

Argyll and Bute Council Historic Environment Strategy 2015 – 2020

Consultation Response from Rhu and Shandon Community Council, 11 September 2015

(Advised by R&S CC member Fiona Baker, Director, Firat Archaeological Services Ltd)

General Comments

- Rhu and Shandon Community Council welcome the A&B C Historic Environment Strategy 2015-2020 (hereafter referred to as HES).
- The HES is largely focussed on the built environment rather than the broader historic environment. The full scope of what constitutes the historic environment has not been fully integrated into the HES.
- Insufficient attention is given to archaeological sites, both scheduled ancient monuments and unscheduled archaeological sites, (which make up the majority of archaeological sites and monuments) and historic landscapes and setting.
- The HES refers to Historic Scotland and the Royal Commission on Ancient and Historic Monuments throughout and these bodies will be merged as of 1 October 2015 to form Historic Environment Scotland. Historic Environment Scotland has newly defined responsibilities as detailed in The Town and Country Planning (Historic Environment Scotland) Amendment Regulations 2015, (and see *Historic Environment Circular 1*). The HES should be amended to reflect this change in care and management of the historic environment in Scotland as at present the HES will be out of date as of 1 October 2015. (i.e. all references to Historic Scotland and RCAHMS should be replaced with Historic Environment Scotland)
- The West of Scotland Archaeology Service, who maintain the Historic Environment Record for Argyll and Bute and advise the planning authority on archaeology and planning matters, are not accorded significant recognition or weight in the HES.
- Designated sites represent a small fraction of our historic environment and cultural heritage assets. This is a key point that must be addressed by the HES.
- We are very concerned that there is no guarantee from Argyll and Bute Council that the West of Scotland Archaeology Service will be maintained and funded (in partnership with other Councils and the Loch Lomond and The Trossachs National Park).
- We are concerned that that there is no guarantee or commitment that Argyll and Bute will continue to contribute to the funding and maintenance of the Historic Environment Record for Argyll and Bute. This is maintained and managed by the West of Scotland Archaeology Service and is the **key resource** for managing Argyll and Bute's historic environment in the planning system and providing advice that will feed into all eight of the stated key objectives.
- We are concerned that this document may be fine words but will not actually be delivered. It promotes a number of policies and strategies for the historic environment which oppose what the Council is actually doing at present. We hope it signals a new approach in real terms to the care and disposal of significant buildings of historic value.
- We welcome the aims and aspirations of Argyll and Bute in managing and caring for our cultural heritage. However, we are very concerned that there are insufficient resources allocated or available within the Council to actually achieve the stated aims.

Consultation on Argyll and Bute Council Historic Environment Strategy 2015-2020

- The creation of an Historic Environment Officer post seems essential in order to deliver, promote and integrate into overall Council policies and strategies the aspirations of the HES.

Specific Comments

Introduction

- **Foreword by Cllr Kinniburgh** – lists heritage assets but does not mention Historic Marine Protected areas or archaeological sites only Scheduled (Ancient) Monuments. This sets the tone of the whole document in that it does not give sufficient significance to unscheduled archaeological sites.
- **How is A&B C involved in Heritage?** – fails to list Historic Environment Record maintained for A&B C by the West of Scotland Archaeology Service, Scottish Historic Environment Policy (SHEP 2011), Local Plan Supplementary Guidance on Historic Environment matters (SG LDP ENV 15,16,17,18,19,20 and 21), Historic Marine Protected Areas, The Town and Country Planning (Historic Environment Scotland) Amendment Regulations 2015, PAN 2/2011, SPP 23. Focus is on buildings and conservation areas.

Key Objective 1

To provide a strategic context and holistic approach and vision for Argyll and Bute Council's heritage activity.

