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**HURD
ROLLAND**

SBC Planning Ref 22/00371/FUL

17 George Street, Eyemouth

Heritage Statement

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R8135/Note

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PART A: INTRODUCTION

1.00 Introduction

1.01 In connection with an appeal to the Local Review Body of Scottish Borders Council, in relation to an Application for Planning Permission for the proposed alteration and extension of 17 George Street, Eyemouth (Ref 22/00371/FUL), I have been asked by Ferguson Planning, Shiel House, 54 Island Street Galashiels TD1 1NU, acting on behalf of the Applicant, to provide an independent opinion.

1.02 I am Kenneth J A Williamson, BSc (Hons), Dip Adv Arch (Aberdeen), RIBA, FRIAS, MCI Arb, a Partner in the firm of Architects, the Hurd Rolland Partnership, 12 Abbey Park Place, Dunfermline KY12 7PD.

1.03 I trained to become an Architect at Robert Gordon's Institute of Technology in Aberdeen and at the Illinois Institute of Technology in Chicago. I graduated in 1986 and joined the Construction Technology Section of the Hurd Rolland Partnership in 1998 having worked as an Architect in London and Edinburgh.

1.04 I have been Partner in charge of Hurd Rolland's consultancy section since 2002. Amongst other specialist consultancy services, the section provides objective specialist advice on planning and design matters relating to listed buildings and heritage sensitive sites. In this regard I have acted as built heritage adviser on a large number of heritage sensitive development projects throughout Scotland including;

- Redevelopment of the former Edinburgh Royal Infirmary.
- Redevelopment of South Side of St Andrew Square, Central Edinburgh.
- Redevelopment of the former Category A Listed Custom House, Broomielaw, Glasgow.
- Marischal Square regeneration project, Aberdeen.
- Redevelopment of the Category A and B Listed former Woolmanhill Hospital, Aberdeen.
- Redevelopment of Category A Listed Broadford Works, Aberdeen.

1.05 I have also prepared and presented expert evidence on design and built heritage matters in relation to various Planning Inquiries including;

- Queen Street Station Inquiry.
- Haymarket Goods Yards Inquiry.
- Various Wind Farm, Supermarket and Housing developments throughout Scotland.

1.06 I am currently project partner for the redevelopment of Ashley Stables a Category B Listed former courtyard stable complex near Ratho in West Lothian.

1.07 A copy of my general CV is attached at **Appendix 1**.

2.00 Scope

2.01 An Application for Planning Permission for the proposed alteration and extension of 17 George Street, Eyemouth was submitted to Scottish Borders Council (SBC) on 8th March 2022.

2.02 Around August 2022, I provided informal comments to Ferguson Planning following concerns expressed by SBC Heritage & Design in relation to the originally submitted proposals (**Appendices 2 - 4**). The proposals were subsequently substantially adjusted and re-submitted with a view to addressing these concerns (**Appendices 5 & 6**).

2.03 This notwithstanding the Application was refused by Scottish Borders Council on 3rd November 2022 for the following stated reasons (**Appendix 1**);

“1 The proposed development does not accord with policies PMD2 (Quality Standards) and EP9 (Conservation Areas) of the Local Development Plan 2016. The proposed development, by reason of its scale, form, detailing and proportions, would not be appropriate for the existing building and would harm the special architectural and historic character and appearance of the Conservation Area.

2 The proposed development does not accord with policy HD3 (Protection of Residential Amenity) of the Local Development Plan 2016. The extension, by reason of its siting and height, would result in the loss of light to habitable rooms of neighbouring residential properties to the south and east. In addition, its height and blank walling on its south and east elevations would have an overbearing relationship and adverse visual impact upon the same neighbouring residential properties. These adverse impacts would harm the amenity of occupants in neighbouring residential properties.”

2.04 I have been appointed to provide a high-level commentary regarding the first reason for refusal.

PART B: KEY POLICY & GUIDANCE

3.00 Key Relevant National and Local Policy and Guidance

3.01 Statutory Duties

Key statutory duty in relation to proposed development within a Conservation Area is set down in the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997;

“General duty as respects conservation areas in exercise of planning functions

64(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

64(2) Those provisions are—

(a) the Planning Acts.....”

