse impacts may result in a proposal being refused consent.

Opportunities to enhance World Heritage Sites should be identified as early as possible. Such measures are unlikely to avoid or reduce impacts, but may provide benefits for the historic environment. Contributions could include physical enhancements or improved access and interpretation.

The Scottish Storytelling Centre in the Old Town of Edinburgh is an example of a sympathetic contemporary intervention to the 15th Century John Knox House with a positive impact on OUV.  
© Crown Copyright Historic Environment Scotland



## Stage 4: Pre-application engagement

Historic Environment Scotland encourages pre-application consultation where a development may affect a World Heritage Site, or its setting, or is located within its buffer zone.

For national and major developments, this is a statutory requirement in the planning process. For these, a 'proposal of application' notice (PAN) must be submitted to the planning authority. This aims to raise awareness of a proposal at an early stage, and offers the opportunity to gather community views to inform the process.

Pre-application discussions and processing agreements for national and major developments enable the project management of complex applications. This consultation should include information required to assess the impact

on OUV, and provides an opportunity to resolve conflicting views about the nature of any potential impact.

Historic Environment Scotland strongly encourages pre-application discussions for all proposals. Such discussions are best led by the planning authority, and should draw out particular requirements for individual proposals. This helps to inform the developer as early as possible about the scope of information required at application stage.

Planning authorities may advise prospective applicants to consult other bodies as part of this process. Depending on the location and type of proposal, this may include organisations such as Historic Environment Scotland and Scottish Natural Heritage.

The Ministry of Defence structures on St Kilda do not form part of the Site's OUV. However, as the installation sits within the World Heritage Site care must be taken to ensure that changes to it do not adversely impact on OUV. © Crown Copyright Historic Environment Scotland







New Lanark would not exist without the ready power source offered by the River Clyde. The natural and designed landscape forms the setting and ambience of the Site and is intimately bound up with its value.  
© Crown Copyright Historic Environment Scotland

## Stage 5: The decision-making process

### Role of the planning authority

Local planning authorities are instrumental in the protection of the OUV of World Heritage Sites. They manage development proposals through every stage of the planning process. The planning system is the primary way that policies regarding designated heritage assets are implemented, and impacts are managed.

## Consultation with Historic Environment Scotland

Historic Environment Scotland gives advice on managing change affecting World Heritage Sites. Organisations that make decisions about development are legally required to consult Historic Environment Scotland if changes could affect a World Heritage Site.

If Historic Environment Scotland's advice is that the development should not go ahead, the planning authority must notify Scottish Ministers if it is considering granting consent. Scottish Ministers will then decide whether or not to call in the application, and make a decision on it themselves.

## Role of UNESCO and its advisors

UNESCO's World Heritage Committee requires the State Party (the UK Government) to inform it at an early stage about any proposals that may affect the OUV of a World Heritage Site. This means that the Committee can assist in seeking solutions to protect the Site's OUV. The Scottish Government expects the planning authorities and Historic Environment Scotland to advise when such reporting is necessary. This procedure is an essential part of the decision-making process for managing change within World Heritage Sites.

The World Heritage Committee may ask for a detailed State of Conservation report to help it to assess the impact of a proposed change. The UK Government is responsible for this reporting process, with support from the Scottish Government.

In reaching decisions on cultural Sites UNESCO's Committee is advised by ICOMOS. It may be invited to comment on proposals as they develop, in order to help find solutions that avoid adverse impacts on OUV.

## Other statutory consultees

Other organisations have a role to play in the decision-making process for World Heritage Sites. This might be as statutory consultees in the planning process, or as Site owners or managers: for example, Forestry Commission Scotland, Scottish Natural Heritage, Scottish Environment Protection Agency and Network Rail.

## Wider consultation

The Scottish planning system allows for consultation with interested parties and the wider public. This provides the opportunity for non-statutory consultees, such as Built Environment Forum Scotland or ICOMOS UK, to comment on proposals affecting World Heritage Sites.

## 5. FURTHER INFORMATION AND ADVICE

Historic Environment Scotland is charged with ensuring that our historic environment provides a strong foundation in building a successful future for Scotland. One of our roles is to provide advice about managing change in the historic environment.

### Policy

[Scottish Planning Policy \(2014\)](#)

[Historic Environment Scotland Policy Statement \(June 2016\)](#)

Other selected Historic Environment Scotland publications and links:

[Short Guides to World Heritage in Scotland](#)

[Managing Change in the Historic Environment: Setting](#)

Other selected publications and links:

[Convention Concerning the Protection of the World Cultural and Natural Heritage \(the World Heritage Convention\)](#)

[Operational Guidelines for the Implementation of the World Heritage Convention \(2015\)](#)

### Selected contacts

Scottish Natural Heritage World Heritage information:

[www.snh.gov.uk/protecting-scotlands-nature](http://www.snh.gov.uk/protecting-scotlands-nature)

UNESCO World Heritage Centre:

<http://whc.unesco.org>

Historic Environment Scotland  
Heritage Management Directorate  
Longmore House  
Salisbury Place  
Edinburgh EH9 1SH

Telephone 0131 668 8716  
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[www.historicenvironment.scot](http://www.historicenvironment.scot)

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# MANAGING CHANGE IN THE HISTORIC ENVIRONMENT

USE AND ADAPTATION OF  
LISTED BUILDINGS



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

APRIL 2019





Kirkmichael church, on the north side of the Black Isle, was restored in 2018 following a successful community project. Above, before restoration. Below, after works were completed © Kirkmichael Trust.





## INTRODUCTION

Managing Change is a series of guidance notes produced by Historic Environment Scotland in our role as lead public body for the historic environment. The series supports national level policy for planning and the historic environment. Planning and other authorities should take this guidance into account when making decisions.

Historic buildings enrich Scotland's landscape and chart a great part of our history. They are central to our everyday lives, creating a sense of place, identity and wellbeing. Some historic buildings are designated as 'listed buildings' because they have special architectural or historic interest. You can find out more about listing [on our website](#).

Listed building consent (LBC) is required for any works that would affect the special interest of a listed building. It is a criminal offence to carry out such work without consent. The LBC process is normally administered by planning authorities. The details of our role in the LBC process are set out [on our website](#).

This guidance note is the first place to look when thinking about how to keep a listed building in use, or bring it back into use. It is a key consideration when identifying options or making decisions about significant alterations to a listed building. It is aimed both at applicants and at those making decisions on LBC applications for changes to listed buildings.

