

REPORT ON THE CONSULTATION RESPONSES
TO
MANAGING CHANGE IN THE HISTORIC ENVIRONMENT -
WINDOWS

CONSULTATION REPORT
HERITAGE DIRECTORATE
JULY 2017



HISTORIC
ENVIRONMENT
SCOTLAND

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1 ACKNOWLEDGEMENTS

Historic Environment Scotland would like to thank all those who responded to this consultation document by providing written comments.

2 SUMMARY

Historic Environment Scotland (HES) is pleased to announce the outcome of the consultation on its revised guidance note *Managing Change in the Historic Environment – Windows*. The previous Windows Guidance note was published in 2010.

The aims of the guidance note are to identify the key issues that can arise from proposals to alter or replace windows in historic buildings. This note, like others in the Managing Change series, is intended to offer clear, consistent, and principles-based advice to professionals, developers, and applicants.

Between 27 February and 28 April 2017 HES ran a public consultation to seek views on a draft of *Managing Change – Windows*, inviting our key stakeholders and other relevant bodies to provide comments. 31 responses in total were received, of which 28 respondents replied to the consultation questionnaire; the other 3 sent general comments on the text. As a result of the consultation *Managing Change – Windows* was redrafted into the final form which has now been published on the HES website.

This report summarises the responses to the consultation and outlines how these comments were taken into account during the process of redrafting the note into its final form.

3 BACKGROUND AND INTRODUCTION

3.1 Managing Change Guidance Notes

The Scottish Government's strategy for the historic environment is set out in 'Our Place in Time: The Historic Environment Strategy for Scotland'. Policies on the historic environment are set out in Scottish Planning Policy (SPP). The Historic Environment Scotland Policy Statement sets out how HES fulfils its regulatory and advisory roles and how it expects others to interpret and implement SPP.

Managing Change is a series of non-statutory guidance notes on best practice for managing change in the historic environment. At the time of writing there are over twenty Managing Change notes, covering a wide range of subjects.

Each Managing Change guidance note looks at a different theme in terms of:

- The key issues that might arise.
- How best to deal with these issues.
- The reasons behind our advice.

Managing Change guidance notes are available to download from Historic Environment Scotland's website.

3.2 Purpose of Guidance and Consultation

The guidance note, *Managing Change in the Historic Environment – Windows* is intended to help owners, agents and decision-makers identify the importance of historic windows, how they contribute to the special interest of a building, and to set out the principles that should be applied in proposals for their repair, alteration and replacement.

The purpose of the consultation was to seek the views of members of the public on the wording and scope of the document. We were particularly keen to hear from those who have experience in applying for permission to replace windows (whether as an applicant or agent) in listed buildings or within conservation areas and those in local authorities involved in determining applications.

3.3 Consultation Methodology

A consultation questionnaire was made available online via Survey Monkey and by e-mail through Heritage Directorate's stakeholder engagement e-mail contact list. A copy of the questionnaire is included as Annex 1.

The consultation was sent by e-mail to HES's key stakeholders, government departments, public bodies, and local authorities. Specific organisations, charities, amenity bodies, and private sector companies which it was felt were likely to have a particular interest in the subject matter were targeted. The consultation was not advertised more widely but was available on HES's website. A total of 305 individuals and organisations were contacted regarding the consultation. A list of consulted organisations is appended as Annex 2.

The questionnaire began with a short preamble outlining the purpose of the consultation. The following seven questions were asked:

1. Does this document provide the guidance you would expect?
2. Does the document leave out anything that should be included?
3. Does the document include anything you think is unnecessary?
4. Do you have any specific examples you would like us to use to help illustrate any of the points made in the document?
5. Our managing change guidance notes refer to best practice for all historic buildings. This represents our wider role as a lead body for the historic environment. Do you agree with this approach, or would it be useful to provide more specific guidance on statutory consent procedures?
6. As we continue to develop our suite of guidance are there topic areas you would like to see covered?
7. Additional comments.

The first six questions had a yes/no option as well as a free text field whilst the last question was free text only.

Further questions regarding how consultees' responses could be made publically available and a privacy notice followed. This consultation report accords with the privacy notice and adheres to the wishes of the respondents.

4 RESPONSES & FINDINGS

4.1 Introduction

This section gives basic information on the nature of the responses and their content. It begins with a breakdown of the responses, followed by a summary of the findings to each question. Section 5 summarises the key issues highlighted by the consultation and outlines HES's responses to them.

4.2 Breakdown of Responses

31 responses were received. Of these 28 replied to the questionnaire (26 through Survey Monkey) and 4 provided comments on the text. The majority of respondents did not answer every question, but did provide written comments to the questions they answered (some very substantial). Two of the Survey Monkey questionnaires were so incomplete that they contain no useful information.

A breakdown of the responses by sector/interest group is given below:

Respondent Type	Number	% of respondents	Comments
Local Authority	13	42	From 11 Council areas
Professional Body	2	6	RIAS and GGF

Member of Public	4	13	
Private sector company	1	3	
Anonymous	11	36	Some appear to have come from planning officers.

4.3 Summary Responses by Question

89% of the questionnaire respondents included written comments. The responses to 'yes/no' questions and related comments are summarised below.