3.02 The key relevant current national and local policy and guidance in this respect, includes;

- Scottish Planning Policy, June 2014 (SPP), revised in December 2020 (**Appendix 7**)
- Historic Environment Policy for Scotland, May 2019 (HEPS) (**Appendix 8**)
- Managing Change in the Historic Environment: Setting (**Appendix 9**).
- Scottish Borders Council Local Development Plan 2016 (**Appendix 10**).

3.03 National Policy and Guidance

Scottish Planning Policy (SPP 2014)

National policy and guidance included within SPP 2014 states (**Appendix 7**);

“Policy Principles

137. The planning system should:

- *promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning; and*
- *enable positive change in the historic environment which is informed by a clear understanding of the importance of the heritage assets affected and ensure their future use. Change should be sensitively managed to avoid or minimise adverse impacts on the fabric and setting of the asset, and ensure that its special characteristics are protected, conserved or enhanced....*

Conservation Areas

143. Proposals for development within conservation areas and proposals outwith which will impact on its appearance, character or setting, should preserve or enhance the character and appearance of the conservation area. Proposals that do not harm the character or appearance of the conservation area should be treated as preserving its character or appearance. Where the demolition of an unlisted building is proposed through Conservation Area Consent, consideration should be given to the contribution the building makes to the character and appearance of the conservation area. Where a building makes a positive contribution, the presumption should be to retain it.... ”

3.04 Historic Environment Policy for Scotland (HEPS)

HEPS replaced HESPS in May 2019 as the overarching national policy statement directing decision making affecting the historic environment (**Appendix 8**). HEPS refers to the Managing Change in the Historic Environment suite of documents published from 2010 onwards as the main detailed source of guidance regarding proposals for change within the historic built environment. The key relevant guidance relating to setting of historic assets or places is found in Managing Change in the Historic Environment: Setting.

3.05 Managing Change in the Historic Environment: Setting

Regarding the impact of proposed development on the setting of any historic asset, including Conservation Areas, Managing Change in the Historic Environment: Setting states (**Appendix 9**);

“3. ASSESSING THE IMPACT OF CHANGE

There are three stages in assessing the impact of a development on the setting of a historic asset or place:

Stage 1: identify the historic assets

that might be affected by the proposed development.

Stage 2: define and analyse the setting

by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced

Stage 3: evaluate the potential impact of the proposed changes

on the setting, and the extent to which any negative impacts can be mitigated.....

4. MITIGATION OF IMPACTS AND ENHANCEMENT OF SETTING

Where the assessment indicates that there will be an adverse impact on the setting of a historic asset or place, even if this is perceived to be temporary or reversible, alterations to the siting or design of the new development should be considered to remove or reduce this impact.

The most effective way to prevent impacts on setting is during site selection and early design. Any mitigation and enhancement proposals should be discussed as part of the pre-application process.”

3.06 Environmental Impact Assessment Handbook

HES published the Environmental Impact Assessment Handbook in April 2018 (**Appendix 11**). While the EIA Regulations do not apply to proposed development at this scale, for ease and consistency of referencing, the following terminology regarding magnitude of and significance of impact, set out in Appendix 1 of the Handbook, might readily be applied to the impact of the proposed development on Eyemouth Conservation Area, which can be considered to be a medium or possibly low sensitivity receptor;

Magnitude of Impact

Magnitude	Guideline Criteria	
	Adverse	Beneficial
Substantial	Changes to the fabric or setting of a heritage asset resulting in the complete or near complete loss of its cultural significance, such that it may no longer be considered a heritage asset.	Preservation of the asset in situ where it would be completely or almost completely lost in the do-nothing scenario.
Moderate	Changes to the elements of the fabric or setting of the heritage asset that contribute to its cultural significance such that this is substantially altered.	Changes to key elements of the asset’s fabric or setting that result in its cultural significance being preserved, where they would otherwise be lost, or restored.
Slight	Changes to the elements of the fabric or setting of the heritage asset that contribute to its cultural significance such that this is slightly altered.	Changes that result in elements of the asset’s fabric or setting that detract from its cultural significance being removed.
Negligible	Changes to fabric or setting that leave significance unchanged.	

