

Archived: 01 February 2021 14:15:52

From: [REDACTED]

Sent: Mon, 25 Jan 2021 17:09:52 +0000ARC

To: [localplan](#)

Subject: AHSS further Comments on Proposed Local Development Plan 2

Sensitivity: Normal

Attachments:

[REDACTED]

CAUTION: External Email

Dear Forward Planning,

Please find attached a further letter concerning the proposed Local Development Plan 2. This covers a number of topics, and should be read in conjunction with our earlier letter on Netherbarns of the 13th January.

Yours,

[REDACTED]





Speaking for Scotland's Buildings

25th January 2021

Forward Planning
Scottish Borders Council
Council Headquarters
Newtown St. Boswells
Melrose
TD6 0SA

RE: Local Development Plan 2 / Detailed submission

Thank you for the opportunity to comment on the proposed Local Development Plan 2. We have restricted our comments to areas of direct concern to the architectural heritage of the Scottish Borders and its future planning policy, and thus have no comment to make on many areas which may be of concern to some residents and other public bodies or amenity societies.

1) Netherbarns and other housing development

We have sent our objections to the inclusion of this site within the Local Development Plan (LDP) in a separate letter. It is not the place of the AHSS to propose development sites, but as a general policy, given the emphasis on environmental policies in PMD1, greenfield sites outwith traditional town boundaries such as this should be avoided, with sites nearer transport links sought. We do not consider the 19th century ribbon development of large villas in substantial grounds along this bank of the Tweed to set a precedent for modern housing development on other local greenfield sites.

Noting the lower-than-average incomes in the Borders (compared to Scotland as a whole), large new houses such as those proposed for Netherbarns do not meet local needs for affordable housing, and if they attract additional residents to the area, will increase rather than address overall housing needs.

Given its importance to the setting of Abbotsford, which in turn is a critical foundation of the entire 19th century rebirth of Scottish national identity, Netherbarns should be removed from the boundary of Galashiels, and added to the Special Landscape Area of the Tweed, Ettrick and Yarrow Confluences.

2) Shops and shop conversions

We note the expectation that in some Borders towns such as Hawick, changes in retail habits will realistically mean a reduction in core shopping areas. As this may result in the conversion of existing shopfronts to alternative uses, including residential, it would be helpful if the existing Shopfront guidance was updated to include specific guidance on what is appropriate for office, residential, or other conversions of existing retail premises. Some such conversions are particularly poor, and a coherent set of guidance would prove useful in conversations with prospective developers and consideration of subsequent planning applications.



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3) Policy EP7: Listed buildings

In **clause 1.2** we note that whereas in the previous LDP, specific heritage bodies and amenity societies were listed for consultation, they have been omitted here. This has the advantage that a list of those bodies can be maintained independently of the LDP. However a list of those bodies should be referred to in the LDP and made publicly available elsewhere in the interests of transparency. That list should indicate which heritage bodies and amenity societies (local and national) will be consulted for each category of listing, or for relevant conservation area cases. We note that, for example, HES consultation is presently required in law in many cases.

The AHSS has an independent process that identifies planning applications of concern, and so a decision on whether to consult the AHSS on alterations to listed buildings will not change the number of objections that the AHSS raises, but will determine whether they are submitted earlier through the consultation process, or over a longer period of time through the public application comment process. The decision on which bodies and societies to consult should be made in a timely and transparent manner.

In **clause 1.5**, given the number of planning applications which omit design statements despite existing guidance, we suggest emphasising their need here as well as in the policy itself.

In **Policy EP7** itself, the Enabling Development paragraph would be better moved lower, between the New Development and Demolition paragraphs, to reflect its status as a clause of less typical relevance than the criteria a) to d), which apply to all alterations and extensions. Additionally, conditions should be attached to such developments to ensure that repairs and renovation to the listed building are carried out in parallel or ahead of other enabling work, to avoid enabling development taking place without the promised work to the listed building occurring.

As written, the Enabling Development policy implies that positive economic, environmental and social benefits could be used to justify enabling development even where it is not the only means of retaining a listed building. An additional sentence would help at the end, such as: "These benefits alone would not justify enabling development where other means of retaining the Listed Building are possible."

4) Policy EP9: Conservation Areas

Here the final paragraph could echo some of the alterations made to Design Statements in EP7, perhaps "Design Statements are required for all applications for alterations, extensions, or for demolition and replacement, and should explain and illustrate the design principles and design concepts of the proposals."

5) Supplementary planning guidance: replacement windows and doors

The Scottish Borders remains the sole council in Scotland to still advocate the use of uPVC windows in Category C-listed buildings, and one of only two to advocate the use of uPVC on public elevations in conservation areas (the other being Inverclyde). Other councils have updated their guidance since Borders guidance was published in



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October 2015, and have opted to retain or consolidate their existing policies against the use of uPVC in listed buildings and visible (or often all) elevations of traditional buildings in conservation areas.

HES policy and guidance is specifically referenced in the proposed LDP policies, and notes that uPVC will rarely be acceptable in historic buildings. The reasons behind this are given both in Scottish Borders' own guidance, and elsewhere, but the practice of the policies as set out in Borders guidance are that uPVC in C-listed and conservation area properties is routinely permitted.

When this policy was developed, it may have seemed to reflect advances in uPVC imitations of traditional form, although we and HES do not agree that these reflect traditional proportions or detailing - even the best appear clumsy, with thick frames, and degrade the design quality of the historic environment.

However since then, it has become clear that the use and disposal of plastics is a significant environmental problem. In light of the continued emphasis on environmental issues in policy PMD1, and the development of advanced engineered wood with fifty year warranties, the continued promotion of uPVC is out of kilter with Scottish priorities on the environment, as well as on appropriate treatment of historic buildings.

uPVC is quoted by its manufacturers as having a twenty year life, with at most ten year guarantees offered on mechanical aspects of the windows (provided they are annually serviced, far from maintenance-free). Certain limited repairs are possible, but less so to complex designs such as imitation sash windows. Each time the windows are replaced, there is damage to the building, significant cost to owners, and a substantial amount of mixed waste. While uPVC can be recycled, it degrades and therefore can only be used for other uses, and never for new uPVC windows, which are made from new fossil fuel-derived plastic. There is very little market for used uPVC, and it is routinely landfilled or incinerated.

In contrast wood is easy to repair, and modern acetylated wood such as Accoya has an expected life of at least 70 years. Many people "upgrade" glazing to enhance thermal efficiency and save energy/heat, but Heriot-Watt's research on environmental impacts shows that the lifetime performance of uPVC is still significantly damaging after energy savings are taken into account. Timber however is carbon-negative. Replacement of any sort is often misguided: the Energy Savings Trust notes that a typical replacement of single-glazed sash windows saves just 0.5-1% of the total cost each year, so by the time uPVC needs replacement again, 80-90% of the original purchase price has never been recovered.

Given that uPVC is now understood to be overall harmful to the environment, as well as inferior in design quality, it is time to revise the supporting planning guidance to better reflect LDP policy PMD1, HES guidance, and national best practice.

Yours faithfully,

[Redacted signature]