Some respondents included comments that are not directly related to the question they were responding too. Comments are summarised under the most relevant question (including Other Comments).

Comments from respondents who didn't answer the questionnaire are also summarised under the relevant sections, but are not included in the figures.

Question 1: Does this document provide the guidance you would expect?

Yes 75% No 18% No answer 7% Commented 64%

- The document is thorough and I am pleased that it includes insulation measures that can be employed and guidance regarding double glazing.
- The document is a manageable size, particularly for the less familiar.
- Document is easy to read with generally relevant information.
- This is a much used document and the draft seems to address several topical issues, such as upgrades to thermal efficiency, which are not fully considered in the current version.
- This document explains in detail the importance of windows to listed buildings and to other buildings in Conservation Areas.
- Although the topics that would be expected are covered, the language could be strengthened to avoid misinterpretation. Much of it is vague – words and phrases such as “preferable” are not helpful when determining an application.
- The focus is clearly on the local Planning Authorities to provide advice on the acceptability of replacing windows, but I was surprised that there was no overview of an approach in line with SPP or other government guidance.
- It would be useful to highlight the clauses relevant to windows where legislation and policy is listed.
- The guidance provides a robust introduction to the importance windows make on the character and appearance of historic properties.
- The re-issue of this guidance should be used to encourage the repair, rather than the replacement, of historic windows.
- The document should deal more directly with proposed changes to windows. Its focus seems to be more about safeguarding them as they are.
- Insufficient/ confusing information regarding double glazed units.
- Surprised that sandwich astragals are not supported as this can be a means of avoiding heavy astragals where DG fitted to small multi-paned windows.
- The historical background and context is all very interesting but the nub of the issue for those using the guidance will be whether consent is required, and whether it will be granted.
- The document talks about energy conservation and the use of shutters and interlined curtains at night, but does not address energy loss during the day. HES is putting huge obstacles in the way of overcoming the challenges of energy conservation in listed buildings.
- The document generally conforms with the City of Edinburgh Council's guidance on replacement windows but there also are a number of statements that conflict with it.

Question 2: Does the document leave out anything that should be included?

Yes 57%

No 36%

No answer 7%

Commented 71%

- A distinction needs to be clearly drawn between what is acceptable for listed buildings and unlisted buildings in conservation areas.
- A more definitive statement on the use of uPVC is needed. A considerable number of LBC appeals that go to DPEA involve uPVC window replacement. Reporters seem to struggle with the lack of direction from HES on this particular topic and revert back to the fact that uPVC does not preserve or enhance the character of listed buildings. This should be reflected better in your guidance. It is not strong enough to say 'changes in original window framing material should be avoided.'
- Include a statement along the lines of '*HESPS June 2016, the Scottish Planning Policy, Historic Environment Circular 1 and Historic Environment Scotland's Managing Change in the Historic Environment guidance notes are the documents to which planning authorities are directed in their consideration of applications for conservation area consent, listed building consent for buildings of all three categories and their consideration of planning applications affecting the historic environment and the setting of individual elements in the historic environment*'. Similar text is on the HES website but this document doesn't set out the context for this guidance clearly.
- More of an emphasis required on sustainability. The quality of the wood in historic windows cannot be replicated with modern timber; refurbishment of defective wood rather than complete replacement should be recommended as a more sustainable option to complete replacement.
- The aesthetic value from inside the window is unrepresented. A brief passage of the benefits of traditional windows from the inside should be added.
- Traditional sash and case window offers wider/better sightlines than other sash types.
- It does not answer satisfactorily the overall issue of energy conservation.
- The document does not say that a change from clear glazing to wired or obscured glazing is not normally acceptable, as the current version does. This is a very useful sentence in the current guidance.
- More on size and pattern of astragals and importance of replicating these if windows are being replaced.
- It mentions Simplex hinges, but does not make clear whether they would be original, and if not, when they might have been introduced.
- It would be useful to know what percentage of Crown glass (or similar) is worth preserving.
- There is no indication that ironmongery and hardware can contribute to significance.
- The architectural as well as the practical value of shutters as part of the window could be mentioned.
- Internal shutters and ingo panels are a fundamental part of the character of a window opening. Just as much regard should be taken to maintain them without altering their character.
- Guidance on who determines if a window is beyond repair would be useful - e.g. joiner with relevant experience of historic buildings or conservation accredited professional.
- Clear definition of what is beyond repair.