[Scottish Planning Policy](#) states that 'listed buildings should be protected from demolition or other work that would adversely affect it or its setting' (paragraph 141). [Historic Environment Policy for Scotland](#) outlines the key policy considerations for making decisions about works that affect listed buildings:

### HEP2

Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.

### HEP4

Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

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## KEY MESSAGES

1. The listed buildings in Scotland reflect a wide range of our history and culture. They celebrate the diversity of our communities at every level, showing national, regional and local distinctiveness. They contribute to our well-being culturally, socially and economically. We can't have these benefits without caring for these buildings. We need to make sure they have a long term future if we want to benefit from in them in the long-term.
2. A listed building can't be replaced once it's gone. Demolishing a listed building is always a loss. It is a last resort when every other option has been explored. The best way to protect our buildings is usually to keep them in use – and if that isn't possible, to find a new use that has the least possible effect on the things that make the building special.
3. Decisions about listed buildings should always focus on the qualities that make them important – their special interest. Lots of things can contribute to a building's special interest, but the key factor when we're thinking about making changes will be its overall historic character.
4. For a building to stay in use over the long term, change will be necessary. This reflects changes over time in how we use our buildings and what we expect of them. This should always be considered carefully and avoid harming the building's special interest. A building's long-term future is at risk when it becomes hard to alter and adapt it when needed. Proposals that keep buildings in use, or bring them back into use, should be supported as long as they do the least possible harm.
5. Alterations to a building, even if they are extensive, will be better than losing the building entirely. If the only way to save a building is a radical intervention, we have to avoid being too cautious when we look at the options. If a building might be totally lost, we should be open to all the options to save it.
6. Keeping a listed building in use has wider benefits. Listed buildings contribute to their wider surroundings and community. They can influence proposals for new development, and inspire positive change. They teach us about what people value in the places they live, work, and spend time in, and so they help us to build successful places.



# GETTING STARTED

## HOW TO USE THIS GUIDANCE

The aim of this guidance note is to support, promote and enable the continued use, reuse and adaptation of listed buildings. It is focused towards buildings whose long-term future is uncertain.

It addresses the following scenarios.

- refurbishment of listed buildings so that they can remain in their existing use
- adaptation of buildings for new uses
- re-development of larger and more complex sites that may have a number of listed buildings or other heritage assets

Anyone responsible for listed buildings, such as owners and their agents, should use this guidance when identifying potential options.

Potential applicants for schemes of refurbishment that involve a high level of change or intervention should engage with the planning authority as early as possible in the process. The planning authority should involve us where the building is listed at category A or B or where demolition is being considered. If the planning authority is also the applicant, they should consult us for category C listed buildings as well.

Planning authorities should identify which national and local planning and historic environment policies they will use to assess an application at the earliest possible stage. They should give clear advice to the applicant on what supporting information will be required. This helps to avoid later delays. They should also seek our advice on these issues where relevant.

Further guidance on specific types of works and alterations to listed buildings is available in the [Managing Change series](#).

## DEMOLITION OF A LISTED BUILDING

When making a decision on the demolition of a listed building it is expected that the approaches to intervention and adaptation outlined in this guidance will have been investigated and results presented by the applicant. This document will form the basis of an assessment of whether all reasonable efforts have been made to retain a listed building. Further guidance on demolition is provided in our [Managing Change Guidance Note on Demolition of Listed Buildings](#).

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## CONSIDERATIONS THAT APPLY TO ALL BUILDINGS

Listed buildings, designated as being of special architectural or historic interest, are important. They enrich Scotland's towns and landscape and are central to our everyday lives. They help us to understand and learn about our culture and history. They show us – in a physical, tangible way – distinctive differences in national, regional and local character. They help give us all a sense of place, identity and wellbeing.

The best use of a listed building is often going to be the one for which it was designed. Keeping a building in the same use helps us to understand what the building was originally designed for. It can also help to protect any associations and special meanings that the building has – part of its intangible value.

Historic school buildings are a good example of listed buildings which have met the evolving needs of successive generations. They can provide a clear link to the past and sense of continuity between families and generations. Many of these buildings remain in use as places of learning, contributing to the identity and distinctiveness of local communities.

New uses may enable us to retain much of the fabric and special interest of a building, but they will always have an impact on its intangible value. The process of conversion will have some impact on a building's special interest, regardless of how well it is handled. The continued use of a listed building for its original function will normally be the best way to retain its historic character.

The continued use of buildings is sustainable and is often the least environmentally damaging option. The use and reuse of buildings retains the embodied energy expended in the original construction and sourcing of materials. Retention saves carbon associated with new-build, including costs in new materials, transport, demolition, landfill and new infrastructure.

Sometimes listed buildings are abandoned in favour of new buildings before their owners or users have fully explored options to reuse or adapt them. Reuse of a building is an opportunity to retain the best qualities of the building, whilst also providing high quality, new and upgraded facilities.

Incorporating an existing building within an overall scheme might require additional thought and deliberation, but can lead to a more considered, imaginative and ultimately successful place. Scotland has a long and successful history of reusing listed buildings for a variety of new uses. Historic buildings are readily suitable for adaptation to new uses, and features such as tall floor to ceiling heights and robust traditional construction can make them more adaptable and desirable.





The Speirs Centre, winner of the RIAS conservation and climate change award 2015. Originally a gymnasium and Victorian public baths. The project was comprehensively refurbished and extended in 2014, creating a civic centrepiece for Alloa © Clackmannanshire Council and © LDN Architects.





