

CHI/16/XXX: Technical Advice Note – The Repair and Replacement of Windows and Doors
Appendix 1 - Public Consultation Results Summary, Officer Response and Actions

Historic Environment Scotland

<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
Note the update relates to guidance on the council's position regarding window replacements on public and non-public elevations in conservation areas. These modifications are welcomed in offering further clarification regarding the council's position on this area.	Comments noted.	No action required.

HoHo Design

<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
Will the council uphold and legally implement new proposals?	If the TAN is agreed to be adopted as non-statutory guidance by Committee it will provide guidance and advice to owners, agents and applicants on what the Council expects regarding the repair	No action required.

	and replacement of windows and doors. The TAN will be a material consideration in determining planning applications and listed building consents for works of this nature.	
What do the council do about existing pv's etc windows in conservation areas (unauthorised replacement still continues)	Where there are existing consented PVCu windows on the front elevations of unlisted buildings within conservation areas the TAN outlines, that when these come to be replaced the Council will encourage the replacement of these with windows that are more suited to the period/age/style of the building. (Take words from TAN). Where unauthorised works take place the Council has the remit to take enforcement action. Enforcement is a discretionary power. Aberdeen City Council will decide if it is in the public interest to take enforcement action where planning control has been broken.	No action required.
Materials used on ' new construction ' of windows , should be a ' tight grained ' wood / material	Acknowledged and noted	Make modification to page 13. Text added stating, 'Timber is required to be tight grained'.
Personally there is not an old sash and case window that I have come across that can't be repaired / restored.	The replacement of existing windows is only permitted when the options of repair and refurbish have been fully investigated and repair is not possible. As is stated on page 68 in paragraph '3.2	No action required.

	Matching replacement windows' of Historic Environment Scotland's Guide for Practitioners 3: Conservation of Timber Sash and Case Windows, 'There will be circumstances where repair of an original window is not possible; this may be due to technical or economic reasons'.	
When is the council going to stop the installation of plastic ' parting bead ' on historic windows? Visible plastic ' draught proofing ' has no place in traditional windows. (there is a method of installing draught proofing without it being visible)	The TAN suggests there are a number of methods of draught proofing available and for interested parties to look to Historic Scotland's guidance notes for advice. The suitability of draught proofing is dependant on the style and make up of the window.	No action required.

Old Aberdeen Heritage Society		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
We welcome an update and many of the suggested alterations, some of which strengthen the Council's position with regard to the preservation and enhancement of Conservation Areas.	Comments noted.	No action required.
Section 5.1 – Listed Buildings	Agree.	Insert the text suggested.

<p>The omission of the final paragraph from the 2012 draft is ill-advised. This will be the main section consulted by owners of Listed Buildings. We suggest a slight re-wording to accord with other sections of the 2016 Draft. Suggested wording as follows: 'Original or historic windows, doors and doorways in Listed Buildings must be repaired and restored rather than replaced. Only in exceptional circumstances will replacement windows and doors be permitted, and these replacements must match the originals in all respects, in terms of appearance and material. Consent to replace original windows or doors on Listed Buildings will only be given when it can be demonstrated that they are beyond repair, and evidence of this will be required as part of any application, in the form of a Professional Survey, further details on which are provided in Appendix 1"</p>		
<p>Section 5.2 The last sentence of the 2012 TAN has been omitted, but it is important that at least the general point is included here, slightly reworded, perhaps:- "For buildings which are located within Conservation Areas (but are not Listed Buildings), the Council</p>	<p>Agree.</p>	<p>Insert the text suggested.</p>

<p>expects original windows and doors to be repaired and restored wherever possible". Without this last sentence, the section on "Conservation Areas" does not include a vital element - the advice that repair and restoration should always be prioritised, before even thinking of replacement.</p>		
<p>Section 6.1 – Retain, Restore, Repair</p> <p>The omission of most of paragraph 6 of the 2012 TAN is regrettable, but perhaps the most important part can be incorporated at the end of paragraph 1 in the proposed TAN by adding: "In contrast, some modern windows may need replacing after just 20 years."</p>	<p>The review of the TAN looked to keeping the guidance and advice concise. The sentence could be viewed as inflammatory. The life expectancy of fixture and fittings will be dependant on maintenance. Many modern windows may last more than 20 years.</p>	<p>No action required.</p>
<p>Paragraph 7 of the 2012 TAN has been omitted, and we would prefer to see this retained. It makes an important statement of the Council's position on this matter. An alternative would be to include our suggested wording for section 5.1 and 5.2.</p>	<p>Suggested working for section 5.1 and 5.2 will be included.</p>	<p>Section 5.1 and 5.2 text will be added.</p>
<p>Section 6.2 – Refurbish</p> <p>We would suggest that this first sentence is omitted entirely, as the next paragraph repeats the information.</p>	<p>Agree.</p>	<p>The text will be modified as suggested.</p>