- Independent surveys of individual windows should be required rather than being 'useful'.
- Current HES advice is that it is unusual for all original windows to be so dilapidated that they need replacing at the same time - this is a very helpful point and it would be good to have it included.
- Stronger advice on how to fit double glazing into existing frames.
- Fitting of windows in modern materials by direct screws into masonry can damage the fabric of the building. Traditional sash windows should be fitted with timber wedges.
- At present there is no reference to burnt sand/linseed mastic. We consider that this traditional mastic is a must for timber sash and case windows.
- Security sash restrictors are often unknown and underused. They are simple to install and use, look good and offer great security even when a window is slightly open.
- When the window needs to be taken out or replaced consider insulating the void behind.
- One of the main causes of decay of cills and lower frames is the build-up of debris within the sash boxes. These should be cleaned out whenever cords and/or weights are replaced. This is rarely mentioned in other guides.
- HES research indicates that sealed double glazed units degrade and lose their thermal performance. This should be mentioned.
- Add guidance on the relative inefficiency of replacement double glazed panes and fully installed double glazed units as compared to the non-invasive and more efficient measures such as draught-proofing and secondary glazing.
- Most historic glass with surface irregularities is unsuitable for double glazing.
- Detailed guidance on specification of repairs.
- Paints to be used.
- The fact that weights have to be adjusted when single glazing is replaced with double.
- A short video explaining how traditional sash and case windows work, what can be done to improve/repair them and what replacements should look like.
- It would also be helpful if there was a rule of maximum permitted astragal size – 24mm or to match existing? - where authentic and traditional.
- Would be good to state that slightly wider DG cavity than standard 6mm slimline cavity may be acceptable in non-astragalled S&C windows, e.g. in later areas of New Town.
- Information on skylights and dormer windows, including their facings, would be useful. At the moment they are covered in a very brief paragraph in the Roof Managing Change – if they are to remain there, a cross reference from the Windows Guidance would be helpful. Guidance on when it is acceptable to add a new skylight or dormer to a building and how they should be designed would be appreciated.
- Information about leaded windows - maintenance/ repair/ replacement.
- More information on traditional casement windows and C20th windows.
- It would be helpful to refer to some of the unusual window designs that exist and the importance of retaining, repairing or replicating them exactly.
- It is worth obtaining the advice of a specialist glazier when stained or other historic glass and lead comes are encountered.
- Photographs showing examples of historic glass.
- Cross-section showing what a window plan with solid astragals looks like.
- Diagrams of the inside and outside view of sash windows.
- Retain the previous information about dates and the historical development of glass.
- The window tax and the dates it was in force should also be explained if referring to it.

- A glossary would be a really helpful addition.
- Advice that the HES listing description may include reference to historic glass.
- I believe there is a need to cover the issue of the cost of repair in this guidance. Particularly how to decide when it is worth keeping a window, even when repair costs are very high.
- A section on joinery construction techniques, describing how sash boxes were fitted into masonry openings, how internal linings and shutters were fitted, and the importance of traditional burnt sand and boiled linseed oil mastic pointing between frame and masonry would be useful.

Question 3: Does the document include anything you think is unnecessary?

Yes 28% No 61% No answer 11% Commented 36%

- The document provides the right level of detail and is clearly organised and headed so that people can easily refer to the relevant section.
- Whilst information on the history of windows and glazing is interesting and has its uses, it is questioned whether Managing Change is the right place for it. To make the document more succinct, could this be moved to a different document or shortened?
- *Identifying interest of windows:* In general, this section setting out the architectural and historical importance of windows risks creating some confusion by appearing to be comprehensive and categorical when it is not. This information could be summarised and placed either with references or appendices with fuller information at the end elsewhere.
- Not sure how links to windows blocked for tax reasons are crucial to this document.
- There is a lot of summarised information in this document. If someone reads a document like this, some prior knowledge should be assumed.
- Too much text – a video might be helpful. This could be subtitled and would be accessible to a wider number of people.
- Page 8 on slim-line double glazing, "the units are not optimised for thermal performance". This wording is quite discouraging in my opinion and should either be omitted or amended.
- The reference to linseed putty should require that glazing manufacturer's advice is taken as there are ways of using linseed putty on the outside. Some sealed units react to acetic acid [commonly used in silicone sealants] rather than linseed oils.
- We suggest that slim profile double glazing is separated out from double glazing proper, as the narrow gap between the slim profile double glazing panels, and the use of the existing frames rather than new frames, does not provide the same level of effectiveness and lifespan as thicker more traditional double glazed units.

Question 4: Do you have any alternative examples you would like us to use to help illustrate any of the points made in the document?

Yes 47% No 39% No answer 14% Commented 50%

- Photographic examples of the types of glazing described will be useful when prepared.
- It will be very helpful if illustrations show some of the technical dos and don'ts referred to in the text, e.g. examples of appropriate or inappropriate ventilation measures; examples of appropriate astragals used in the double glazing of traditional Georgian or other multi-pane window units.
- Examples where window replacement has not been allowed because the windows are in a condition that is still deemed to be repairable. This could show repairs such as a cill replacement that have been carried out instead and / or energy improving upgrades. It would be ideal if this could also show the thermal and cost benefits of effective repair vs replacement. We have seen some great examples of sash and case window repairs at Midstocket Church in Aberdeen.

- Many showing historic glass - one of the most crucial points of an assessment - the sparkle, reflective quality, irregularities etc.
- A good example of a drawing submitted with a consent application that shows correct detailing for a sash and case window.
- Examples and technical drawings showing the detail of a windows construction.
- Video.
- Pictures of different types of glass in situ would be helpful for identification.
- Historic ironmongery, and specialised opening systems.
- Sandwich astragals.
- Page\Park did some exemplar window restoration at Mansion House in Rothesay. This did not involve change other than the replacement of missing panes of glass with 'engineered historic' Restover glass and ironmongery. They have some good photographs, including wooden pulley wheels.

Question 5: Our managing change guidance notes refer to best practice for all historic buildings. This represents our wider role as a lead body for the historic environment. Do you agree with this approach, or would it be useful to provide more specific guidance on statutory consent procedures?