## THINKING ABOUT YOUR BUILDING

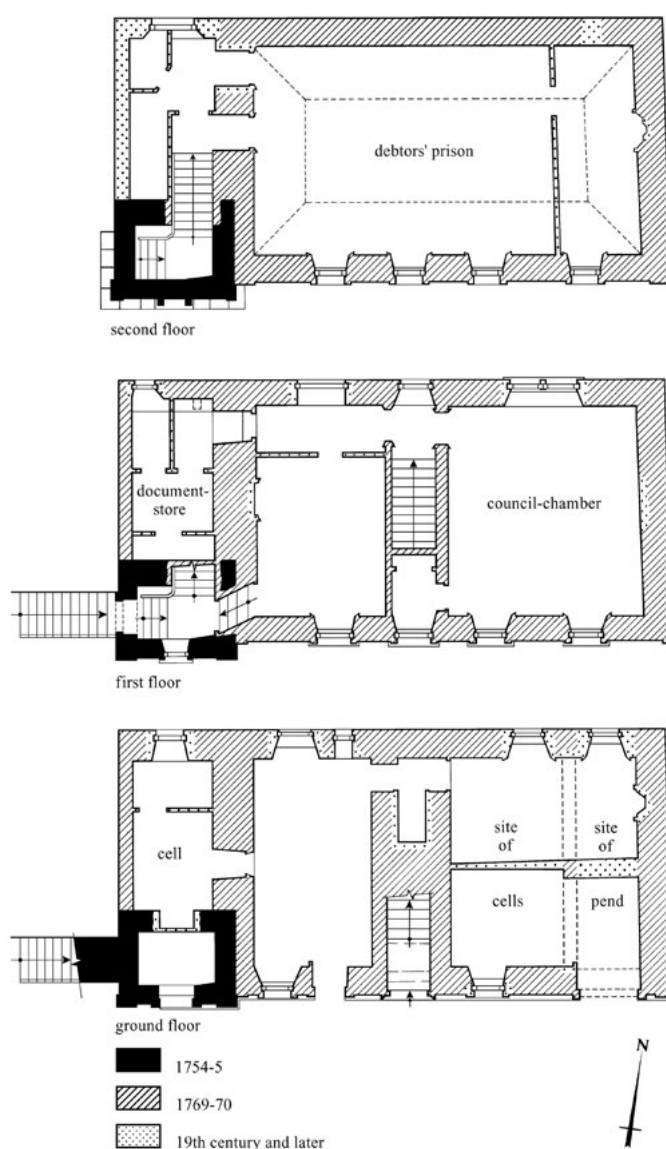
Most applications for alterations to listed buildings are approved. Listed buildings are often more capable of change than people realise; it is not only applications for minimal alterations that are successful.

Understanding what is important about a listed building is an essential first step in working out how to protect its special interest. This ensures the potential for conflict about its adaptation is minimised. Conflict is much more likely if the owners of the building, and the decision-makers, do not fully understand the special interest and significance of the listed building.

The particular qualities of a listed building that contribute to its special interest and significance will vary considerably. All listed buildings will include the physical evidence of the past preserved in their fabric, and some elements of their fabric may make a large contribution to the building's interest. They will also all have a certain architectural style which can be 'read' and understood – this might reflect local, national, or even international movements.

Some types of buildings are rarer than others, and some buildings will have survived with fewer changes – which will mean they are closer to their original design, structure and appearance. Buildings with a more public focus, such as schools and churches, and even pubs, may have wider associations and meaning within a community.

Lots of buildings are multi-phased. Buildings may have been successively extended, modified and added to over the years. In urban areas, the current boundaries of a site may have resulted from a connection of once separate buildings. In these cases in particular, it is unlikely that all the parts of a building or site have the same level of interest.



Plans of Inverkeithing Town House in Fife, showing the different phases of construction of the building  
© Courtesy of HES.



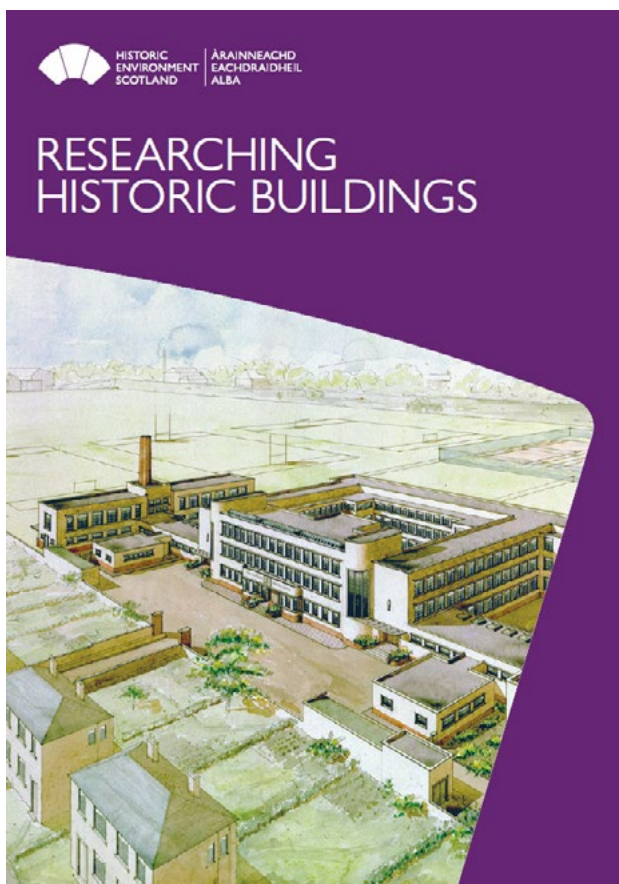
Anyone responsible for looking after listed buildings should have an understanding of the significance of a building or a site's component parts before planning changes to it.

Normally, the best way for owners to communicate the significance of a building is through an illustrated written document often called a conservation statement. The length and detail of a statement will depend on individual circumstances and in some cases a minimal statement will be enough. In more complicated circumstances, such as large buildings (or groups of buildings) with a complicated history of development, a more comprehensive statement might be required.

Conservation statements can sometimes be incorporated into other documents, such as design statements. Many planning authorities now ask for design statements as part of the LBC process. In other cases, it can be more helpful to produce a standalone document – this can allow the content to stay the same, even if the development proposals change and evolve.

If a listed building has a recent (or recently updated) list description this will likely provide a detailed overview of significance. In some cases this will mean that a more detailed assessment is not required. List descriptions can be found via the [Historic Environment Portal](#) on our website.

We have also prepared [a guide to researching historic buildings](#), which looks at the resources available for investigating the history of a building.



"Researching Historic Buildings" guidance published in 2018  
© Courtesy of HES.

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## APPROACHES TO SECURE THE CONTINUED USE OR REUSE OF LISTED BUILDINGS

Owners should consider all options to allow the continued use of a listed building. The adaptation, alteration, extension and even partial demolition of the building are all options which can, in the right circumstances, form part of the solution.

A solution may involve one, or a mix of, the following approaches:

- 1) Minimal intervention
- 2) Adaptation
- 3) Extension
- 4) Selective demolition
- 5) Enabling

Owners should investigate each approach carefully. Through this process, the vast majority of listed buildings can be adapted to either maintain their existing use, or secure a new one.

The best solution for a listed building will be one that secures its long-term future, while preserving as much as possible of its historic character. However, if the future of the building cannot be secured in a straight forward manner, more radical interventions may need to be explored.

[Case studies](#) can be found on our website which highlight these approaches.