Significance of Effect

Sensitivity of Environmental Receptor	Magnitude of Change			
	Substantial	Moderate	Slight	Negligible/None
High	Major	Major	Moderate	Negligible/None
Medium	Major	Moderate	Minor	Negligible/None
Low	Moderate	Minor	Minor	Negligible/None

3.07 Local Policy and Guidance

The key relevant local plan guidance regarding development within a Conservation Area is included at Policy EP9 of the adopted Scottish Borders Council Local Development Plan, which states (**Appendix 10**);

“POLICY EP9: CONSERVATION AREAS

The Council will support development proposals within or adjacent to a Conservation Area which are located and designed to preserve or enhance the special architectural or historic character and appearance of the conservation area. This should accord with the scale, proportions, alignment, density, materials and boundary treatment of nearby buildings, open spaces, vistas, gardens and landscape.....”

3.08 The guidance specifically cross references Policy EP9 to Policy PMD2. Relevant to the present application Policy PMD2 states;

“POLICY PMD2: QUALITY STANDARDS

All new development will be expected to be of high quality in accordance with sustainability principles, designed to fit with Scottish Borders townscapes and to integrate with its landscape surroundings. The standards which will apply to all development are that.....

PLACEMAKING AND DESIGN

- h) it creates developments with a sense of place based on a clear understanding of the context, designed in sympathy with Scottish Borders architectural styles. This need not exclude appropriate contemporary and/or innovative design,*
- i) it is of a scale, massing height and density appropriate to its surroundings, and where an extension or alteration, appropriate to the existing building,*
- j) it is finished externally in materials, the colours and textures of which complement the highest quality of architecture in the locality and, where an extension or alteration, the existing building,*
- k) it is compatible with, and respects the character of the surrounding area, neighbouring uses and neighbouring built form,*
- l) it can be satisfactorily accommodated within the site,*
- m) It provides appropriate boundary treatments to ensure attractive edges to the development that will help integration with its surroundings.....”*

PART C: COMMENTARY

4.00 Eyemouth Conservation Area Statement

4.01 Introduction

From a built heritage standpoint, the key consideration is the impact of the proposed development on the existing character and appearance of Eyemouth Conservation Area (**Section 3.00**).

4.02 SBC have not prepared a full Conservation Area Appraisal for the Eyemouth Conservation Area. However, a series of Conservation Area Statements for each of the conservation areas located within the Scottish Borders area is published on the SBC website (**Appendix 12**).

4.03 The published map of the Eyemouth Conservation Area is included at **Appendix 20**. For ease of reference, I have also attached a copy of the present street layout within the vicinity of 17 George Street at **Appendix 27**.

4.04 Conservation Area Statement

The Eyemouth Conservation Area Statement was published in July 2012 (**Appendix 12**). The full statement notes;

“Conservation Area Statement

The Conservation Area in Eyemouth includes the entire town centre, the harbour and a considerable part of the coast.

Eyemouth is Scotland’s second largest inshore fishing port and typifies 18th century harbour front development however, there has been a harbour here since the 12th century.

The remains of a series of fortifications from prehistoric times to the 20th century are situated in the most northerly part of the Conservation Area.

The Conservation Area retains many of the distinctive townscape characteristics that are only found within a Scottish coastal town such as Eyemouth. These include the harbour and a considerable part of the coast.

A number of villa-style properties along the west side of Victoria Road form an attractive entrance leading to the town centre, along with the many good examples of traditional architecture (particularly the Burgh Chambers, Gunsgreen House and the terraces along Paxton Terrace and Armitage Street).

The traditional layout of Harbour Road, the High Street and the Market Place are also important features. The Town's Harbour is, in particular, essential to the character of the place.

