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Our ref: HGG/A/TC/612
Our Case ID: 201101789
Your ref: 11/01083/LBC

23 September 2011

Dear Sirs

**Planning (Listed Buildings and Conservation Areas)(Scotland) Act 1997
Perth City Hall, King Edward Street, Perth**

With regard to John Russell's email of 12 September (considering the applications for demolition of Perth City Hall and creation of new public square) we now have a clearer understanding of the Council's thinking behind these proposals thanks to the additional information and further narrative provided.

It is clear over the years, when the future of Perth City Hall has been considered, that a lot of work has gone into examining the future of the functioning of the space in which it sits. However, we would have expected to see a narrative that commences with the performance of Perth as a whole rather than to focus on dealing with one site.

The narrative, while useful, does not demonstrate in a coherent way why the creation of a square in the location proposed is essential for Perth and delivering its continued economic growth. The key question of 'what your Council needs to do to help Perth perform better' appears to not have been addressed therefore we consider the provision of essential significant public benefits has not been adequately identified.

The basis of the options appraisal "to utilise Perth and Kinross Council's property assets in such a way that delivers 'best value' for Perth and the local authority area." means it is a document written for a property owner considering what they are going to do with one individual site. In this instance, you seem to have focused on your own interests as property owner with a limited range of options and not investigated the full range of options for improving the performance of Perth. This would include wider options for the listed building and contributions to the wider economic performance of the town centre as a whole.



If your Council is minded to grant listed building consent, we will need the case for essential significant public benefits to be set out clearly and you will need to be satisfied with the material required to back it up. As the case relies on the argument that this proposal provides significant public benefits, we have not queried assumptions regarding the other SHEP tests. If the public benefit argument does not carry, this will require to be revisited.

If what we are asking for is unclear please contact me on 0131 668 8919 and I will be happy to discuss further.

Yours faithfully

Leigh Johnston
Heritage Management Team Leader, Historic Buildings North