### I. MINIMAL INTERVENTION

This is defined as being interventions with the least necessary impact to allow the use of a building. This is therefore a welcome conservation-based approach and will generally involve retaining most, if not all, of the building and its component parts. It can also involve repairing and restoring existing features, internally and externally, where necessary.

In a case of minimal intervention, any alterations proposed will be minor in nature. They may include the following:

- internal redecoration and refurbishment
- like-for-like replacement of component parts
- small-scale alterations
- upgrading of services within a building, including improvements to energy efficiency and access

This is very close to maintaining the status quo – or the ‘do-nothing scenario’. Some listed buildings can be easily refurbished. However, with many non-domestic buildings there will be other interests, likely to focus on the needs of the users of a building, which will mean that additional changes or interventions are needed.

Buildings that are used for education or health care are particularly likely to need additional alterations to remain in active use. This reflects how operational requirements have changed since many historic schools, hospitals and other facilities were built.



The Storehouse in Kirkwall opened in 2018.  
Originally built as a herring curing store, it was  
adapted and reused into a large restaurant on the  
ground floor with rooms on the two floors above  
© Start Point Media.





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## 2. ADAPTATION

Adaptation will normally involve working within the existing building envelope, focusing more on internal alterations. The first step towards finding a practical scheme of adaptation is to look critically at the existing building to see what alterations are necessary to make the building work. This could include the upgrading or insulating of the building to address heat loss. Smaller scale additions and removals might also be required.

The interest and quality of an interior will vary for each listed building. Some public buildings, like town halls, may have very important interiors, which should influence the approach taken. For the most part, buildings that are not used as homes, such as schools and hospitals, will have interiors that are utilitarian, and designed for use rather than appearance. They may therefore be capable of more radical change, including the removal of internal walls to create larger spaces.

The interiors of non-domestic buildings are also more likely to have been changed in the past. These alterations can affect their original character and appearance. If a building's interior is no longer making a meaningful contribution to its special interest, it is likely that further changes will not do more harm.

In certain circumstances, adaptation can provide opportunities to restore the appearance and special interest of a listed building. Conservation-based approaches can involve removing later additions of little interest on the exterior of a building. It can also include positive changes internally, such as reinstating missing features or taking down later partitions and suspended ceilings.

Changes like these can help to restore a building to its original plan-form and room proportions. Such works can often revitalise old buildings, giving them a new lease of life. Successful conservation-based solutions on one part of a site or building might balance out a higher level of intervention or additions elsewhere in the scheme – as long as these involve less significant elements.

## 3. EXTENSION

Many listed buildings have the capacity for some form of extension. In some cases buildings can successfully accommodate sizeable additions, particularly if the building is not domestic.

Sometimes an extension is essential to keep the listed building in use, for example where there is little scope for internal intervention or where the original building is very small. In these cases, the decision-maker will have to balance this against any adverse impacts.

There will also be some circumstances where all elevations of a building have been designed to be visible and appreciated. In these cases, other options for the site may have to be considered, including excavation for new facilities, or new free-standing buildings in the grounds.



## 4. SELECTIVE DEMOLITION

Selective demolition is a different consideration from substantial demolition, which would involve the total or substantial loss of a listed building.

Selective demolition involves the removal, or demolition, of parts of a listed building in order to enable the significant parts of a listed building to be retained. Later extensions of little interest, or even less important component parts of the original building are likely to be the best options for removal.

Most buildings have a primary 'display' frontage or principal façade, and often the building's side elevations were also intended to be seen. Important frontages were often the most elaborate or expensively treated and make a particular contribution to special interest. Changes to these areas are likely to have a higher impact on character.

Sometimes the extent of removal of fabric can be radical. The most extreme form of this is known as 'façade retention'. This term refers to the removal of all but the principal façade or façades of a building, with an entirely new structure built behind.

Façade retention schemes will not normally be appropriate because of the degree of loss they entail. However, in the right place, a façade retention scheme might be an appropriate course of action when no other options are feasible. This is usually in an urban context, particularly when the façades are of such special interest that they could continue to be a listed building in their own right, or where they make an important contribution to the surrounding townscape.

## 5. ENABLING

In the planning system, 'enabling development' has a very specific purpose; it allows development to take place which would normally be contrary to planning policies, in order to obtain a desired objective. This might include the reuse of a historic asset, particularly if it would mean saving it from continued deterioration and potential loss.

In such cases the enabling development should be the minimum necessary to secure the asset's future. In many cases the opportunity for enabling development will depend on the availability of land, which should not be parcelled up separately from the asset. The enabling development should be securely tied to the reuse of the historic asset through a planning or other legal agreement.

## BUILDINGS NOT IN USE

### MINIMISING RISK TO EMPTY OR UNDERUSED BUILDINGS

When a group or organisation moves out of a listed building, the building will often stand empty for a period of time. This is more likely to be the case in situations such as a school relocating, where the building may need a new use.

Once a building is empty or underused its long-term future is immediately at risk. It is often challenging to spend money on a building that has no readily identifiable use. This means that maintenance and minor repairs may stop, and the building can quickly fall into a cycle of decline. In the most severe cases, this can lead to the loss of the building. Unmaintained buildings can quickly deteriorate, and often attract other risks such as vandalism and arson.

One of the best ways to protect a building is to minimise any time it stands empty. If possible, the owner should start planning for the period in which the building will be empty well before they move out.

A quick turnaround from one use to another is likely to be better for the building, and more financially viable. However, this is not always possible; often time is needed to consider and develop schemes for alternative uses. Other processes, such as marketing and changes in ownership can also take time.

The only way to protect a vacant building and prevent it falling into disrepair is by routine maintenance. This is also the best way to make it more attractive to potential new owners.



Harlaw Hill House in Prestonpans is a case where a program of non-traditional repairs was undertaken to help avoid the total or substantial demolition of the A-listed building © Courtesy of HES.

Empty buildings can be viewed negatively and seen as eyesores, their potential masked by disrepair. In such cases the goodwill of the community towards a building may seep away if nothing is seen to be being done. Although 'mothballing' an asset may be successful in the short to medium term, it is not normally a long-term solution.

A range of actions can be taken to help manage the risk and to buy time to allow a long-term solution to develop. These can be broadly grouped as temporary fixes, and 'meanwhile uses'.

Temporary fixes normally involve the pragmatic use of cheaper non-traditional materials in repair works. This might include plastic rainwater goods instead of cast iron, felt instead of lead (particularly if theft is an issue) and metal sheeting or even tarpaulins in roof repairs.