Yes 57% No 29% No answer 14% Commented 64%

Note: this question was poorly worded and misunderstood by most respondents. The format of the question was not suitable for a yes/no answer and therefore the figures above are not useful.

We meant to ask whether this guidance should apply to all historic buildings or just listed buildings. Most respondents thought we were asking whether we should provide guidance on consent processes or more detailed technical guidance. Views on the question we meant to ask are:

- The focus on best practice is most relevant and the correct approach for HES guidance.
- There is a concern about the disparate approaches taken by Councils in applying this advice. HES should encourage Councils across Scotland to take a consistent approach.
- Planning authorities should use MCGNs when considering listed building consent applications and planning applications that affect the historic environment (including conservation areas and the setting of individual historic buildings). This should be made clear at the start of the document.
- The guidance needs to be specific to listed buildings and buildings in conservation areas as this will give greater clarity to decision makers on how policy should be developed. It should then incorporate undesignated buildings, as they often retain significant historic character.
- There is often more weight given to a listed building than a non-listed in a conservation area. This should be discussed more with advice that historic and important glass may be within both.
- Examples of category B and C listed buildings and unlisted buildings in conservation areas would show that advice is applicable to all types of building.
- Need to make a clearer distinction between requirements for listed buildings and buildings in conservation areas.
- Restrictive practices appropriate in A&B-listed buildings but not in unlisted buildings in conservation areas.

Question 6: As we continue to develop our suite of guidance, are there topic areas you would like to see covered?

Yes: 54% No: 21% Not Answered 25% Commented 64%

- Review of all existing guidance to provide more detailed advice.

- Guidance that considers buildings as a whole, rather than by individual features in the way Managing Change does.
- A complete guide that covers the process of window upgrading: window restoration, replacement windows, draught proofing, secondary and double glazing systems.
- Steel windows (non-Crittall) found in industrial buildings etc.
- External doors.
- Roof coverings including use of modern materials on extensions and sourcing slate. (5 suggestions)
- Stonework repairs. (4 suggestions)
- Removal of chimneys. (2 suggestions)
- Conversion of historic buildings, especially churches, industrial buildings and domestic buildings to non-domestic use. (2 suggestions)
- Fire Suppression systems in historic buildings
- Streetscapes and Public Realm (Equivalent to English Heritage's Streets for All).
- Joint policy with Royal Mail regarding Post Boxes.
- Enabling Development. (2 suggestions)
- Update / review of TAN 9 (Stonecleaning granite) including review of previously cleaned buildings. (2 suggestions)
- Planning Guidance specific to listed buildings: call-in procedure, compulsory purchase, enforcement.
- Historic composition or mortars, render and harl.
- Common repairs in tenements.
- Development within conservation areas.
- Inventory of Designed Landscapes.
- Energy Efficiency and sustainable retrofitting in historic buildings.
- Review of the Demolition guidance note with greater detail and further explanation of the information required for the economic viability test.

Question 7: Please provide any additional comments

Commented 39%

- Various specific comments regarding parts of the structure and layout that could be improved.
- Various specific comments regarding spelling, factual errors, repetition, grammar, and clarity.
- Various comments on where advice in text should be strengthened / made more definite.
- Do more to encourage retention of historic windows and the use of secondary glazing.
- Not all Planning Authorities have guidance on window replacement.
- Concerns about the relatively quick failure rate of some slim double-glazing units. Questions over whether HES should support these (including whether thicker units should be supported).
- I consider that the correct approach is being taken with the new windows document. Subject to useful illustrations, examples, etc. being included, this will be highly welcome guidance which provides greater detail, particularly with regard to modern window issues.
- Any further guidance which is able to persuasively put forward the case to people that they should repair rather than replace their windows may be useful.
- Several councils consider uPVC acceptable in C-listed buildings and conservation areas. It would be useful to have some specific guidance in this document on this being unacceptable, a clear description of why, and some indication of how your guidance should inform Council guidance.

- We would find it helpful if there was an allowance for the use of cassette astragals in replacement windows where the need for upgrading to double glazing can be justified and for small multi-paned openings where there would otherwise be too heavy an astragal.
- ‘Stuck-on’ astragals with internal spacer-bars should be allowed.
- HES appear to support the use of stuck-on glazing bars in some situations. What is the basis for this change in view?
- The managing change series is excellent. However, it would be helpful if all of your managing change documents emphasised that historic environment is a limited resource and find ways of convincing more owners and developers of their role in protecting it.
- Various comments seeking clarity about the width of double-glazed units that should be permitted.
- Technical concerns raised about the use of traditional linseed oil putty with laminated glass.

5 SYNTHESIS OF KEY ISSUES AND OUR RESPONSE

5.1 Introduction & Summary of Consultation responses

Following the consultation, the Managing Change note has been redrafted to reflect the responses. This section synthesises the key issues raised during the consultation and outlines how HES has responded.

The majority of respondents felt that the guidance was what they expected, but many additional points were suggested. In general it was felt that the document does not contain unnecessary material, although the quantity of historic information was questioned by a small number of respondents.

All of the specific comments received were considered during the process of redrafting. However, these can be synthesised into broad categories for ease of discussion. For each category a description of how each has been addressed during the redrafting process is offered below.

