

THE ARCHITECTURAL HERITAGE SOCIETY OF SCOTLAND



RESPONSE TO NATIONAL PLANNING FRAMEWORK 2: DISCUSSION DRAFT

The Architectural Heritage Society of Scotland (AHSS) is an independent membership-based charity that works to promote the study and protection of Scotland's historic buildings. The AHSS welcomes the opportunity to comment on the above draft document as the Society has an interest in all documents and guidelines that have ramifications for historic buildings.

The AHSS recognises the importance of having a national planning document in place to guide Scotland's development for the next twenty plus years and we particularly welcome the genuine stakeholder engagement that has characterised the process of the preparation of the Second National Planning Framework for Scotland. The Society believes that the historic environment is crucial in defining Scotland's identity and has a real contribution to make to Scotland's economic, social and environmental wellbeing. This is recognised in the discussion draft but is not acknowledged in the summary documentation that has been produced.

The Society offers the following detailed comments:

- Para 52

In this paragraph, the percentage of owner-occupied houses is noted as 67%. Thus, the majority of houses are in private hands and it is these individual owners who will bear the responsibility for caring for them. There is a role for government in educating owners as to their responsibilities to maintain their properties, as effectively these individual owners are sharing responsibility for the public realm.

- Para 53, Para 100

The role of existing housing stock, much of it of traditional construction dating from before 1919 should be acknowledged. In addition, there is a real potential for the conversion of existing buildings to housing to deliver some of the additional houses that are required. Thus redundant industrial or other buildings can be retained and brought back into use.

- Para 73, Para 137

Construction waste represents a significant percentage (24%) of the total waste sent to landfill and consideration should therefore be given to how this can be reduced. The retention of existing buildings is obviously important in this regard.

- Para 79

The Society welcomes the recognition of Place as a key driver of change. However, we believe the physical built environment (within which historic buildings and landscapes have a key role to play) is important, as well as the social and cultural aspects of place that are already identified in the framework.

- Para 80

Historic buildings have a key role to play in defining the sense of place in the country, yet changes in the rural economy, especially in relation to farming are making many traditional buildings redundant. Care should be taken to retain and re-use traditional buildings of merit.

- Para 84, Para 145

The historic environment has a real contribution to make to achieving sustainable development. Retaining and re-using existing buildings is often much more energy efficient overall than demolishing them and replacing with new ones. With the addition of insulation and other adjustments, such as secondary glazing or the installation of efficient boilers, the thermal performance of existing buildings can be improved to acceptable levels.

- Para 87

Climate change being a requirement for the adaptation of buildings, not only to improve their thermal performance, but also to ensure they are able to withstand extremes of rainfall and wind which are also likely to be a feature of Scotland's future climate. Traditional construction is very well suited to Scotland's climate e.g. Scottish slate is thicker and smaller than others, therefore it is better able to withstand high winds.

- Para 124, Para 132

Consideration should be given to how micro-generation of energy can be incorporated in areas of high sensitivity, such as scenic areas, conservation areas, designed landscapes, on or near historic buildings etc. Detailed consideration needs to be made of the contribution that renewable energy can make in the context of single buildings - will this have a useful cumulative impact?

- Para 166

The Society welcomes the recognition in the framework of ensuring supplies of local materials. Stone, slate, lime, thatch and earth were often sourced locally in the construction of traditional buildings and this has helped to shape the rich variations we see in the architecture of Scotland. These subtle variations are key in defining the sense of place and to determining local distinctiveness. Developing the use of natural materials, will support the maintenance of the historic environment but can also serve to inform and inspire new buildings.