Short term security measures or aesthetic works (for example, painted shop boarding) may also be helpful. Works of this type can tide the building over and will be reversible once a longer term solution to reuse the building is found.

A 'meanwhile use' is an occasional or temporary use of a vacant building or land until it can be brought back into long-term use. These can often be for storage, workshops or socially beneficial purposes, such as temporary offices for a charity. Maintaining a building in some sort of use, even as storage, will assist in safeguarding its long-term future.

Further and more detailed advice can be found in our [Buildings at Risk Toolkit](#).



100 High Street in Dumfries, known as 'the stove', opened in April 2015. Dumfries and Galloway Council agreed to provide a 25 year lease at £1 per year, £20,000 grant towards running costs for 3 years and a rebate on business rates. This once empty shop has now been converted to a cultural use © The Stove Network.



## FINDING A NEW USE

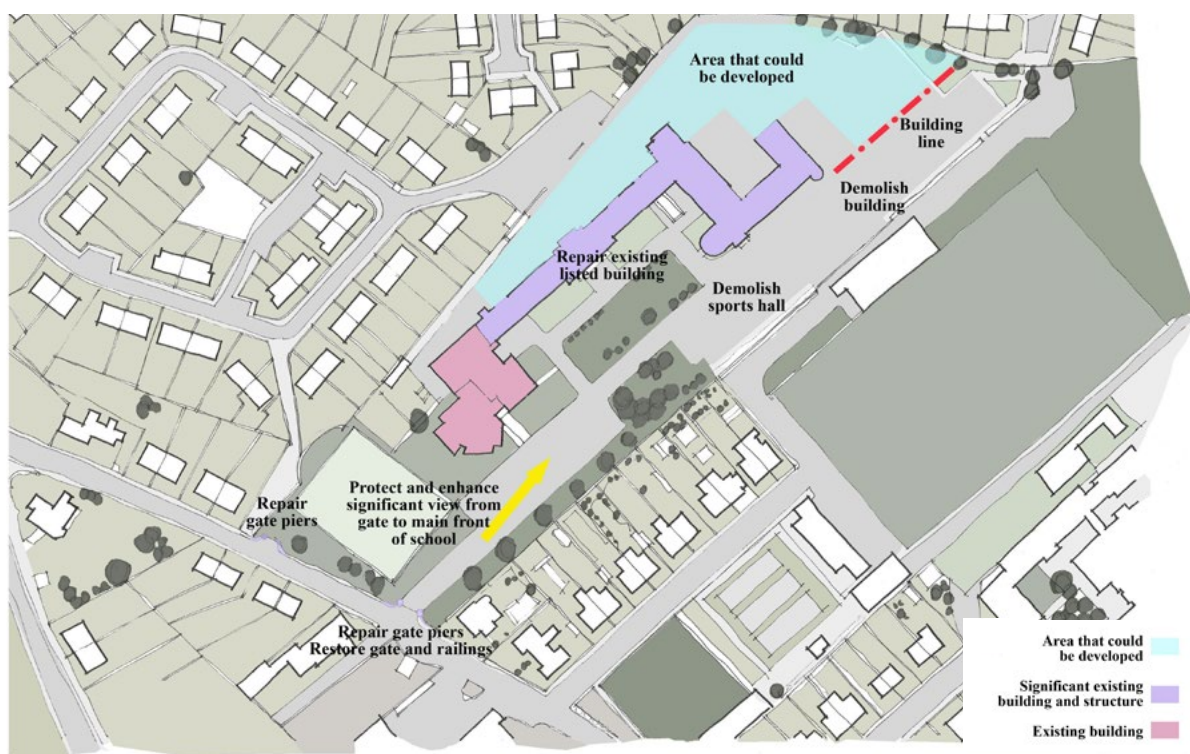
Normally, when a building changes use, it will involve a change of ownership. This will often happen when schools, hospitals or businesses relocate. With large sites, experienced developers will often be needed, due to the scale of works and finance required.

The reuse of listed buildings will have planning implications. Any proposals will have to comply with local and national planning policies. There may also be other issues to take into account when determining a planning application. These should be identified and made clear to all parties from the outset.

When putting a building or site to the open market there may be competing interests. The existing owner will want to maximise its sales value; potential new owners will want to make a profit; decision-makers will want to preserve the listed building in line with planning policy.

An effective way to manage expectations, and secure a good outcome, can be to promote a positive case for any development through the initial sales and marketing process. One way of doing this is for the planning authority to produce a planning brief, which can stand alongside a conservation statement. This should set out what is likely to be achievable for the site – and give prospective buyers more certainty.

A planning brief can cover a single building or, more commonly, be used to guide development over large sites which may include numerous heritage assets. These documents should form part of the sales literature, which may also include contact details for individuals involved within local authorities and, if applicable, us.



As part of the marketing process for Kelso High School, Scottish Borders Council produced a Concept Design Report which included an plan identifying the most significant parts of the site and areas of opportunities for new development  
© Simpson & Brown.



Wherever possible, it is best to sell sites as a whole, rather than sub-divided into lots. This allows for more coordinated redevelopment. In sites which have larger areas of open ground, some form of enabling development may be required to achieve the reuse of a listed building. As above, dividing the site into separate lots would potentially remove this option and put the reuse of the building at risk.

If possible, a planning brief should be in place (and the sales process initiated) before a listed building becomes empty. Briefs can also be used for sites that have been vacant for a long time and where it has been difficult to secure redevelopment. In some cases it may be helpful for the local authority to undertake a more comprehensive masterplanning exercise.

Where there are multiple buildings on a site, it is sometimes worth considering whether the removal of less significant buildings is possible in the interests of making the overall site more attractive to potential new owners. It may be helpful to make a start on the process for consents regarding these less significant buildings before marketing takes place.

## COMMUNITY OWNERSHIP

Concern for the future of an unused listed building may result in a community effort to take over ownership. A range of options exists, and might include:

- working in partnership with the owner
- leasing the building
- negotiating a private sale
- purchasing on the open market

Community Right to Buy (CRtB) now allows communities throughout Scotland to register an interest in land and the opportunity to buy that land when it comes up for sale. Further information on CRtB can be found on the [Community Ownership Support Service website](#).

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## FINANCIAL CONSIDERATIONS

### VALUING A LISTED BUILDING

For sites that contain listed buildings, the valuation of the land has to include the buildings, and take account of likely costs in repairing and reusing them. Prospective buyers should not pay a price inflated by an assumption that the listed building will be demolished.

