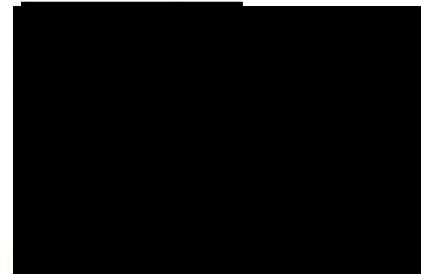


Historic Environment Scotland Àrainneachd Eachdraidheil Alba

Ms Donna Laing
Communities, Housing and Infrastructure
Aberdeen City Council
Business Hub 4, Ground Floor North
Marischal College
Broad Street
ABERDEEN
AB10 1AB



Our ref: LDP/A/2
Our Case ID: 201507338

17 March 2016

Dear Ms Laing

**Planning etc. (Scotland) Act 2006
Aberdeen City Council - Technical Advice Note: The Repair and Replacement of Windows and Doors**

Thank you for your correspondence of 19 February 2016 seeking our comments on the updated Technical Advice Note for the Repair and Replacement of Windows and Doors. The following comments are based on our statutory historic environment interests. That is scheduled monuments and their setting, category A listed buildings and their setting and gardens and designed landscapes and battlefields in their respective Inventories.

We note the updates to the existing Technical Advice Note relate to guidance on the council's position regarding window replacement on public and non-public elevations within conservation areas. These modifications are to be welcomed in offering further clarification regarding the council's position in this area. We therefore have no further comments to offer.

Should you wish to discuss any issue raised in this response please do not hesitate to contact me at the above details.

Yours sincerely

Andrew Stevenson
Senior Heritage Management Officer (SEA)

Donna Laing

From: DEREK (HO HO) [REDACTED]
Sent: 18 March 2016 01:07
To: Donna Laing
Subject: re: TAN

Follow Up Flag: Follow up
Flag Status: Flagged

hi donna , further to you letter on the proposed changes regarding traditional windows ,
(a) will the council uphold and legally implement new proposals ? ~ as they dont seem to , even on
existing policy !

(b) what do the council do about existing pv's etc windows in conservation areas (unauthorised
replacement still continues)!

(c) materials used on ' new construction ' of windows , should be a ' tight grained ' wood / material

(d) personally there is not an old sash and case window that i have come across that cant be
repaired / restored (so i question the need to replace windows at all !

(e) when is the council going to stop the installation of plastic ' parting bead ' on historic windows ? (as supplied by ' ventrola , aberdeen sash windows , etc) visable plastic ' draught proofing ' has no
place in traditional windows ! (there is a method of installing draught proofing without it being visable
!!!!)

you might want to have a word with douglas campbell , on arranging a screening to the ' planning
department ' of my window works at rubislaw den south , (he has portfolio of work on memory stick)

it includes all states of disrepair / decay , followed up with restoration methods / skills , etc

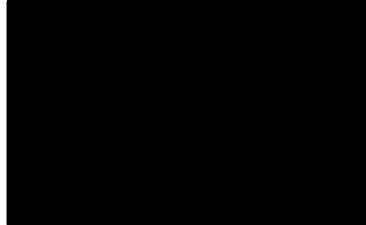
~ not sure what else i can say (plenty ?) . = is there anything else you might want me to address
on this matter ???

cheers for now derek [REDACTED]



OLD ABERDEEN HERITAGE SOCIETY

Donna Laing,
LDP Team,
Planning Department,
Aberdeen City Council,
Marischal College



19th March 2016

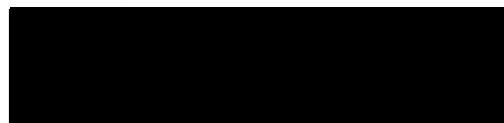
Dear Mrs. Laing,

TAN Consultation: The Repair and Replacement of Windows and Doors

Thank you for sending the Society a copy of the proposed revision of the above TAN. 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.