5.2 Spelling, Grammar, Terminology and Structure

Consultee Comments: A small number of specific spelling, grammar and factual errors were highlighted. Some respondents questioned the structure of the document. In particular, the quantity of historical information included (section 2) was questioned by some respondents – though most seemed to welcome this and some additional information was suggested. The structure of section 4 (Upgrading and Replacing Windows) was also questioned. It was suggested that basic principles of keeping and upgrading windows should be separated from and placed before considerations relating to double glazing.

How we have responded:

We have addressed the minor spelling and grammar issues and any errors identified. The emphasis on historical information has been reduced within the overall document in favour of more detail on upgrading and replacement, although we considered it was still important to include a historical assessment to aid recognition and assist an explanation of the importance of original and early fenestration. More detailed information, if required, is available on the links towards the end of the document.

We agreed with the latter point regarding principles and have changed the structure of the document to make the approach clearer. We have concentrated on repair as a first priority, followed by minor upgrading and finally replacement and have reset the text to address this.

Consultee Comments: A significant number of respondents felt that the language of the document is insufficiently decisive to support decision-making. Use of the word ‘preferable’ in particular, was found to be unhelpful. Conversely, some respondents sought to make elements of the text less decisive.

How we have responded:

We have removed several uses of preferable and made the document more definitive in parts. However, there must still be leeway in how the document is used by local authorities, and there may be particular circumstances that make definitive judgements problematical. We have thus tried to strike a balance.

5.3 Changes in wording and suggestions for additional information

Consultee Comments: Respondents suggested a significant number of changes to the text to elaborate, clarify or qualify the wording. 71% of respondents suggested additional information for inclusion (see section 4.3 Question 2). This included:

- Advice on window types other than sash and case, specifically dormers, skylights, leaded windows, casements and unusual glazing patterns.
- Elaboration / further explanation of points already made.
- Re-inclusion of advice that was given in the 2010 guidance.
- Technical advice.
- Suggestions for photographs and other illustrations.
- A glossary.

How we have responded:

Based on our knowledge we have decided to concentrate on the major element of windows casework - the traditional vertically sliding sash window – but have also mentioned metal windows and other types are mentioned within the text. Other window types such as dormer windows will normally still contain either sashes or casements and thus the main advice still applies. Dormer windows and skylights are also discussed under our roofing Managing Change. Unusual window patterns are mentioned and will hopefully be understood, if important, and treated accordingly.

Technical advice will be covered by our links towards the end of the document. Regarding a glossary, we intend to include, as before, the diagram of a sash window. This visually shows the components of a particular window, partly reducing the need for a glossary. Also, the information is freely available elsewhere e.g. within our linked publications and even more generally on the internet.

We have taken on board the need for updated photographs – especially of replacement windows.

5.4 Guidance on the use of uPVC windows

Consultee Comments: It was suggested that a more definitive statement on the use of uPVC is needed, noting a lack of direction on this matter. It was suggested that the document should contain specific guidance on uPVC being unacceptable with a clear description of why. The current advice against changes in material was deemed insufficient.

How we have responded:

We have noted that other materials for the replacement of timber sash windows will rarely be acceptable. Some authorities allow uPVC windows within conservation areas and, as the design of uPVC sash windows continues to evolve and improve, this may become more common.

5.5 Use of non-structural astragals (paragraph 62)

Consultee Comments: Several respondents made specific comments on this points, expressing a range of views on the use of these. One respondent strongly felt that they should be permitted; others suggested that they might be permitted in certain circumstances, including unlisted buildings;

others questioned why the draft document appeared to permit them in some circumstances and suggested a stronger wording to make it clear they are never appropriate.

How we have responded:

We believe window replacement should follow the original construction methods for traditional windows – and this would preclude the use of non-structural, applied or stick-on astragals. However, we have now noted that there could be a role for non-structural astragals where it improves the current situation and provides an aesthetic match. Their use may also be linked to the performance and installation of IGUs.

In practice local authorities may consider such approaches appropriate for conservation areas but this would be for them to decide.

5.6 Scope of document: should the guidance apply only to listed buildings or is it best-practice that is equally applicable all historic buildings?

Consultee Comments: The consultation question relating to this point was misunderstood by the majority of respondents, but six respondents gave their views on this issue, either in response to question 5, or elsewhere. The majority of the respondents seemed content with the guidance as it stands. Of the six that directly addressed this matter, a full range of views were expressed:

One respondent strongly felt that the guidance should only apply to listed buildings and that the document should clearly state that it doesn't apply to other historic buildings and that less rigorous standards should apply to them (including unlisted buildings in conservation areas).

One respondent took the view that a less rigorous approach to window replacement was appropriate in conservation areas and that the document should distinguish between standards that should be applied to listed buildings and unlisted buildings in conservation areas.

Other respondents suggested changes in wording that applied equal standards to listed buildings and unlisted buildings in conservations areas; three respondents took the view that the guidance should be applicable to all historic buildings, including undesignated ones.

How we have responded:

We have changed the usual approach and attempted to explain, at the beginning of the document, the difference between what HES are consulted on and the wider statutory regime operated by local authorities. We believe the guide is best practice but local authorities must decide (and do) on their own approach to windows within conservation areas based on local conditions and experience. There are also different approaches to C listed buildings in some guidance. This is the first document to try and address the difference between best practice for listed and historic buildings. We consider we have provided a balance.