If a buyer has assumed that a listed building can be demolished, this can cause significant delays. These delays can result in further deterioration in the condition of the building. The best way to make sure that any business decisions the buyer makes are fully informed is through early engagement at the beginning of the process.

### GRANT AID

Where the cost of works is higher than the end value, the difference is referred to as the 'conservation deficit'. Where proposals show a conservation deficit, grant aid may be able to help. Under our [Historic Environment Repair Grant program](#) we can offer grants from £10,000 - £500,000 to support conservation-standard repair projects. You can also find advice on further sources of funding [on our website](#).



The Dalkeith Corn Exchange was restored and converted in 2016 with grant assistance from ourselves. Previously a market hall, it was transformed into the Headquarters of a housing association and the Dalkeith Museum space. Above, historic photograph of the interior in 1924 © Dalkeith Museum and below the interior today © David Barbour and MLA.



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## SOURCES OF FURTHER INFORMATION AND GUIDANCE

### Strategy, policy and procedure

[Our Place in Time:  
The Historic Environment  
Strategy for Scotland](#)

[Historic Environment Scotland:  
Designation Policy and Selection  
Guidance](#)

[Historic Environment Scotland  
Circular : Regulations and  
Procedures](#)

[Historic Environment Scotland  
Policy Statement June 2016](#)

[Planning \(Listed Buildings and  
Conservation Areas\) \(Scotland\)  
Act 1997](#)

### Guidance

[HES Demolition of listed  
buildings](#)

[HES Use and Adaptation of  
listed buildings  
case studies](#)

[Managing Change in the Historic  
Environment guidance series](#)

[HES Technical advice notes  
\(TANs\), Short Guides, Inform  
Guides, and Practitioners Guides](#)

[Scottish Government Planning  
Advice Note \(PAN\) 71:  
Conservation Area Management](#)

### Online resources

[Historic Environment Scotland  
website](#)

[Designation records  
and decisions](#)

[Buildings at Risk Toolkit](#)

[HES role in Listed building  
consent and Conservation area  
consent](#)



Cover image:

The High Mill at Verdant Works in Dundee was restored in 2015. Originally a jute mill, it was restored and adapted to create a Jute Museum @ Dundee Heritage Trust.



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HISTORIC  
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SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

Historic Environment Scotland  
Longmore House  
Salisbury Place  
Edinburgh EH9 1SH

Telephone 0131 668 8716  
Email [HMEquiries@hes.scot](mailto:HMEquiries@hes.scot)  
[www.historicenvironment.scot](http://www.historicenvironment.scot)

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This edition published April 2019

## **10. REPRESENTATIONS IN RELATION TO PLANNING APPLICATION**

# Comments for Planning Application 21/0243/IC

## Application Summary

Application Number: 21/0243/IC

Address: 13 Kelly Street Greenock PA16 8NF

Proposal: Proposed new build 4-storey block of 4 flats

Case Officer: James McColl

## Customer Details

Name: Miss Beth Houston

Address: 11D Kelly Street Greenock

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I feel that the proposed appearance of the new build flats are not in keeping with the style of the rest of the flats in the conservation area.

Also, the street is already congested at present, particularly at school times. With more flats being built, this will add to further congestion with work vans and scaffolding, and once the flats are completed and occupied more cars will be added to street as well.

PLANNING NUMBER: 21/0243/1C

06 OCT 2021

To WHOM IT MAY CONCERN  
I OBJECT TO THE BUILDING  
OF FLATS AT 13 KELLY STREET  
GREENOCK OUR STREET IS  
EAT TOO CONGESTED JUST NOW  
WITH THE SOCIAL CLUB AND SCHOOL  
OUR GARDEN WOULD BE OVER  
LOOKED BY MORE WINDOWS AND  
OUR LIGHT AFFECTED DURING  
DAY LIGHT HOURS ESPECIALLY  
THE SUMMER PLEASE DONT  
LET THIS GO AHEAD

BETH HOUSTON

11D KELLY STREET

GREENOCK

PA16 8LA



Sandra Mclean  
11a, Kelly Street  
Greenock  
PA16 8NF

23. 9. 2021

Planning number 21/0243/1c

I strongly oppose the building of flats at 13, Kelly street, we have too much congestion on the street as it is from the school and social club, our back garden will be shaded from the building and over looked by more windows, Please don't allow this to go ahead

Yours

Sandra  
Mclean

**11. DECISION NOTICE DATED 21 DECEMBER 2021  
ISSUED BY HEAD OF REGENERATION &  
PLANNING**

# DECISION NOTICE

## *Refusal of Planning Permission*

Issued under Delegated Powers

**Regeneration and Planning  
Municipal Buildings  
Clyde Square  
Greenock PA15 1LY**

**Planning Ref: 21/0243/IC**

*Online Ref: 100456458-001*

***TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997  
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)  
(SCOTLAND) REGULATIONS 2013***

**Mrs Dorothy McMenemie  
13 Kelly Street  
GREENOCK  
PA16 8NF**

**Nicholson McShane Architects  
Custom House  
1-01 Custom House Place  
GREENOCK  
PA15 1EQ**

With reference to your application dated 16th August 2021 for planning permission under the above mentioned Act and Regulation for the following development:-

**Proposed new build 4-storey block of 4 flats at**

**13 Kelly Street, Greenock, PA16 8NF**

### **Category of Application**

The INVERCLYDE COUNCIL in exercise of their powers under the abovementioned Act and Regulation hereby refuse planning permission for the said development.

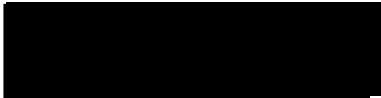
The reasons for the Council's decision are:-

1. The proposal fails to accord with the principles set out in paragraph 29 of Scottish Planning Policy and it cannot be concluded that the proposal constitutes sustainable development and is the right development in the right place.
2. The proposal by virtue of the detail of the design approach and use of materials at this location fails to preserve or enhance the Greenock West End Conservation Area contrary to the requirements of Policy 28 of both the 2019 adopted Inverclyde Local Development Plan and the 2021 proposed Inverclyde Local Development Plan.
3. By developing the original rear curtilage of the existing building fronting Union Street the proposal would be to the detriment of the setting of the listed building it is also not supported by Policy 29 of both the 2019 adopted Inverclyde Local Development Plan and the 2021 proposed Inverclyde Local Development Plan.
4. The proposal fails to have regard to the six qualities of successful places as required by Policy 1 of both the 2019 Inverclyde Local Development Plan and 2021 proposed Inverclyde Local Development Plan, specifically as it fails to reflect local architecture and urban form and contribute positively to historic places under the "Distinctive" heading and fails to avoid conflict in respect of window to window privacy under the "Safe and Pleasant" heading.