The coast is an additional element to the townscape quality along with the coastal walk and the Marine Parade.

Properties range from single storey to three, and three and a half storeys along the Harbour Road.

Any new development must therefore aim to contribute to the existing character of the Conservation Area. Also included within the Conservation Area is retail and other commercial properties, any alterations to these should seek to respect the individual building and the wider Conservation Area.

Within the amended Eyemouth Conservation Area there are 64 listed properties including two of category 'A'."

- 4.05 In this respect it can be seen that the potential impact of the proposed development will be restricted to the character and appearance of the presently existing warren of streets bounded by Harbour Road, Marine Parade and Market Place/High Street (**Appendices 20, 27 & 32**).
- 4.06 I have included sequences of photographs downloaded from Google Maps of the approaches to 17 George from the South, West, East and North at **Appendices 21 - 24**.
- 4.07 It is important to note that the built environment within the immediate vicinity of 17 George Street comprises a mix of modern residential development to the immediate east (Marine Square, Swan Court etc (**Appendix 33**), traditional buildings with utilitarian alterations on George Street itself (**Appendix 34**) and listed and less altered traditional buildings to the immediate west (**Appendices 29 & 35**).
- 4.08 Conclusions**
- Eyemouth Conservation Area covers a large area and a variety of characteristic component elements (a series of fortifications from prehistoric times to the 20th century, villa-style properties along the west side of Victoria Road, many good examples of traditional architecture (particularly the Burgh Chambers, Gunsgreen House and the terraces along Paxton Terrace and Armitage Street), the traditional layout of Harbour Road, the High Street and the Market Place, the coastal walk and the Marine Parade).
- 4.09 In real terms, using the terminology set out in the EIA Handbook (**Paragraph 3.06**), the proposed development will have only a slight or negligible impact on the wider conservation area such that its significance might reasonably be considered minor or negligible.

4.10 It is the localised impact of the proposed development on the essential characteristics and appearance of the area bounded by Harbour Road, Marine Parade and Market Place/High Street that requires to be considered here.

5.00 SBC Heritage & Design

5.01 Introduction

Within this section I provide a brief commentary on the consultation responses received from SBC Heritage & Design specifically quoted within the Part III Report (Incorporating Report of Handling) (**Appendix 13**).

5.02 SBC Heritage & Design (response to initial proposals)

The objection to initial proposals from the SBC Heritage & Design, dated 11th April 2022, relates to the originally submitted proposal (**Appendices 3 & 4**). The assessment is quoted in full in the Part III Report (**Appendix 13**).

5.03 The SBC Heritage & Design (response to initial proposals) was the consultation response I provided informal comments on to Ferguson Planning in August 2022 (**Paragraph 2.02**), after which the original proposals were substantially adjusted and re-submitted to address the concerns raised (**Appendices 5 & 6**).

5.04 Background and Site Description

Regarding the location of the site within the wider area, the initial response by SBC Heritage & Design noted (**Appendix 18**);

“The building is within the Eyemouth Conservation Area. It is situated in the historic core of the town. Due to the irregular alignment of buildings and routes in the area, it terminates views along George Street, St Ella’s Wynd and Tod’s Court, whilst also being visible from George Square and the seafront. It is therefore a relatively prominent building.....”

5.05 While the existing main house terminates the view in the approach from the south along George Street and is prominent in this respect (**Appendix 20**), the house was not designed as a terminating element per se.

5.06 In the approach from the west along St Ella’s Wynd, the view “terminates” on the utilitarian “lean to” store extending from the main house, and the blank gable wall of the adjacent property, with the modern development at Marine Square visible immediately beyond (**Appendices 20 & 21**).

5.07 In the approach from the east from George Wynd, the main house is visible rather than a terminating element (**Appendix 23**). Again, the approach is dominated by the modern

developments at Swan Court and Marine Square and the rear and side elevations of 13 and 15 George Street (**Appendices 23 & 27**).