We would also suggest that the heading "Energy Efficiency" be changed to "Energy Efficiency, Insulation and Security", in order to give a better indication of what the following paragraphs are about.		
<p>Section 6.3 – Reinstate Windows and Doors</p> <p>The first sentence of this section in the Draft TAN sits awkwardly with what follows, and it seems may have made its way there in error. It looks as if it should actually be the first sentence of Section 6.4 ("Replace Windows and Doors"), We therefore suggest that this first sentence in 6.3 is moved to the beginning of 6.4.</p> <p>We feel that it ought to be made clear that the reinstatement of doors will be specifically encouraged also. Perhaps a final sentence at the end of this paragraph could read: "The Council will also encourage the restoration of original types of doors"</p>	Agree.	Move the first sentence of section 6.3 to section 6.4. Add sentence outlining the reinstatement of doors is also encouraged.
<p>Section 6.4 – Replace Windows and Doors</p> <p>The first sentence of 6.3 surely belongs at the beginning of this section, and we suggest that it is transferred.</p>	Agree.	Move the first sentence of section 6.3 to section 6.4
Para 6.4 – Listed buildings and public	The text within the draft TAN notes,	No action required.

<p>elevations of unlisted buildings in Conservation Areas</p> <p>We would like to see included, those lines which we omitted from p.16 of the 2012 TAN, viz. "Consent for replacement windows on Listed Buildings or public elevations in a Conservation Area which reproduce the astragal pattern but open in a different manner will always be refused."</p>	<p>'replacement windows should replicate the historic design exactly in terms of materials, proportions, profiles and dimensions of frames and glazing bars/ astragals and method of opening and details'. As the above text outlines astragals and method of opening are to remain the same as the original the suggested text would not be required.</p>	
<p>Section 6.4 - Non-Public Elevations of Unlisted Buildings with Conservation Areas"</p> <p>With regard to the Scottish Government Reporter's Decision of 28th October 2015 (relating to 7 St. Machar Place). The reporter clearly has decided in favour of the principle that rear elevations of the building (7 St. Machar Place) and cottages make a contribution to the character of the Conservation Area, even when not seen from a public street. Given this principle, we would ask that the revised TAN should not allow the use of UPVC or other unsympathetic materials on these elevations, as this is bound to be detrimental to the character of the rear of a building and hence to the character of the</p>	<p>The Reporter's decision was thoroughly considered during the re-drafting of the TAN. When discussing the impact of replacement windows on non-public elevations of unlisted buildings the general principles of retain and repair over replacement are still applicable. The draft TAN makes it explicit that when replacing windows in non-public elevations the the context and setting of the building is required to be assessed to ensure proposals will have no detrimental impact on the character and appearance of the Conservation Area, and replacement windows must match the historic proportions, profile and dimensions of the original windows and avoid heavy frames.</p>	<p>No action required.</p>

<p>Conservation Area, as the rear elevation is also part of the Conservation Area.</p> <p>This would apply to doors as well as windows and give added protection to the many attractive houses throughout Aberdeen which have non-public elevations which are worthy of preservation while falling short of being listed.</p>	<p>The application under discussion with regard to the Reporters Report sought to alter the profile of the window, along with the material (and opening method – check). An alternative material and opening method are only sufficient on non-public elevations of unlisted buildings in conservation areas if all other criteria outlined are met.</p>	
<p>Section 6.4 - Replacement of existing non-original/historic windows on the public elevation of unlisted buildings within a Conservation Area</p> <p>We would suggest here that the wording be changed to: "the reinstatement of the original types and arrangements of windows will be required", rather than "always be encouraged".</p>	<p>The requirement to encourage the reinstatement of original types of windows and doors within this situation ensure there is a consistent approach taken throughout the TAN, as the encouragement is also sought for replacement of unsympathetic windows and doors as outlined in section 5.3.</p>	<p>No action required.</p>
<p>Section 12 – Glossary</p> <p>Article 4 Direction" - we suggest that after "an order made by Scottish Ministers' there should be inserted "or by local authorities with the approval of Scottish Ministers".</p> <p>definition of "Through Astragal" and</p>	<p>Agree.</p>	<p>Insert text suggested.</p> <p>Define through astragal and composite door within the glossary.</p>

"Composite Door" be included		
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Other considerations		
<i>Summary</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
Planning Development Management Committee (17 March) agreed to remove all Article 4 Directions on conservation areas and the Article 4 Direction on Kingswells. This then only leaves one Article 4 Direction in the City, which is on Burnbanks and that Direction remains unchanged.	The reference to the Kingswells Article 4 is required to be removed from the TAN	Remove reference to the Kingswells Article 4 Direction.