5. No off-street parking is provided and the proposal does not therefore meet with the requirements of Policy 11 of the 2019 adopted Inverclyde Local Development Plan and Policy 12 of the 2021 proposed Inverclyde Local Development Plan
6. The proposal fails to follow the advice and guidance within paragraph 8.2 of the Greenock West End Conservation Area Appraisal which highlights a presumption against development within the original plots in the Conservation Area.

The reason why the Council made this decision is explained in the attached Report of Handling.

**Dated this 21st day of December 2021**



**Mr Stuart W. Jamieson**  
**Interim Service Director**  
**Environment and Economic Recovery**

- 1 If the applicant is aggrieved by the decision of the Planning Authority to refuse permission for or approval required by condition in respect of the proposed development, or to grant permission or approval subject to conditions, he may seek a review of the decision within three months beginning with the date of this notice. The request for review shall be addressed to The Interim Head of Legal and Democratic Services, Inverclyde Council, Municipal Buildings, Greenock, PA15 1LY.
- 2 If permission to develop land is refused or granted subject to conditions, and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the planning authority a purchase notice requiring the purchase of his interest in the land in accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997

**Refused Plans: Can be viewed Online at <http://planning.inverclyde.gov.uk/Online/>**

Drawing No:	Version:	Dated:
20053_LP	Rev A	08.07.2021
20053_D.001	Rev A	03.09.2021
20053_C.002		08.07.2021



**12. NOTICE OF REVIEW FORM DATED 13 MARCH 2022  
WITH SUPPORTING STATEMENT FROM  
NICHOLSON MCSHANE ARCHITECTS**



Municipal Buildings Clyde Square Greenock PA15 1LY Tel: 01475 717171 Fax: 01475 712 468 Email: devcont.planning@inverclyde.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100542911-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

☐ Applicant ☒ Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Nicholson McShane Architects		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Douglas	Building Name:	Custom House
Last Name: *	Nicholson	Building Number:	1-01
Telephone Number: *	01475 325025	Address 1 (Street): *	Custom House Place
Extension Number:		Address 2:	
Mobile Number:		Town/City: *	Greenock
Fax Number:		Country: *	Scotland
		Postcode: *	PA15 1EQ
Email Address: *	consents@nicholsonmcshane.co.uk		

Is the applicant an individual or an organisation/corporate entity? \*

☒ Individual ☐ Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text" value="Mrs"/>	You must enter a Building Name or Number, or both: *
Other Title:	<input type="text"/>	Building Name: <input type="text"/>
First Name: *	<input type="text" value="Dorothy"/>	Building Number: <input type="text" value="13"/>
Last Name: *	<input type="text" value="McMenemie"/>	Address 1 (Street): * <input type="text" value="Kelly Street"/>
Company/Organisation	<input type="text"/>	Address 2: <input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: * <input type="text" value="Greenock"/>
Extension Number:	<input type="text"/>	Country: * <input type="text" value="Scotland"/>
Mobile Number:	<input type="text"/>	Postcode: * <input type="text" value="PA16 8NF"/>
Fax Number:	<input type="text"/>	
Email Address: *	<input type="text" value="REDACTED"/>	

## Site Address Details

Planning Authority:	<input type="text" value="Inverclyde Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text" value="13 KELLY STREET"/>
Address 2:	<input type="text"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text" value="GREENOCK"/>
Post Code:	<input type="text" value="PA16 8NF"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="676605"/>	Easting	<input type="text" value="227399"/>
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## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

Proposed new build 4 storey block of 4 flats

## Type of Application

What type of application did you submit to the planning authority? \*

- ☒ Application for planning permission (including householder application but excluding application to work minerals).
- ☐ Application for planning permission in principle.
- ☐ Further application.
- ☐ Application for approval of matters specified in conditions.

What does your review relate to? \*

- ☒ Refusal Notice.
- ☐ Grant of permission with Conditions imposed.
- ☐ No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Refer to separate Statement of Appeal

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

☐ Yes ☒ No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)



Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

Statement of Appeal Design Statement (refused) Drawing 20053\_D.001 (refused) Drawing 20053\_D.002 (refused) Drawing 20053\_LP (refused)

## Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

21/0243/IC

What date was the application submitted to the planning authority? \*

16/08/2021

What date was the decision issued by the planning authority? \*

21/12/2021

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

☒ Yes ☐ No

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

☒ Yes ☐ No

Is it possible for the site to be accessed safely and without barriers to entry? \*

☐ Yes ☒ No

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant? \*

☒ Yes ☐ No

Have you provided the date and reference number of the application which is the subject of this review? \*

☒ Yes ☐ No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

☒ Yes ☐ No ☐ N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

☒ Yes ☐ No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

☒ Yes ☐ No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

## **Declare – Notice of Review**

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mr Douglas Nicholson

Declaration Date: 13/03/2022



## **Statement of Appeal**

### **Refusal of Planning Application 21/0243/IC**

#### **Proposed new build 4-storey block of 4 flats at 13 Kelly Street, Greenock, PA16 8NF**

## **Description of Proposal**

The applicants wish to obtain Planning Permission for a block of four small flats on ground owned by them adjacent to their property at 13 Kelly Street / 14 Union Street, Greenock. The site is located within Greenock Town Centre and the flats would provide a valuable and sustainable addition to the housing stock in this sought-after location with ready access to local shops and businesses and to public transport.

## **Reasons for Refusal**

The Planning Decision Notice lists six reasons for refusal of the application. We note that the application has been assessed against two versions of the Local Development Plan simultaneously (the adopted 2019 LDP and the proposed 2021 LDP). This effectively doubles the list of policies that the proposal, in the opinion of the Planning officer, does not comply with. The analysis of the reasons for refusal will point out where Policies from the respective LDPs are similar.

## **Analysis of Reasons for Refusal**

### **Reason 1**

This reason for refusal asserts that the proposal fails to accord with the requirements of paragraph 29 of Scottish Planning Policy. Paragraph 29 lists 13 criteria which should guide decisions. To claim that our proposal falls foul of these criteria is a value judgement at best; indeed Paragraph 29 also encourages the planners to “give due weight to economic benefit” and to support “delivery of accessible housing... development”. We contend that assessment against paragraph 29 should ultimately be a more nuanced process than a simple statement claiming that our proposal doesn’t comply.