- 1.1 – Perhaps the best qualified elected member rather than the current Council's Policy Lead for PPSL would be more appropriate. While this is a political appointment it would be sensible to appoint an elected member who has direct and relevant knowledge of the historic environment (if there is one).
- 1.1 / 1.2 – Are WoSAS (part funded by A&B C) a main Council service or external partner? If they are an external partner they should be at the top of the list of external organisations / equal to Historic Environment Scotland. Planning and development have the biggest impact on the Council's duty to protect the historic environment and accordingly the organisations that deal with planning matters (WoSAS and HES) are the key external partners.
- 1.2 – Historic Scotland ceases to exist as of 1 October 2015 when it is merged with Royal Commission on Ancient and Historic Monuments of Scotland (RCAHMS) and becomes Historic Environment Scotland.
- Key outcomes – good.

Key Objective 2

To highlight the wider contribution our historic environment can play in the development of the economy, creating and maintaining a strong sense of place, social wellbeing, sustainability and climate change.

- 2.1 – Historic Scotland again – out of date by the time this Strategy is finalised and published.
- 2.1 – last line indirect (typo)

Consultation on Argyll and Bute Council Historic Environment Strategy 2015-2020

- 2.1 - It is a pity these aspirations and observations were not applied to the proposed community purchase of A&B C owned Castle Toward.
- 2.1 - P21 paragraph 1 – ‘site seeing’ sightseeing
- 2.1 - AISTP - if you ‘Google’ AISTP the last activity seems to be minutes from 2012 on Visit Scotland’s website (and to have been established in 2009 – 2010 not 2012 as the HES states). There is no AISTP visitor friendly web page promoting tourism in A&B. The leading provider of online information on tourism in A&B is the part A&B C funded Argyll and the Isle Tourism Co-operative (Explore Argyll). While there is no doubt a connection between AITC and AISTP it would seem sensible for the established market leader AITC, who organise an annual tourism summit, to continue to be the front end for visitors rather than wasting money trying to supplant it with another organisation that seems to have done nothing since 2012. Investing in AITC appears a more sensible option.
- 2.1 - Heritage / culture / arts trails promotion online – good, this could be further developed by AITC/ Explore Argyll who already have several excellent guides.
- 2.1 - Recognition of special towns and places / regeneration through heritage– several A&B towns and villages are already designated as Conservation Areas in recognition of their special qualities, e.g. Rhu. However A&B C has so far failed in its duty to actually carry out conservation area appraisals and in Rhu we have found that trying to obtain support from A&B C to progress this in our own community has been very difficult as the Built Heritage Conservation Officer is, not surprisingly, unable to cope single handed with all of Argyll and Bute. While R&S CC applaud the aspirations of the HES we are dubious that it can be delivered without further staff resources within the Council (see below). We are concerned that the HES will be fine words and no actual action and delivery due to insufficient staff resources.
- 2.2 – Historic Scotland ceases to exist in 3 weeks time so they certainly won’t be awarding any grants – revise whole HES to reflect current organisation of historic environment management in Scotland, i.e. Historic Environment Scotland.
- 2.2 – support of local organisations and projects by A&B C Social Enterprise Team including assistance with securing funding is welcome.
- 2.2 – Third Sector Asset Transfer – current experience indicates the Council prefers to sell assets for economic gain and Third Sector requests for asset transfer are unlikely to be entertained.
- 2.2 – We agree it is environmentally sustainable to restore / convert / reuse historic buildings rather than demolish them and build new ones. However, buildings owned by the Council should not be left unused and neglected for years so that the restoration costs increase exponentially (i.e. Clyde Street School). Also the Council should seek new uses for historic buildings rather than simply place them on the open market to the highest bidder (e.g. Helensburgh Municipal Buildings, Helensburgh Registry Office (Marriage Rooms)). These structures are part of the historic fabric of Helensburgh (and could have been offered for Third Sector Asset Transfer e.g. Museum, Heritage Trust, Helensburgh Heroes) that this HES champions as worthy of protection, preservation and enhancement. Not to mention the Castle Toward debacle.
- 2.2 – We are pleased to see the Council will promote and provide training in energy efficiency and renewable technologies in historic / traditional buildings.
- 2.3 – Successful regeneration works aimed at encouraging civic pride and community engagement – following the disruption and loss of trade caused by CHORD in Helensburgh and the widely despised head ‘sculpture’ that now adorns the otherwise externally splendid new Council Offices at Clyde Street School we must urge the

