



BROUGHTY FERRY COMMUNITY COUNCIL

Dr.D.S.Hewick,

Scottish Government,
Planning Division.,
2H Victoria Quay,
Edinburgh EH6 6QQ

Dear Sir/Madam,

Consultation on Planning and the Historic Environment

We realise that SPP 23 has rather a limited aim in that it is mainly a tidying up exercise bringing it into line with the 2006 planning act and merging NPPGs 5 and 18. In this respect it is rather disappointing. We would welcome in the future a rather more rigorous reassessment of how the planning system performs with reference to the historic environment. We feel that Scotland has lagged behind the rest of the UK in this sort of re-appraisal.

We would suggest some of the following could be addressed.

1. With listed buildings, the local planning authority has an important role in administering regulations. A major deficiency occurs when listed buildings are in the care of the local authority. If such council buildings are being neglected or at risk (it is not unknown for this to occur), who should be responsible for serving repairs notices/enforcement orders? Do councils serve such things on themselves or can Historic Scotland do this? There is a lack of public confidence in this matter.
2. Conservation areas have been in existence for over 30 years. It would be useful to assess how the system has worked during this time. Have designated areas improved, stayed the same or deteriorated. Have previously designated conservation areas had to reduce in size or be de-designated. Has this been a result of deterioration in the areas concerned? We note that Dundee City Council is proposing to introduce a photographic record (updated every 5y) to assess how well conservation areas have been managed. This should become a statutory requirement.
3. Conservation areas should be given a greater degree of protection. A simple way of starting on this would be to modify the wording in **MODEL POLICY 2** from 'preserve OR enhance' to 'preserve AND enhance'. This would reduce the likelihood of so-called 'neutral' developments being built in conservation areas. The quality of infill development has often been disappointing. It could be interpreted that in a historic conservation area modern looking buildings are by definition of 'bad design' because they look out of place.
4. Other more detailed matters which should be assessed regarding conservation matters are as follows
 - a) Should the use of plastic for window frames and doors etc be banned on aesthetic and sustainability grounds?
 - b) A clear definition of what constitutes demolition should be available
 - c) The volume threshold of allowable demolition should be decreased
 - d) There is an anomaly regarding the requirement for referral to Historic Scotland concerning demolition consent. Demolition of a whole building over the volume threshold requires referral. The same volume of a partial demolition of a larger building does not. The volume threshold should be the same for complete or partial demolition.

Yours faithfully,

D.S. Hewick [Planning Secretary, Broughty Ferry Community Council]