5.08 The initial response by SBC Heritage & Design continued;

“The area around Tod's Court in particular retains much historic integrity. Other elements of the surrounding streets are altered, but still retain their traditional character. The layout of streets and buildings, their traditional form and appearance contribute to the area. Although altered, 17 George Street retains its traditional character, form, materials and detailing. To Tod's Court it presents a relatively solid elevation and is lower in height than neighbours. It therefore appears as a secondary form and subservient/ancillary to surrounding houses in views from the street front and Court.”

5.09 The sequence of historic OS Maps included at **Appendix 28** show that Tods Court was originally fully enclosed on its north side and that the rear of 17 George Street was never intended to be viewed from Marine Parade, which largely explains its appearance as a secondary form and subservient/ancillary to surrounding houses in views from the street front and Court. The existing rear elevation presents a largely blank wall facing into Tods Court and adds to utilitarian appearance of Tods Court in views from Marine Parade (**Appendices 24 & 25**).

5.10 The initial response continued;

“A number of the surrounding buildings are listed at Category C, adding to the sensitivity of the area.....”

5.11 An extract from the published by HES on the Pastmap website is included at **Appendix 29**. It can be seen the predominantly listed part of the local conservation area is located to the immediate west and that 17 Charles Street is located in what might reasonably be considered a “buffer zone” between this and the modern housing developments to the immediate east (the buildings facing onto the harbour further to the east are also listed). In this regard, 17 Charles Street is located in an area of varying historical sensitivity.

5.12 Assessment

Regarding the assessment of the potential impact on the local built heritage the initial response from SBC Heritage & Design noted (**Appendix 18**);

“The proposed alterations and extension are not informed by, nor respond to, the historic character of the conservation area nor the traditional form and detailing of the building forming part of the conservation area. The design statement should include analysis of the character of the conservation area and be used to inform the proposals....”

5.13 A copy of the originally submitted design statement is not included within the documentation in the SBC Planning Portal. A revised design statement was submitted on 26th October 2021 (**Appendix 31**). It is my opinion that while the submitted design statement is relatively rudimentary, it is relevant to the level of development proposed, in this instance (**Appendix 31**).

5.14 The assessment continued;

“To the north elevation, the proposed large bifold doors and glazed barrier/Juliet balcony are not traditional features of the conservation area. The dormer window is not traditionally proportioned. These features are located on a prominent elevation visible from the seafront and in relation to Tod’s Court which retains much historic integrity. The building forms a secondary/ancillary ‘backdrop’ at present. The proposed alterations would present incongruous additions that are out of keeping with the conservation area and which would draw undue attention to the building. A traditional sized and detailed dormer and one or two small window openings could be supported on this elevation, but not openings of the scale and design proposed. The elevation should remain secondary to Tod’s Court....”

5.15 The proposed concentration of non-traditional features on the north elevation was specifically addressed in the adjusted proposal by the replacement of the box dormer with two traditional dormers (**Appendices 3 & 6**).

5.16 The assessment continued;

“To the south, the proposed extension is very large and would have a considerable impact on the street scene. It significantly increases the overall scale and prominence of the building, particularly as it rises near to ridge height. Eaves height has been reduced to the left side of the proposed extension (relative to the previous withdrawn application), but only by increasing the width of the extension. This has increased the scale and massing of the proposed extension and results in an asymmetric gable. The scale and particularly ridge height of the extension should be significantly reduced.

5.17 It is my opinion that the originally submitted proposal for the extension to the south was not sufficiently subservient to the main building and that the asymmetric gable was out of character within the context of the conservation area (**Appendix 3**). The scale and massing of the extension was significantly reduced in the subsequently submitted adjusted proposal (**Appendix 6**).

5.18 The assessment continued;

“The design of the west elevation is not in keeping with the character of the conservation area, particularly due to the up-and-over garage at ground floor, the proportions of the elevation, and the inclusion of dormers and rooflights within the same roof plane. Although a feature of the main building, the dormers add further prominence and bulk to the extension. Upvc is generally not characteristic of the conservation area although it is acknowledged the existing are upvc...”