Consultation on Argyll and Bute Council Historic Environment Strategy 2015-2020

Council to engage in meaningful consultations that actually take account of the expressed views of the local residents.

- 2.3 – core path networks. Locally, new paths (e.g. the Three Lochs Way) have been created without any archaeological assessment or respect for the historic environment and have caused damage to significant archaeological features. The support of A&B C / ACT in creating new path and cycle networks must ensure there is the joined-up thinking that the HES seeks to promote and the first of the Key Outcomes is achieved.

Key Objective 3

Identify the key challenges and opportunities facing Argyll and Bute’s historic environment and make recommendations as to how these might be addressed.

- 3.2 Appreciation and Perception – *‘support of the people of Argyll and Bute in engagement with heritage, participating in local decision making and developing a sense of local ownership’*. This *‘key purpose’* of the HES would be greatly assisted by the retention of prominent local buildings (especially Listed Buildings and ones of significant historic interest and purpose to a community) currently in Council ownership or by the Council ensuring either Third Sector Asset Transfer or sale for appropriate socially beneficial re-use. (e.g. Castle Toward, Helensburgh Municipal Buildings, Helensburgh Registry Office, Blairvadach).
- The Council must lead by example and maintain the historic buildings in its own estate and in particular must find solutions for buildings in Council ownership that are on the Buildings at Risk register.
- 3.3 – CARS/THI – no explanation of abbreviations.
- 3.3 – We support the development of training in traditional building skills at Argyll Construction College in conjunction with Historic Environment Scotland.

Key Objective 4

To identify the key challenges and opportunities facing the Council’s existing heritage assets and make recommendations as to how these might be addressed and prioritised.

- Typo - councils / Council’s in contents section.
- We have also commented on the responsibilities of A&B C in comments on Key Objectives 1-3.
- 4.1 – good aims and objectives.
- We are pleased to note that the HES will be integrated into Strategic and Corporate Asset Management.
- We suggest that training in management of historic environment assets is provided to members of the Strategic Asset Management Board and appropriate Council officers. Historic Environment Scotland should be asked to co-ordinate and deliver this.
- Permitted Development – (utility companies) often damages or destroys buried archaeological remains. In the case of Council Permitted Development the Council’s archaeological service WOSAS should be consulted in advance in addition to the planning department.