5.7 Acceptability of double glazing and use of secondary glazing

Consultee Comments: respondents expressed a range of views on the guidance given on the use of double glazing. Some respondents welcomed the inclusion of this topic in the new draft, noting that it had been inadequately covered in the 2010 guidance, and felt that the guidance was now clear. However, other respondents found the guidance insufficient, contradictory and/or confusing. Some took the view that the guidance should be more supportive of the use of double glazing, while others felt that it is too supportive and would prefer to see a firmer line taken in support of the retention of existing windows and their replacement with matching single-glazed windows.

Two respondents took strongly opposing views on the use of secondary glazing, respectively arguing for and against its use. The respondent opposed to secondary glazing noted that it creates a more pronounced double reflection than double-glazing, creates cleaning and maintenance problems and is less thermally efficient than double-glazing. The respondent in favour of secondary glazing considers that it is a more sustainable approach, allowing historic windows made of high quality timber to remain in place, protecting the historic character and fabric of a building and noting that the maintenance issues raised by the first respondent can be addressed through design and that slim-section double glazing is not very thermally efficient.

How we have responded:

We believe that the majority of users viewing the document will be looking at either upgrading or replacing windows in historic buildings. When windows are replaced it is rare that they are replaced with single glazing so we have concentrated on the opportunities to employ thermal improvements, and thus double glazing. Triple glazing is relatively rare, but many of the same issues apply.

We have reordered the document to put repair as the first option in a sequential manner, followed by sections on other non-destructive alternatives such as secondary glazing and draught-proofing. We hope this makes it clear that our first aim is to retain historic fenestration (and glass) wherever possible.

However, we make no excuses for mentioning double glazing, which we agree was inadequately covered by the previous guide. Rather, we have attempted to show ways that this might be achieved for owners who wish to have it. It may not be possible in all situations but advances in technology have provided alternatives, some of which were unavailable (or in their infancy) when the original guidance was prepared.

Regarding secondary glazing – we believe this is a very welcome approach to upgrading historic buildings from both a technical and thermal point of view – and we remain supportive of its use. As the document states, it can retain historic windows of interest – it is also sustainable and can be long lasting. All types of double glazing degrades and eventually fails after a certain amount of years whereas internal secondary glazing has little that can go wrong.

Even when original window frames are retained damage can be caused by retrofitting d/g into existing windows if not done sensitively. There is certainly an argument that secondary glazing (either single or double glazed) is a preferable option to invasive works.

5.8 Technical concerns over the longevity of slim-section double glazing units and laminated glass, and the possible deleterious effects of both linseed oil putty and synthetic putty.

Consultee Comments: several respondents raised concerns about the relatively short life-span of some makes of slim-section double-glazed units and their modest thermal performance. These concerns are supported by HES research. Some respondents suggested that thicker forms of double glazing should be supported and sought clarification on what might be acceptable.

Linseed oil putty can cause the sealants around some double-glazed units to deteriorate, and this point was raised by some respondents. It was also noted that linseed oil putty can cause laminated glass to delaminate. One respondent also noted that some types of synthetic putty can also cause some sealants to deteriorate.

The gist of all these comments was to ensure that the guidance does not encourage or support the use of products that are known to fail or significantly deteriorate in a relatively short space of time.

How we have responded:

We have noted that some slim or narrow section glazing is not optimised for thermal performance and can, like standard units, leak and degrade (especially if not fitted according to manufacturer's instructions). On the other hand, other types of narrow glazing do meet the stringent criteria for durability.

We have mentioned that linseed oil putty may cause deterioration in unit seals, (this is often due to faulty installation – care must be exercised) and have also mentioned that synthetic putty is available. We have also suggested that timber fillets can be used if they replicate the putty section.

5.9 Replacement of windows that are inappropriate for the proposed new use of a building (paragraph 55)

Consultee Comments: Several respondents were concerned by the suggestion that windows could be replaced if they are unsuited to a proposed new use. It was felt that a more nuanced approach is required here, including investigating the potential for altering existing windows and the possibility that a new use might not be appropriate if it requires windows to be replaced.

How we have responded:

We have removed this statement in conjunction with a reordering of sections within the document.

5.10 Requirement for window surveys (paragraph 68) and questions relating to judging whether windows are beyond repair

Consultee Comments: Some respondents felt that a stronger line should be taken regarding the requirement for a window survey before replacement is proposed, saying this should be mandatory. Other respondents sought further advice on how to tell whether a window is beyond repair and who is qualified to make this judgement.

How we have responded:

We have noted that a window survey by a skilled tradesman is useful, and a specialist joiner may be able to advise. However, it should normally be possible to tell the difference between a superficial lack of maintenance e.g. peeling paint, and more serious rot and damage to the entire window. We have also included more guidance on what this might imply – e.g. window sills are often replaced throughout the life of a window and a rotten sill doesn't imply the window is beyond repair.

5.11 Greater emphasis on compliance with Building Regulations

Consultee Comments: One respondent emphasised the importance of complying with building regulations (including when they conflict with protecting the character and fabric of historic building), and suggested a number of amendments relating to this.