5.19 Again, the proportions of the elevation and the inclusion of dormers and rooflights within the same roof plan were addressed in the subsequently submitted adjusted proposal (**Appendices 4 & 5**). In the latter respect, the dormer elements were removed in the adjusted proposal.

5.20 The assessment in the initial response by SBC Heritage & Design concluded that for the reasons stated, the submitted proposal was not supported in its current form. In this respect, the adjusted proposals were submitted with a view to addressing the concerns raised by SBC Heritage & Design.

5.21 SBC Heritage and Design (response to revised proposals)

The Part III Report includes a further section under the heading SBC Heritage and Design (response to revised proposals): Objection (**Appendix 13**). A copy of the further consultation response is not included within the documentation in the SBC Planning Portal.

5.22 In this regard the Part III Report states;

“No further analysis has been provided of the....character of the conservation area and the designs continue to respond to the historic character of the conservation area and the traditional form and detailing of the building forming part of the conservation area to a limited extent.”

5.23 As noted above, it is my opinion that the submitted design statement is relevant to the level of development proposed, in this instance (**Paragraph 5.13**). The underlying massing, form and materials of the adjusted proposals are certainly informed by and generally reflect the existing character and appearance of this part of the conservation area (**Appendices 4 & 5**).

5.24 The Part III Report continues (**Appendix 13**);

“To the north elevation, removal of the box dormer and replacement with two more traditionally detailed dormers is an improvement, although the alignment of the dormers sit slightly uncomfortably within the overall roofscape. The bifold doors and Juliet balcony are not traditional features of the conservation area although are an improvement from the previous withdrawn proposal....”

- 5.25 As noted above, historically, Tod's Court was originally enclosed (**Paragraph 5.09**). In its present configuration Tod's Court is effectively a prominent gap site that is highly visible in views from Marine Parade and is of a utilitarian character and appearance in this respect (**Appendix 24**). The north elevation of 17 George Street provided a utilitarian frontage within an interior courtyard that was never intended to form part of any view from Marine Parade.
- 5.26 It is my opinion that, while not a traditional feature, the inclusion of the bifold doors and Juliet balcony within the confines of the previously blank elevation is a proportionate and relevant modern intervention which will enhance the character and appearance of Tods Court within its contemporary local context (which includes both traditional dwellings and sensitive modern residential development) (**Appendix 30.4**).
- 5.27 Regarding the extension to the south, the Part III Report states (**Appendix 13**);
- “To the south, the proposed extension has been reduced in width and height from previous, which is an improvement but remains a very large extension to what is effectively the principal elevation of the building. It retains a somewhat suburban character to its detailing and proportions (particularly the west elevation) which is at odds with the conservation area, the main building and that of the building it replaces. Its location at the terminus of views along a number of streets considerably increases its relative impact on this part of the conservation area, compounding the issues raised above.”*
- 5.28 The adjusted design for the proposed two storey extension is consistent with the traditional scale, massing and materials used throughout this part of the conservation area. In terms of the wider street scape, the replacement of the pre-existing single-story utilitarian shed with a two-storey extension will better define the intersection between George Street, George Wynd and St Ella's Place at this location (**Appendices 30.1 & 30.2**). In this respect it will provide a more sensitive interface between the modern developments to the east of George Street (**Appendix 33**) in views from George Street and St Ella's Place (**Appendices 30.1. & 30.3**).
- 5.29 As a necessary functional element the modern up-and-over garage entrance is a proportionate modern inclusion that will not draw significantly more attention than the elevation of the existing utilitarian “lean to” or the larger garage door on the opposite side of George Street (**Appendices 21, 22 & 34**).
- 5.30 Notwithstanding the noted improvements in the adjusted proposal, the Part III Report records the SBC Heritage and Design (response to revised proposals) as an objection.
- 5.31 For the reasons stated, above it is my opinion that the adjusted proposal will have a positive impact on the local area and will preserve and enhance this part of the conservation area.