Consultation on Argyll and Bute Council Historic Environment Strategy 2015-2020

- We agree that greater internal awareness of the historic environment is required by Council departments and welcome efforts to improve this.
- We strongly agree that Conservation Area Appraisals (CAA) and Management Plans – and would like to add Key Environmental Features to this list – should be engaged with by all council staff and used in decision making. We also support the suggestion that council services are better engaged in the preparation of these documents. Rhu and Shandon CC would warmly welcome engagement with council officers on preparation of a CAA for Rhu.
- Sharepoint Historic Environment Guidance Library – what is this? Internal A&B C library or online for public access (latter recommended). Page 67 states it will be internal.
- Ensuring assets are fit for purpose, used efficiently and maintained on a sustainable basis and that investment is matched in terms of service needs – we support this aim of the Corporate Asset Management Strategy.
- We welcome efforts to increase carbon reduction. In particular we support adaptation and re-use of historic and traditional buildings which is always preferable to demolition. We would hope to see this approach applied to planning decisions concerning the private sector as well as to the Council estate.
- Maintenance – we agree and support everything in this section particularly the statements that Council owned properties must be maintained in a good state of repair even if not in use; that re-use is better than no use and the condition of council assets impact on communities' quality of place. The Clock Lodge at Lochgilphead illustrated in the report is an example of where this new HES approach would have been usefully applied as the building fell into a dreadful state of disrepair before being disposed of by the Council in an excellent Third Sector – Private Sector arrangement. We support pragmatic arrangements of this kind.
- Disposal and rationalisation – important that a joined-up GIS based database is developed as soon as possible to ensure improved management of Council assets and meeting the aspiration of the HES.
- The unscheduled and un-listed assets which are registered in the Historic Environment Record for Argyll and Bute maintained by the West of Scotland Archaeology Service / in Canmore / National Monument Record of Scotland (formerly RCAHMS now merged with Historic Scotland as Historic Environment Scotland) must also be integrated into the asset management strategies and responses.
- We welcome the Bute pilot study and a better, more holistic assessment of asset management and decision making on disposal of assets in the future.
- We strongly support the Third Sector Asset Transfer process. While we appreciate the Council must manage its finances carefully and responsibly and always try to obtain best value for money we believe a higher priority for councils is maintaining, supporting and protecting communities and quality of life (and the attendant health, social and economic benefits this brings). If local community groups wish to acquire an asset the Council wishes to dispose of and they have a good business case for the long term sustainability of the asset preference should be given to asset transfer to the third sector over and above financial gain / income from sale to the Council.
- Best Value, spend early save later – we support his approach to maintaining Council assets. However, the difficult cases outlined in the last paragraph of this section must not be ignored in favour of easier cases and community led approaches in particular should be supported and encouraged by the Council (e.g. Castle Toward)
- Key outcomes of Key Objective 4 – good.

Key Objective 5

To devise a mechanism for prioritising future built heritage projects around Argyll and Bute and to identify council and other external funding streams to enable successful delivery.

- We welcome the Council's proposals to review and prioritise built heritage projects, to work more closely with partners, set up a strategic project / heritage team and adopt an holistic approach to funding.
- 5.1 – we agree with these criteria but unscheduled / undesignated historic environment and cultural heritage assets are missing and should be included on this list (consult with WOSAS). There are numerous bridges, farm buildings and houses that are not designated but are of significant cultural heritage value. Designated sites represent a small fraction of our historic environment and cultural heritage assets. This is a key point that must be addressed by the HES.
- A prioritisation methodology using objective criteria is a sensible approach. However, as with all things there will be exceptional cases that do not fit all the tick boxes and a pragmatic and flexible approach to the implementation of the resulting management plan is recommended.
- 5.2 – we agree with these points and welcome support in terms of council officer resources. In particular we think a designated council officer to assist community groups with Heritage Lottery and other funding applications and who represents the council and is aware of what resources the council can contribute would be an important and high value contribution to achieving the aspirations of the HES (e.g. current Social Enterprise officer, Argyll Voluntary Action).
- 5.3 – Regarding the Buildings at Risk register we warmly welcome a more pro-active approach by A&B C in trying to resolve the various issues faced by these buildings. and to try and find new uses for them.
- Key outcomes of Objective 5 – good

Key Objective 6

To promote access to Argyll and Bute's heritage assets and extend the diversity of heritage activity.

- We are pleased to note the 19,000 assets of historical value that are not designated assets are recognised and acknowledged in the HES as being of significant value.
- We are pleased to note that Kilmartin Glen is recognised as one of the most significant archaeological landscapes in Europe. We further note it may be a suitable candidate for inclusion on the list of World Heritage Sites and would encourage the Council to support any bid for WHS status that may be put forward.
- We welcome the proposed research study and development plan and resulting action plan for Argyll and Bute's seaside towns.