How we have responded:

We have added a section on compliance with building regulations and the provision of new windows. With the former there is often scope to better the situation in overall works (e.g. thermally) and some flexibility is often allowed for historic buildings. The latter section has been included after concerns by the GGF on glazing being fitted that does not comply following installation. The policing of this element is the role of local authority trading standards teams.

6 CONCLUSION

Our intention with this document was to provide a user-friendly guide to best practice when dealing with windows in historic buildings. However, for the first time in this series of Managing Change documents we have attempted to provide a clearer differentiation between listed buildings and historic buildings and have set out this at the beginning of the document. Most authorities have specific and often very detailed guidance on window replacement – and there is a considerable degree of variance between all. Thus, local authorities may take another approach within conservation areas or even with C listed buildings, according to local custom and conditions. We hope the document strikes a sensible balance.

We have also made it clearer in the text that the preferred solution remains the repair of original windows as a first option, then the consideration of upgrading, and only when these options have been considered, progress to replacement.

There was some concern that the previous document was too historically focussed and that its main use, in practice, would be for users to assess applications to alter or replace windows. Thus, we have tried to address the adaptation and replacement of windows more successfully within the document. We have, at the same time, retained the historic section and links to further information on windows available on our website.

Following on, we have tried to be more specific on the types of replacement window and glazing available and what may be acceptable. This again follows concerns that the previous document didn't adequately reflect replacement windows and, in particular, double glazing. Continuing technological advances in glazing manufacture allow a more nuanced approach than was previously possible. (there have also been technical advances in timber treatment and paint types which may result in added durability of components).

Technically, we understand the concerns strongly made by some (the GGF in particular) regarding non-compliant installation of double glazing (IGUs). However, our primary concern has to be with the historic environment – and betterment. Non-compliant installation is a matter for local authority trading standards departments. To add to this, and as above, a nuanced approach is possible with many systems of double glazing that do conform to all standards.

Alongside technical considerations we have tried to focus on the importance of design. The historical evolution of windows explains that different types of window exist with different astragal patterns and glazing sizes – they reflect different eras, fashions, technology and even tax regimes. Thus the design of replacement windows is important - either replicating the existing pattern accurately or returning to an earlier or original configuration. The detailed design of components in a window are also important.

In conclusion the document has tried to address many of the consultation responses (often competing) to give a sensible, balanced and measured document.

7 ANNEX I: CONSULTATION QUESTIONNAIRE

Managing Change in the Historic Environment Guidance Note: Windows – Consultation Questions

Historic Environment Scotland is currently updating the series of non-statutory guidance notes on best practices in Managing Change in the Historic Environment. These documents provide guidance on making changes to the historic environment and are in line with [Scottish Planning Policy](#) and [Historic Environment Scotland Policy Statement](#).

We are now seeking comments on our revised guidance on *Managing Change in the Historic Environment: Windows* and would greatly appreciate your views on this draft to help us finalise the text. The existing guidance note (which this new document will replace) can be found on our [website](#) with the other notes in the series.

We are particularly keen to hear from those who have experience in applying for permission to replace windows (whether as an applicant or agent) in listed buildings or within conservation areas and those in local authorities involved in determining applications.

The consultation document is text only at this stage, and will be fully illustrated and edited before publication.

The survey asks 7 questions and should take approximately 15-20 minutes to complete. Unless you give us your permission to publicly share your responses and attribute them to you, any views expressed will be anonymised and non-attributable to individuals and organisations. This consultation will close at 6pm on **Friday XX XXXXX**.

If you wish a pdf or paper version of the questionnaire, please e-mail your request to HMStakeholderEngagement@hes.scot. If you would like to speak with us about this consultation, or if you have any questions, please contact Heritage Management Business Support on 0131 668 8716.

Consultation questions

1. Does this document provide the guidance you would expect?	Yes / No Free text
2. Does the document leave out anything that should be included?	Yes/No Free text
3. Does the document include anything you think is unnecessary?	Yes/No Free text
4. Do you have any specific-examples you would like us to use to help illustrate any of the points made in the document?	Free text
5. Our guidance notes refer to best practice for all historic buildings. Do you agree with this approach or would it be useful to provide more targeted and specific advice on listed buildings?	Yes/No Free text
6. As we continue to develop our suite of guidance are there topic areas you would like to see covered?	Free text
7. Additional comments	Free text

Following consultation, a report containing a summary of all the responses, which may include your personal details, will be published on our website, held in our library and made available to the public on request. However, we need to know how you would like your response and personal details handled.

Do you agree to the following being made available to the public?	
Your response	Yes / No
Your organisation (if applicable)	Yes / No
Your name	Yes / No
Your address	Yes / No

We may send you notifications and updates in relation to this consultation.

Are you content for Historic Environment Scotland to contact you again in relation to this consultation exercise?	Yes / No
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Thank you for completing this survey and giving us your views. Once the consultation closes a report will be prepared summarising all responses and how these have informed our finalised guidance notes. We hope to publish this in summer 2017.

Privacy Notice

About this survey

Historic Environment Scotland (HES) is currently updating the series of non-statutory guidance notes on best practices in Managing Change in the Historic Environment. These documents provide guidance on making changes to the historic environment and are in line with [Scottish Planning Policy](#) and [Historic Environment Scotland Policy Statement](#).

