

Speaking for
Scotland's Buildings
AHSS East Lothian Cases Panel,
c/o 14 Leslie Way, Dunbar EH42 1GP
01368 864659 | bill.dodd@yahoo.co.uk



AHSS
THE ARCHITECTURAL
HERITAGE SOCIETY
OF SCOTLAND

Planning and Environment
East Lothian Council
John Muir House
Brewery Park
Haddington
East Lothian EH41 3HA
f.a.o. Julie McLair

Our Ref: 19/20 Whitekirk

by email: environment@eastlothian.gov.uk

22 August 2019

Dear Ms McLair

**Erection of 1 house and associated works, Whitekirk Village Hall Whitekirk
Planning application 19/00781/P**

The proposal is for a new-build house within the Whitekirk Conservation Area, in the vicinity of Whitekirk Tithe Barn (Listed Category A). Whitekirk is important in the heritage of Scotland and East Lothian, other important heritage and environmental assets in the village include the Parish Church (Category A), the scheduled ancient monument of the Pilgrim Houses and the surrounding Special Landscape Area (Whitekirk and Balgone Outcrops). This complex should be considered as a whole (*'The whole of Whitekirk village and its landscape setting are included in the conservation area'*- CA Character Statement).

The East Lothian Cases Panel of the AHSS has visited the site, considered the proposal, examined the Heritage and Planning Statements, and makes the following points in relation to the adopted Local Development Plan (LDP) and Special Guidance.

The Society **OBJECTS** to this application on the grounds that it is incompatible with Council Policies CH1 (Listed Buildings), CH2 (Conservation Areas), DP1 (Landscape Character), DP2 (Design) and DC9 (Special Landscape Areas). It is also contrary to the Conservation Area Statement for Whitekirk and could be considered incompatible with CH4 (Scheduled Monuments),

Our fundamental **OBJECTION** is in terms of CH2. The Heritage Statement claims that the development site *'does not meaningfully add to the archaeological, historical aesthetic or artistic value of the Conservation Area'* (para.7.10). But one of the major objectives of the CA is to maintain the historic balance between Whitekirk and its agricultural and industrial landscape - the quarry is an essential part of this. The informality of the abandoned quarry workings, right on the edge of the village, is a vivid expression of this relationship, enhanced by its wild state. The development will destroy this asset, without conserving or enhancing the character of the CA.

The north-east/northern third of the Conservation Area is largely open countryside lying within Special Landscape Area 16 (Whitekirk and Balgone Outcrops). We note that the definition of 'countryside' includes Special Landscape Areas (see ELLDP, Advice Box 5, p.124), that DC9 applies and *'development should accord with (the) supplementary guidance'*. SLA Guideline E states that development should avoid reducing *'the scale and contrast of the landscape form'* and detracting of *'the natural qualities of the area.'* The proposal extends development outwith the built-envelope of Whitekirk and beyond its traditional limit to the

Chairman: Martin Robertson

AHSS Cases Panels | National Office | 15 Rutland Square, Edinburgh EH1 2BE
0131 557 0019 | nationaloffice@ahss.org.uk | www.ahss.org.uk

north west, into the countryside that is such an important balancing component of the designated Conservation Area and the special landscape character. It affects the scale, contrast and balance of natural qualities, as follows.

The height of the new house exceeds that of the rock outcrops to the east/south-east (see elevation drawing RT/0319/P-07D). The submitted elevations clearly show the house ridge and flue as some 2-3 metres higher than the ridge of the village hall – which acts as a reference point . It will indeed '*protrude above the ridge of the hill*' and **does** affect the natural qualities of the village (Heritage Statement para 7.2). The Heritage Statement judges this intrusion as '*not incongruous*' yet notes that the house ridge and flue will be visible from the church and will be in clear view of the Tithe Barn as seen from the village and the access road.

In terms of CH1 and DP9 (SLA Guidelines), the Heritage Statement claims that '*The experience of the Tithe Barn in views from the churchyard and the visual relationship between the barn and the church will not be altered*' (para.7.10). That the building '*would not compete for prominence in the view, with the Tithe Barn remaining the focus*' (para. 7.21) concedes that there **is** interference, while seeking to minimise its effect. We emphasise that the buildings affected in this case are A Listed, the Tithe Barn is a Listed Building associated with a Scheduled Monument. Policy CH4 may also apply in respect of the setting of the scheduled monument. This is one of the most distinguished CAs in Scotland and the Council will best serve the public interest by resisting any compromise.

In terms of both CH2 and DP1, a marked characteristic is how Whitekirk 's houses and cottages (north of road C136, at the south-east foot of Whitekirk Hill) all nestle down together with ancillary buildings, subservient to the rocky outcrops above. Whitekirk's buildings do indeed display a '*pattern..of historic traditions of status and building hierarchy*' (para.6.33) and this principle strongly contributes to the Conservation Area's character (see character statement). This should be retained – the height of the '*dramatic... landform*' should dominate (SLA 16 Statement of Importance) and only be exceeded by existing higher status buildings – the Kirk, the Tithe Barn. It is notable how the rock outcrops are visible behind these Whitekirk cottages and this natural landform – even where clothed by vegetation, should not be obscured or diminished.

We are convinced that this is **not a suitable site for development**. While the Planning Statement itemises Local Plan policies in support of this proposal, it overlooks the following policies which preclude development in the countryside (see policy reference above, as to the definition of this site as countryside):

Policy DC1: Rural Diversification- The new house is not the restoration or conversion of a vernacular building. It is not a countryside development for agriculture, horticulture, forestry, infrastructure or countryside recreation, or another business requiring a countryside location. It does not meet the local plan '*...New homes in the countryside may also be supported in certain circumstances such as conversions of attractive rural buildings or affordable homes to meet local needs.*' (ELLDP, para 5.1)

The normal policy presumption is against new housing in the countryside...' (**Policy DC4: New Build Housing in the Countryside**).

In terms of DP2, the Society is not commenting on the proposed house design, as we are convinced that development should be ruled out in principle. We do, however, have many reservations about the quality of the design submitted, for example new build should relate to the existing settlement pattern, be of typical form, and use traditional materials, components and styles (see DP2, Policy CH2 and SLA 'Guidelines for Development').

Accordingly, the AHSS objects to the proposal

Yours faithfully,

The AHSS East Lothian Cases Panel

c.c. Historic Environment Scotland steven.robb@hes.scot
AHSS National Office nationaloffice@ahss.org.uk