Consultation on Argyll and Bute Council Historic Environment Strategy 2015-2020

- The Royal Commission on Ancient and Historic Monuments of Scotland ceases to exist on 1 October 2015 and merges with Historic Scotland to become Historic Environment Scotland.
- We note that the HES does not suggest or promote any particular measures to encourage appreciation and preservation of the undesignated archaeological sites including industrial heritage sites other than to say *'The Council will look to engage with RCAHMS and interested groups in bringing forward suitable projects in Argyll and Bute'*. This section of the HES is very weak and does not appear to have given much consideration to how the Council will promote access and extend diversity of heritage activity. It passes the responsibility to Historic Environment Scotland through the Scotland's Urban Past and volunteering.
- 6.2 The identification of relevant HLF grants is a useful table but as noted above a dedicated council officer to assist community groups with grant applications would be a good value investment by the Council. The salary for such an officer would be dwarfed by the investment in A&B C's historic environment by HLF and other grant awards. (e.g Hermitage Park, Helensburgh - £2 million HLF grant (pending) and other grants and local fundraising for the cost to the council of one project officer's salary and, in this case as it is a Council owned asset, partnership funding by A&B C).
- The Scottish History and Archaeology Festival is missing from the list of national events.
- A&B C could be much more actively engaged in promoting A&B's archaeological past through involvement in the national events and festivals noted in 6.2. The creation of an Historic Environment Officer post seems essential in order to deliver, promote and integrate into overall Council policies and strategies the aspirations of the HES.
- 6.2 – We support the HES approach to support of volunteers, young people and connectivity with the arts.
- 6.2 Marketing – we welcome a focussed marketing strategy for the historic environment in Argyll and Bute. We support the Strategic Action Plan for Culture, Heritage and the Arts in Argyll and the Cultural Assembly. Comments on AISTP and AITC above under Section 2.
- We welcome the suggested measures to improve accessibility and the key outcomes.
- Case Study: Coastal town regeneration challenges and opportunities – we welcome the overview of examples from elsewhere in Britain and that A&B C recognise the economic value and significance of the historic environment and aspire to achieve similar success stories in Argyll and Bute.

Key Objective 7

To promote positive development management and intervention for Argyll and Bute's historic environment.

- Paragraphs 1 and 2– we agree but feel that in addition to the proposed Council Heritage Champion a salaried Historic Environment Officer is required in order to co-ordinate and ensure the successful delivery of the HES.
- This key objective is focussed almost entirely on the built heritage. With other historic environment assets listed only as bullet points under Development Management.
- Development management should consider not only setting but also direct physical impact (e.g. excavation in archaeologically sensitive areas).