We are now seeking comments specifically on our revised guidance note on *Managing Change in the Historic Environment: Windows*.

Privacy notice

Under the Data Protection Act 1998, we have a legal duty to protect any information we collect from you. This notice sets out the basis on which any personal data you provide to us will be processed by us.

HES recognises the importance of protecting the privacy of the information you provide us. Any personal data you provide will be held and used in accordance with the Data Protection Act.

For further information on the HES Privacy Policy and Data Protection Policy please see the link: www.historicenvironment.scot/privacy-policy

Information we hold

The personal information we will hold from this survey can include: name, address, job title, telephone number and e-mail address.

Usage of the information you provide

Personal information provided to us through this survey will be used by HES to inform the finalised guidance note on *Managing Change in the Historic Environment: Windows*.

Third party intermediaries

The information you provide will be stored by SurveyMonkey for the duration of this survey, following which it will be deleted by Survey Monkey.

Freedom of Information (Scotland) Act 2002 and Environmental Information (Scotland) Regulations 2004

You should be aware that Historic Environment Scotland is subject to the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004, and we will have to consider any requests to see full responses made under the terms of this legislation, regardless of whether or not respondents have asked for their personal data to be treated as confidential.

Storage of personal information

The information you provide will be stored by SurveyMonkey for the duration of this survey, following which it will be deleted by SurveyMonkey.

Your information will be stored securely by Historic Environment Scotland. We will ensure your data is held securely with password-protected access for a limited number of staff to process your information.

Historic Environment Scotland will hold the information provided to us through this survey for up to 2 years.

Information held by SurveyMonkey will be deleted once the survey closes.

Contact us

If you have any questions or suggestions regarding our privacy policy or Data Protection Policy, please contact us at;

Telephone: 0131 668 8600

Email: dataprotection@hes.scot

Data Protection Officer
Historic Environment Scotland
Longmore House
Salisbury Place
Edinburgh

8 ANNEX 2: CONSULTEE LIST

The following list gives the organisations asked to provide views as part of the consultation process. Organisations are only listed once where multiple individuals within them were contacted.

For all local authorities, planning, development management, and conservation services were contacted.

Planning Authorities

Aberdeen City Council	Highland Council
Aberdeenshire Council	Inverclyde Council
Angus Council	Loch Lomond and Trossachs National Park
Argyll & Bute Council	Midlothian Council
Cairngorms National Park	North Ayrshire Council
City of Edinburgh Council	North Lanarkshire Council
Clackmannanshire Council	Orkney Islands Council
Clydeplan SDPA	Perth and Kinross Council
Comhairle nan Eilean Siar	Renfrewshire Council
Dumfries and Galloway Council	Scottish Borders Council
Dundee City Council	Shetland Islands Council
East Ayrshire Council	South Ayrshire Council
East Dunbartonshire Council	South Lanarkshire Council
East Lothian Council	Stirling Council
East Renfrewshire Council	Tayplan SDPA
Falkirk Council	The Moray Council
Fife Council	West Dunbartonshire Council
Glasgow City Council	West Lothian Council

Public Bodies

Architecture & Design Scotland	Scottish Government, Culture and Historic Environment Division (CHED)
CADW	Scottish Government, Directorate for Planning and Appeals (DPEA)
Cairngorms National Park	Scottish Government, Directorate of the Built Environment
English Heritage	
Improvement Service	
Northern Ireland Environment Agency	

Private Sector

Brodies LLP	Geddes Consulting
CMS	GVA
Duns Castle	Halliday Fraser Munro Architects
Edinburgh Sash and Case	JLL
Elder and Canon Architects	Land Use Consultants
Gareth Hoskins Architects	Montagu Evans

Morgan McDonnell Architects
Richard Murphy Architects
Simpson & Brown Architects
Slimlite Double Glazing

Sturrock Joinery
TJ Ross, Strathmiglo
Turley Associates

Professional Bodies, Membership Organisations, Heritage Trusts and Advice Groups

Architectural Heritage Society of Scotland (AHSS)
Built Environment Forum Scotland (BEFS)
Chartered Institute of Building
Changeworks
Historic Houses Association
Home Energy Scotland
Glasgow Building Preservation Trust
Glasgow City Heritage Trust
Glass and Glazing Federation

Institute of Historic Building Conservation
National Trust for Scotland (NTS)
Royal Incorporation of Architects in Scotland (RIAS)
Royal Town Planning Institute Scotland (RTPI)
Scottish Civic Trust
Scottish Land and Estates
Society of Antiquaries of Scotland

Universities

Robert Gordon University, Aberdeen, Scott
Sutherland School of Architecture and Built
Environment
University of Aberdeen
University of Dundee, Department of
Architecture
University of Dundee, History Department
University of Edinburgh, School of History,
Classics and Archaeology
University of Edinburgh Estates Development
Edinburgh School of Architecture and
Landscape Architecture (ESALA)
Edinburgh College of Art

University of Glasgow, Estates Department
University of Glasgow, Mackintosh School of
Architecture
University of Glasgow, Archaeology
University of Glasgow, History
University of St Andrews, Art History
University of Strathclyde, Architectural Design
and Conservation
University of Stirling, History
University of Stirling, Heritage and
Conservation
University of Highlands and Islands