6.00 SBC Assessment and Recommendations

6.01 Introduction

The Part III Report was the basis of the determination of the Application under powers delegated to the Chief Planning Officer (**Appendices 13 & 19**). Within this section I provide a brief commentary on the assessment and recommendations regarding the impact on the local built heritage contained therein.

6.02 Assessment - Streetscene and Conservation Impacts

Regarding the assessment of Streetscene and Conservation Impacts the Part III Report stated (**Appendix 13**);

“The main component of these proposals is a very large extension that would protrude off the frontage of the existing dwelling, replacing an existing single storey extension. The extension would be wider and deeper than the dwelling's historic narrow gables. The scale and massing of the proposed extension would dominate the principal elevation of the existing dwelling, resulting in a significant adverse impact upon the existing building and by consequence the wider conservation area. Whilst it would be kept below the ridge line of the existing dwelling, the extension would transform the frontage of the dwelling in a manner that could not be described as subordinate.”

6.03 While this description might have been relevant to the originally submitted proposal (**Appendices 3 & 4**), it is my opinion that it is not so in relation to the adjusted proposal (**Appendices 5 & 6**). On the basis of the before and after visualisations attached at **Appendices 30.1 – 30.3**, it is my opinion that the massing and scale of the proposed extension is consistent with the general scale and massing of the conservation area at this location.

6.04 The assessment continues;

“The design character of the proposed extension would be suburban in character due to features such as the proposed integral garage and the proportions of the square ground floor window. These relate poorly to the existing dwelling. Furthermore, whereas the existing dwelling features historic narrow gable depths, the proposed extension's gable would be considerably wider, adding to the dominating scale and mass of the extension and failing to respect the historic character of the host dwelling.....”

6.05 Again, I disagree with this assessment. The adjusted proposal for the extension is clearly subservient to the main house and consistent with the traditional scale and massing of the conservation area at this location (**Appendices 30.1 & 30.2**). The necessary inclusion of the integral garage and a square window is proportionate within this context and does not make the character of the proposed extension “suburban” per se. Indeed it should be considered that the use

of traditional local scale and massing for the adjacent modern development at Marine Place, has not resulted in a "suburban" character that is out of place within the context of the local conservation area (**Appendix 33**).

6.06 The assessment continues;

"Blank walls to the south and east further detract from the character and appearance of the conservation area. Key streetscene views along George Wynd and St Ella's Wynd would be terminated by a large blank elevation and a suburban character elevation respectively. Views to the Category A listed Gunsgreen House from the west of the extension would be particularly impacted. This compounds the respective individual adverse impacts upon the character and appearance of the conservation area resulting from the proposed development. Impacts to the setting of listed buildings would be a less concern but are also important considerations."

6.07 I disagree, the blank south gable elevation of the extension will mirror the blank gable wall of 15 George Street opposite accentuating the axial route into George Wynd and beyond. The view towards Category A Listed Gunsgreen House comes to fruition when George Wynd opens up further to the east (**Appendices 5, 27 & 32**). Similarly, the proposed blank wall at the rear of the extension essentially maintains the existing situation which accentuates the route leading to Marine Parade (**Appendices 27 & 30.4.1A & 30.4.1B**). In this regard the blank walls are consistent elements within the context of the warren of routes through the hinterland of Harbour Road, High Street and Marine Parade (**Paragraph 4.04**).

6.08 Regarding the proposed north elevation of 17 George Street the assessment states (**Appendix 13**);

"To the rear, the design of the two dormers are acceptable individually, however the spacing between them would produce an uncomfortable overall appearance that would not reflect the more traditional alignment seen on the front elevation...."

6.09 It is correct to say that the spacing between the two dormers would be different than the spacing of the dormers on the south elevation of the house. However, it is incorrect to suggest that it is inconsistent with the traditional spacing between dormers in general. The spacing between dormers is traditionally informed by the layout the interior (**Appendix 5**). In this instance the dormers (and Juliet balcony) are specifically placed centrally within the wall terminating the view into Tod's Court from Marine Parade, which further accentuates this as a designed feature within the context of Tod's Court (**Appendices 30.4.2B & 30.4.3B**). In the above respects it is important to note that the dormers at the front and rear of the house will not generally be intervisible (**Appendix 32**).