Consultation response from Rhu and Shandon Community Council

Consultation on Argyll and Bute Council Historic Environment Strategy 2015-2020

- The role of the West of Scotland Archaeology Service in monitoring and advising appropriate mitigation or consent / refusal for planning applications affecting archaeological resources is not mentioned. This is a major shortcoming.
- We are very concerned that there is no stated commitment in the HES to continue to fund and maintain the Historic Environment Record for Argyll and Bute and to continue to retain the West of Scotland Archaeology Service as the Authority's archaeological advisors on archaeology and planning matters. These services are absolutely vital to successful management of the historic environment in Argyll and Bute. The HES is unacceptable until this guarantee has been included in the HES.
- We support and welcome the increased responsibilities of the Conservation Officer (and believe additional staffing will be required to achieve these increased responsibilities).
- We welcome further training for council officers in vernacular architecture, traditional construction techniques and conservation building repair and increasing capacity within the planning service.
- The HES has not recognised that Historic Environment Scotland (the merged HS and RCAHMS body as of 1 October 2015) is a statutory consultee on **all** listed buildings and conservation area consents (see The Planning (Listed Building Consent and Conservation Area Consent Procedure) (Scotland) Regulations 2015). This includes B Listed buildings. While a Joint Working Agreement may be agreed between Historic Environment Scotland and Argyll and Bute Council the local authority will have to demonstrate it has the capacity to determine applications for works to listed buildings but the local authority will still be required to consult Historic Environment Scotland even if a Joint Working Agreement is in place.
- Conservation Areas – Rhu and Shandon CC are actively seeking to prepare a CAA for the Rhu Conservation Area. Our proposals included the possibility of developing a Toolkit (as outlined in the HES) with the Scottish Civic Trust in partnership with A&B C. We have waited for months, indeed over a year, for a response and input from the Council's Conservation Officer. We welcome the proposals noted in the Conservation Areas section of the HES but are doubtful that based on past performance these can actually be delivered without additional staffing and support for the Council's Conservation Officer. One person simply cannot deal with all of Argyll and Bute!
- We welcome the recognition that undesignated buildings are also of significance and the supplementary guidance SG LDP ENV 21 Protection and Enhancement of Buildings.
- The Built Heritage Conservation Officer's role in planning – we welcome the increased training of development management / planning officers in conservation matters. However, we think it is unlikely that this additional training will deliver the appropriate level of expertise. We note that temporary staffing support may be offered to the Conservation Officer. We suggest that in order to deliver the HES successfully A&B C must invest in at least one additional staff position of an Historic Environment Officer who would work closely with the Conservation Officer but whose remit would extend to the whole HES, not just standing buildings, and the actual, practical delivery of the HES.
- Historic Scotland will cease to exist in a few weeks time. Historic Environment Scotland will take on responsibility for Scheduled Ancient Monuments, Marine Protection Areas and all other designated assets (Listed buildings, battlefields, gardens and designed landscapes, conservation areas etc). This is the first mention of

Historic Environment Scotland in the whole document! The A&B C HES requires complete revision to reflect the change to Historic Environment Scotland and their role and responsibilities or else it will be out of date as soon as it is adopted and published.

- 7.2 Buildings at Risk – we welcome A&B C’s recognition that there are buildings that can be considered at risk that are not on the Buildings at Risk Register. We welcome the Council’s proposed review of how to collate and a manage building at risk data for Argyll and Bute and to utilise GIS based mapping. It is noted that the creation of a Buildings at Risk register specific to Argyll and Bute would require initial resourcing and ongoing management and monitoring. We welcome the suggestion that how to achieve the best solution of registering buildings, monitoring them and maintaining an up to date register is investigated. We believe that the Scotland wide Buildings at Risk Register is the key central location for all buildings at risk data for Scotland and that Argyll and Bute information is extracted from this for use directly by the Council and partnership working is pursued in order to keep the list up to date.
- 7.3 Monitoring and Enforcement – We welcome the proposal for early, positive and proactive intervention and the establishment of Area Property Action Groups.
- 7.4 Building Standards - we support the Council’s efforts to address dangerous buildings.
- We support the retention and reuse of buildings.
- We support the proposed Building Standards policy on Historic Buildings and commitment to CPD training of council officers in matters relating to traditional buildings meeting modern building regulations, traditional construction methods, energy efficiently and fire prevention and internal training of A&B C officers by Historic Environment Scotland.
- Key outcomes – good.

Key Objective 8

To prepare a priority programme of actions for delivery involving the Council the local community, property owners, heritage organisations, other agencies and funding partners.

- The delivery of Key Objectives 1 to 7 are detailed in this section. Comments on Sections 1 to 7 deliberately did not refer to Key Objective 8 – how the HES is going to be achieved and delivered. Most issues have been covered in the comments on the individual Key Objectives.
- Key objective 7 – we note that the Council will work with WoSAS to develop further the unlisted asset recording in the region through their existing Historic Environment Record. This is not a strong enough commitment to retaining the services of WoSAS in maintaining the HER and their input to development planning services. The role of WoSAS in the HES needs to be given greater recognition and strengthened.
- The work load allocated to the Built Conservation Officer (and probably other officers) on top of what they do already is far too onerous and another member of staff is required to deliver this HES successfully.