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Dear Ms McCrone,

Consultation on Proposal to List Inner-City Multi-Storeys, Aberdeen

Thank you for your consultation dated 9th October 2019 on the proposed listing of the city centre multi-story blocks noted within your letter. The proposed listing is of interest to the council as a planning authority as well as being of interest to the council as the landlord of over 22,000 properties in the city, including 59 multi-stories. This response, has been drafted on behalf of the council as the relevant planning authority

We note the recent interest Historic Environment Scotland is taking in Aberdeen's Post War Architecture. This letter does not constitute an objection to the current consultation process, however if Historic Environment Scotland are minded to list these buildings then the following points should be taken into consideration.

- 1. Statements of Special Interest (list description):** The Statements of Special Interest to be included in the list descriptions for these buildings needs to be clear on why exactly these buildings are being listed. If these buildings are to be listed the statements should detail clearly and exactly what is special about the buildings (e.g. structure, external features) in order to make assessing any future proposals for these buildings as straight forward as possible thereby enabling us to deal effectively with applications from the council as the owner and landlord of many of the properties affected by the proposed listing. As per your own Interim Guidance on the Principles of Listed Building Consent, "knowing what is important about a building is central to an understanding of how to protect the special interest.". Statements of Special Interest tailored to each individual block would also be welcome.

2. **Setting:** Further to the point above, the Report of Handling gives a general overview of the setting for all the blocks but does not go into detail regarding each individual one. If HES are minded to list these buildings the analysis of the setting of each individual block should be expanded on in the list descriptions' Statements of Special Interest. Having clear statements of special interest detailing the contribution each block makes to the surrounding cityscape including key views (short and long) is imperative to ensure future applications for development in the surrounding area can be assessed correctly and the contribution these buildings make to the wider cityscape is given due consideration.
3. **Extent of Listing (1):** As stated in the Report of Handling (sections 3.2 pg.3-4, 2.1.1 pg. 9-10 and section 3 pg. 12-13) the surrounding landscaped areas to these buildings are key elements of the overall design and contribute to the special character of these buildings. If this is the case, then it would be worth considering including these in any formal listing resulting from this consultation. Furthermore, including maps showing the extent of the listing in the list descriptions would be welcome to avoid ambiguity over what is covered by the listing.
4. **Extent of Listing (2):** In addition to seeking a better understanding of the aspects of the buildings which Historic Environment Scotland are seeking to protect, we would also welcome a better understanding of the rationale for selecting 8 buildings to list. Whilst fully accepting that buildings of this nature have been listed throughout Scotland, we can find no evidence of to support a listing of this many buildings of this type in one location.
5. **Nature of the listing:** We would highlight that in a number of cases throughout England, decisions have been made to list similar properties as Grade 2, the equivalent of Category B in Scotland. We would be interested in whether Historic Environment Scotland have given any consideration to listing these buildings at Category B rather than the proposed Category A.
6. **Administering and Determining Planning Applications:** The proposed listing will cover 8 large blocks of flatted accommodation over 5 sites in the city centre, resulting in hundreds of properties being subject to the possible requirement for Listed Building Consent. This will likely lead to an increase in Listed Building Consent applications which would result in added pressure on the already strained financial and staff resources of the Council planning service.

As you are aware Historic Environment Scotland are a statutory consultee and your comments are treated as a material consideration in various types of planning applications (Listed Building Consent, Planning Permission, Conservation Area Consent etc.). We welcome these comments and every effort is made to take the comments on board. Negotiating these changes can on occasion be a complex and time-consuming process.

We appreciate that given the nature of these buildings a somewhat more flexible approach could be taken with regard to Listed Building Consent. However statutory regulations governing works to listed buildings will still need to be adhered to. As you are aware this is the responsibility of the local

authority. Any flexible approach will need to be given due consideration by the Council planning service to ensure we are not at risk of any future legal challenges or setting precedents for future Listed Building Consent applications. We welcome further discussions with you on this matter in order to ensure the Listed Building Consent process for any proposed development can be delivered in an efficient and timely manner from a planning service perspective, whilst also ensuring that the council, as a landlord, can still undertake any necessary alterations and adaptations, which do not adversely affect the special interest.

7. **Local Development Management Guidance Note:** If the proposed blocks were listed the Council Planning Service would look to put into place a brief guidance note covering general our approach to Listed Building Consent and Planning Permission applications for the building. We would welcome input from your Designations and Heritage Management sections on this.

If Historic Environment Scotland are minded to list these buildings it would be worth considering postponing the formal listing until the points above can be considered fully in partnership with the planning authority.

In addition to the above, the following points should also be considered

8. As there are a number of post war buildings being listing in Aberdeen and the wider country, a Managing Change guidance document focusing on post war buildings would be welcome to aid the management of these historic assets.
9. Section 2.1.1 of the Report of Handling states *'The design of the Aberdeen inner-city blocks is an outstanding example of the modernist architecture of the period represented externally by the monumental side wall frames and sculptural concrete detailing and internally in its innovative plan'* (pg.9). More of this detailed analysis would be welcome as it would make clear exactly what features make these buildings special.
10. Section 2.2.1 of the Report of Handling (pg. 10-12) gives some contextual analysis but more detail, especially from a Scottish context, would make it clearer how these buildings compare to other similar buildings around Scotland.
11. The third paragraph of section 2.1.2 of the Report of Handling (pg.10) mentions Union Square. This should presumably be Castlegate.
12. The last paragraph of section 2.1.1 of the Report of Handling (pg.10) should mention the painting of the cladding.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Beattie', written in a cursive style.

Gale Beattie

Chief Officer – Strategic Place Planning

Cc Barbara Cummins, Director of Heritage, Historic Environment Scotland
Dawn McDowell, Deputy Head of Designations, Historic Environment Scotland
Mike Scott, Senior Heritage Management Officer Historic Environment Scotland