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Carey SJ (Sandra)

From: Elliott S (Scott)
Sent: 03 July 2007 12:26
To: Planning and Sustainable Development
Subject: Historic Scotland's comments on Statutory Guidance on Planning and Sustainable Development.

Thank you for giving Historic Scotland the opportunity to comment on Statutory Guidance on Planning and Sustainable Development. Apologies for our late reply.

The consultation document will no doubt incorporate our earlier comments on the internal draft but we wish to suggest the following alterations to the text.

Page 3, paragraph 10,

Under "planning should", a new bullet point should be added: "Where possible, existing buildings should be re-used or regenerated in order that the energy embodied within such structures from its initial construction is preserved, which has a lower impact than embodied energy costs of new build on the same site, and maintains the local character of an area."

Page 5, paragraph 18

The sentence "Further advice on the application of the standards to traditionally constructed buildings is due to be published shortly by Historic Scotland, to help facilitate the re-use of existing domestic and industrial buildings." Should be replaced with:

Historic Scotland's TCRE Group and SBSA have recently produced *Guide for Practitioners No. 6, Conversion of Traditional Buildings: Application of the Scottish Building Standards* which assesses the implications of the application of the new building standards to pre-1919 traditionally constructed buildings. This Guide provides advice to help facilitate the re-use of existing domestic and industrial buildings and has the same status as SBSA's Technical Handbooks, requiring formal consideration along with other SBSA documents.

Page 5, under "general principals"

Our previous suggestions included a mention that traditional buildings, and the "performance in use" of the materials from which they are constructed, is one of the better ways to illustrate the issue of sustainability, and that something that has performed well for an extended period should not be omitted from the sustainable agreement. This suggestion has not been incorporated in to the new document, and as such it is suggested again here.

Page 7, under "Using Sound Science Responsibly"

Drawing on advice from key agencies is undoubtedly a positive step. However, mention is only made of how climate change will impact, with the UKCIP given as an example. Suggest the following is added:

"Research from across Governmental departments and agencies relating to the built environment, transportation, and the environment shall, where necessary, be drawn upon to inform the decision making process"

Page 10, under "Encourage reuse of existing buildings where possible"

We again suggest an amendment to the existing text to read: "Planning authorities should promote reuse of existing domestic and industrial buildings, including consideration of established

and possibly historic infrastructure. Regeneration should be encouraged where needed or appropriate, using appropriate knowledge, skills and materials to ensure that a successful and sympathetic re-use of the building is encouraged”.

Page 12, under “Energy efficiency”

Suggest add the following line: “When exploring the possibility of adding new features to existing buildings aimed at improving thermal performance or energy efficiency, consideration must be given to the whole life costings of such additions, including the carbon cost of manufacture, transport and installation, versus retention of the existing fabric with the energy embodied within it.”

Page 13, under “Building materials and performance”

Suggest adding the following text to the beginning of this section: “In many cases, the materials used to build the existing stock are no longer available. Many quarries have closed, leaving inadequate supplies of some types of stone and slate. It may be necessary in some cases to use reclaimed materials from demolished buildings to repair or replenish other local buildings to ensure that the correct materials are used. In terms of stone, petrographic analysis is recommended before embarking on such a task, so that materials with the correct properties are being recycled.”

Page 13 -under “Operation and maintenance”

Maintaining the existing traditional building stock is important to ensure their long term sustainability. We again suggest you add “*Local maintenance initiatives, which in some areas are already being developed, should be supported, to encourage homeowners and tenants to look after their properties*”.

Page 15, under “Focus”

Guidance for owners of traditionally constructed homes is available, free of charge from Historic Scotland’s TCRE Group, via a technical enquiry helpline and free “Inform” guide leaflets. The Inform guides are also available to download. More technical detail is available as Guides for Practitioners to aid contractors working on traditional buildings. Some mention of these, which are geared to enhancing the long term sustainability of the existing building stock, is needed.

Page 18 “References”

Suggest you add:

Guide for Practitioners no. 6, Conversion of Traditional Buildings: Application of the Scottish Building Standards (2007). Historic Scotland.

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