### **Reason 2**

The Planners’ assessment that our proposal fails to accord with Policy 28 of both the adopted and proposed Local Development Plans is again a value judgement. Our contention is that the proposed design interprets the tenement form which dominates this part of Greenock’s West End in a modern

and appropriate way, with consistency of colour, proportion and form contributing to a harmony with the adjacent properties.

#### Reason 3

Policy 29 of the adopted and proposed Local Development Plans requires that “Proposals for development affecting a listed building, including its setting, are required to protect its special architectural or historic interest”. The listing notice (LB34155) for 14 Union Street states the following:

“Re-categorised as C(S) from B for Group (2006). The listing relates specifically to the group interest of the subject”.

It is clear that the architectural importance of the listing is to its contribution to the townscape formed by the properties on the north side of Union Street from the Tontine Hotel to St John’s Church, all of which are listed. Our proposal has a negligible effect on this protected townscape.

#### Reason 4

The Planner’s view that the proposal fails to comply with Policy 1 of the adopted and proposed Local Development Plans is again a value judgement. This reason for refusal claims that our proposal is unacceptable as it is not “distinctive” despite the Report of Handling claiming elsewhere that it isn’t acceptable due to the differences between it and its neighbours. The claim that the proposal fails to be “safe and pleasant” due to window privacy issues is in our view extreme and could be managed by way of a condition appended to a consent.

#### Reason 5

Inverclyde Council’s parking standards (i.e the standards contained in the Roads Development Guide) allow for an unspecified amount of flexibility where development is centrally located and will be well served by walking and cycling routes and by public transport. Our proposal lies within Greenock’s designated Town Centre and thus has excellent links of this type. Our contention is that few sites are better located to be serviced locally and to minimise the requirement for car ownership and that no flexibility has been extended to the applicant.

#### Reason 6

Section 8.2 of the Greenock West End Conservation Area Appraisal by the Scottish Civic Trust makes 12 recommendations on the handling of decisions affecting the historic fabric. The recommendation in question states that “There will be a presumption against development within the original plots in the conservation area and new developments shall follow existing plot ratios”. This is unintelligible as it seems to seek to preclude any form of development within any plot in the conservation area while also giving guidance as to how dense such development should be. In truth, these recommendations are guidance and require interpretation and careful application to inform sensible decisions.



## **Summary**

This proposal is for a modestly scaled and proportioned block of 4 flats in a relatively inconspicuous location within the Conservation Area. It will make a valuable contribution to housing within the sustainable location of the Greenock Town Centre. We believe that the refusal of application 21/0243/IC should be overturned by the Local Review Body to allow this small scale development to proceed.

NMA February 2022.

**13. SUGGESTED CONDITIONS AND ADVISORY NOTES  
SHOULD PLANNING PERMISSION BE GRANTED  
ON REVIEW**

## **Planning application 21/0243/IC**

### **Suggested Conditions**

1. That the development hereby permitted shall be commenced within 3 years of the date of this permission.
2. That prior to their use, samples of all facing materials shall be submitted to and approved in writing by the Planning Authority. The approved materials shall thereafter be used unless a variation is agreed in writing with the Planning Authority.
3. That prior to the commencement of development, full details shall be submitted to and approved in writing by the Planning Authority of drainage arrangements on the site. The approved measures shall, thereafter, be implemented in full prior to the first flatted property hereby permitted being occupied.
4. That all surface water run-off shall be contained within the site.
5. That confirmation of connection to the Scottish Water Network shall be submitted to and approved in writing by the Planning Authority prior to the commencement of development.
6. That prior to the start of development, details of a survey for the presence of Japanese Knotweed shall be submitted to and approved in writing by the Planning Authority and that, for the avoidance of doubt; this shall contain a methodology and treatment statement where any is found. Development shall not proceed until appropriate control measures are implemented. Any significant variation to the treatment methodology shall be submitted for approval, in writing by the Planning Authority prior to implementation.
7. That the development shall not commence until an Environmental Investigation and Risk Assessment, including any necessary Remediation Scheme with timescale for implementation, of all pollutant linkages has been submitted to and approved, in writing by the Planning Authority. The investigations and assessment shall be site-specific and completed in accordance with current codes of practice. The submission shall also include a Verification Plan. Any subsequent modifications to the Remediation Scheme and Verification Plan must be approved in writing by the Planning Authority prior to implementation.
8. That before the development hereby permitted is occupied the applicant shall submit a report for approval, in writing by the Planning Authority, confirming that the works have been completed in accordance with the agreed Remediation Scheme and supply information as agreed in the Verification Plan. This report shall demonstrate that no pollutant linkages remain or are likely to occur and include (but not limited to) a collation of verification/validation certificates, analysis information, remediation lifespan, maintenance/aftercare information and details of all materials imported onto the site as fill or landscaping material. The details of such materials shall include information of the material source, volume, intended use and chemical quality with plans delineating placement and thickness.
9. That the presence of any previously unrecorded contamination or variation to anticipated ground conditions that becomes evident during site works shall be brought to the attention

of the Planning Authority and a Remediation Scheme shall not be implemented unless it has been submitted to and approved, in writing by the Planning Authority.

10. The applicant shall submit to the Planning Authority a detailed specification of the containers to be used to store waste materials and recyclable materials produced on the premises as well as specific details of the areas where such containers are to be located. The use of the residential accommodation shall not commence until the above details are approved in writing by the Planning Authority and the equipment and any structural changes are in place.

### **Reasons**

1. In compliance with Section 58 of The Town and Country Planning (Scotland) Act 1997.
2. To ensure the appropriateness of the facing materials.
3. To ensure the adequacy of all drainage arrangements.
4. To prevent the flooding of adjacent properties.
5. To ensure the provision of the appropriate connection.
6. To help arrest the spread of Japanese Knotweed in the interests of environmental protection.
7. To satisfactorily address potential contamination issues in the interests of human health and environmental safety.
8. To ensure contamination is not imported to the site and confirm successful completion of remediation measures in the interest of human health and environmental safety.
9. To ensure that all contamination issues are recorded and dealt with appropriately.
10. To protect the amenity of the immediate area, prevent the creation of nuisance due to odours, insects, rodents or birds.

### **Advisory Notes**

1. All external lighting on the application site should comply with the Scottish Government Guidance Note "Controlling Light Pollution and Reducing Lighting Energy Consumption".
2. The sound insulation should have regard to advice and standards contained in the current Scottish Building Regulations.