We enclose the Society's detailed response to this Consultation, which primarily seeks to draw attention to those parts of the revised TAN where, we believe, the Council's position has been weakened, or made less clear, by the omission of certain phrases or sentences which are included in the current TAN. We make suggestions as to how the wording could be altered to strengthen the Council's position, and we hope that such suggestions will be given full consideration.

Yours sincerely,



(Mrs). B. McPetrie
Planning Secretary

Old Aberdeen Heritage Society's comments on the Draft TAN

Section 5

5.1 - “Listed Buildings”

The omission of the final paragraph from the 2012 TAN in this new Draft is, we believe, ill-advised. A statement of the Council’s longstanding policy on this should not be dropped. It is important that this imperative remains in this section, which will be the main section consulted by owners of Listed Buildings. This will put the Council’s priorities in context.

We suggest a slight re-wording (to accord with other sections of the 2016 Draft) 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”

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 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. We are aware that this advice is given under 6.3, but only in a more general context. A householder looking for advice on the Council’s guidance on Conservation Areas in particular needs to find it in that specific section.

Section 6

6.1 - “Retain, Restore, Repair”

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.”

Paragraph 7 of the 2012 TAN has been omitted, and we would prefer to see this retained, but if there is a shortage of space, this could be acceptable as long as the similar paragraph (minus the last sentence) is retained in Section 5.2, as we have requested, under “Listed Buildings”, and as long as the final sentence (suitably re-worded, if necessary) is retained at the end of Section 5.2, on “Conservation Areas”, as we request under 5.2.

The content of this paragraph must not be omitted entirely from the guidance document. It makes an important statement of the Council's position on this matter, and without this, it may be more difficult for the Council to refuse replacement with new timber, when the original is either perfectly good or able to be repaired. It is our view that these points need to be explicitly stated, to strengthen the Council's position in general.

6.2 - "Refurbish"

The first sentence of this section in the Draft TAN unfortunately makes no sense, because it refers back to a sentence which has been removed .It refers to “these same benefits”, which were enumerated in the missing sentence.

We would suggest that this first sentence is omitted entirely, as the next paragraph repeats the information.

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.

6.3 “Reinstate Windows and Doors”

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”), where it would make sense, in introducing the issue of replacement, by giving a warning/reminder about when replacement will not be allowed.

We therefore suggest that this first sentence in 6.3 is moved to the beginning of 6.4.

For the rest of 6.3, it should be noted that the emphasis is really only on the reinstatement of windows. 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”

6.4 “Replace Windows and Doors”

As we note above, the first sentence of 6.3 surely belongs at the beginning of this section, and we suggest that it is transferred.

6.4 - “Listed Buildings and Public Elevations of Unlisted Buildings in Conservation Areas

At the end of this section, we would like to see included, those lines which were 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.”

This is an important Council policy which must not be lost in the updating of this document.

6.4 “Non-Public Elevations of Unlisted Buildings within Conservation Areas”

The Scottish Government Reporter’s Decision of 28th October 2015 (relating to 7 St. Machar Place), which has prompted the update of this TAN, includes two relevant statements:-

“The rear windows make their own valuable contribution to the character” (of the cottage)

and

“I consider that these cottages have been included in the conservation area not simply for their frontages, but as a whole, and the rear elevations make their own contribution to the character of the area.”

The Reporter clearly has decided in favour of the principle that rear elevations of buildings do 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 Conservation Area, as the rear elevation is also part of the Conservation Area.

This would apply to doors as well as windows, and would 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.

6.4 “Replacement of existing non-original/historic windows on the public elevation of unlisted buildings within a Conservation Area”

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”.

This would lead to considerable improvements in the character of Conservation Areas, by way of restoring the types of windows which were originally designed for a house, and so enhancing the amenity of each conservation area. If a householder is intending to replace unsympathetic windows, surely the new standards should apply, in order to promote the enhancement of Conservation Areas across the City.

12 - Glossary

Under “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”. This, we believe, would be a more accurate statement of the situation.

We also suggest that a definition of “Through Astragal” be included, as well as just “Astragal”, as it is probably not clear to a layman what this means.

Lastly, might we suggest that a definition of “Composite Door” be included, as this also needs explaining.