6.10 The assessment continues;

“Finally, the first floor bi-fold doors are not traditional features of the conservation area but would activate the currently largely blank elevation. On balance, they are considered to be acceptable in principle. The use of black painted railings as opposed to a glass balustrade would reduce the impact of these alterations to the character of the conservation area and could have been required by condition had the application been supported....”

6.11 As noted above (**Paragraph 5.26**), it is my opinion that while not a traditional feature, the inclusion of the bifold doors and Juliet balcony within the confines of the previously blank elevation is a proportionate and relevant modern intervention which will enhance the character and appearance of Tods Court within its contemporary local context (**Appendix 30.4**).

6.12 Conclusion

Under the heading recommendation, in relation to built heritage matters the Part III Report concludes (**Appendix 13**);

“The proposed development does not accord with policies PMD2 (Quality Standards) and EP9 (Conservation Areas) of the Local Development Plan 2016. The proposed development, by reason of its scale, form, detailing and proportions, would not be appropriate for the existing building and would harm the special architectural and historic character and appearance of the Conservation Area.”

6.13 For all of the reasons indicated within **Section 5.00 & 6.00** above, it is my opinion that the scale, form, detailing and proportions of the proposed development (as adjusted), is consistent with the general scale and massing of the part of the conservation area bounded by Harbour Road, Marine Parade and Market Place/High Street and will preserve and enhance the character and appearance of this part of the Conservation Area.

PART D: CASE FOR CONSENT

7.00 Built Heritage Case for Planning Permission

7.01 The reasonable built heritage case for planning permission for the proposed development, on the basis of the above commentary, is summarised below (**Section 4.00**).

7.02 Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and Scottish Planning Policy (Paragraphs 3.01 – 3.03)

In terms of the overarching statutory requirement set out at Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and Scottish Planning Policy, the proposed development will preserve and enhance the character and appearance of the local part of part Eyemouth Conservation Area bounded by Harbour Road, Marine Parade and Market Place/High Street (**Sections 5.00 & 6.00**). It will have no substantial impact on the character and appearance of the wider Eyemouth Conservation Area (**Paragraph 4.09**).

7.03 The proposed development is informed by an understanding of the importance of the heritage asset affected and has been sensitively managed to minimise adverse impacts on the fabric and setting of the conservation area.

7.04 Managing Change in the Historic Environment: Setting (**Paragraph 3.05**)

The assessments included in **Sections 4.00 – 6.00** above respond to general approach set out in Managing Change in the Historic Environment: Setting.

7.05 Local Policy EP9: Conservation Areas (**Paragraph 3.07**)

In terms of Local Policy EP9 Conservation Areas, the proposed development is located and designed to preserve and enhance the special architectural or historic character and appearance of the conservation area and accords with the scale, proportions, alignment, density, materials and boundary treatment of nearby buildings, open spaces and vistas (**Sections 5.00 & 6.00**).

7.06 Local Policy PMD2: Quality Standards (**Paragraph 3.08**)

In terms of Local Policy PMD2: Quality Standards, the proposed development will (**Sections 5.00 & 6.00**);

- have a sense of place based on a clear understanding of the context, designed in sympathy with Scottish Borders architectural styles but does not exclude appropriate contemporary and/or innovative design.
- be of a scale, massing height and density appropriate to its surroundings, and appropriate to the existing building,
- be finished externally in materials, the colours and textures of which complement the highest quality of architecture in the locality and the existing building,
- be compatible with, and respect the character of the surrounding area, neighbouring uses and neighbouring built form,
- be satisfactorily accommodated within the site,
- provide appropriate boundary treatments to ensure attractive edges to the development that will help integration with its surroundings.

7.07 In all of the above respects it is my opinion that the proposed development will be in accordance with the key relevant national and local policy and guidance with regards to the historic built environment.

Appendices