



Your Ref:  
Our Ref: SB/  
Contact: Stephen Booth  
Location: Marischal College

Date: 22 January 2020

**FAO Elizabeth McCrone**  
Head of Designations  
Historic Environment Scotland  
Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

**Corporate Landlord**  
Aberdeen City Council  
Marischal College  
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Aberdeen AB10 1AB  
  
[www.aberdeencity.gov.uk](http://www.aberdeencity.gov.uk)

Dear Ms McCrone

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

#### **Case IDs:**

**300030647 (Gilcomstoun Land)**

**300030683 (Porthill and Seamount Courts)**

**300030684 (Virginia and Marischal Courts)**

**300030688 (Thistle Court)**

**300030690 (Hutcheon and Greig Courts)**

**<http://portal.historicenvironment.scot/decision/500002119>**

Thank you for inviting Aberdeen City Council (the Council) to comment on your proposals to introduce Category A listings for a number of multi-storey buildings across Aberdeen City Centre. The proposed listing is of interest to the Council both as planning authority and as corporate landlord for over 22,000 properties in the city, including 59 multi-stories. This response has been drafted on behalf of the Council as a corporate landlord in the city.

I would also like to thank you and your team for taking the time to meet with me last week to discuss the properties in more detail and also for discussing the listing with elected members of the Council.

**Following these meetings I now advise you that Aberdeen City Council, as the majority owner of homes and structures within the properties at Gilcomstoun Land, Porthill Court, Seamount Court, Virginia Court, Marischal Court, Thistle Court, Hutcheon Court and Greig Court, formally objects to any proposal to list these properties.**

The basis of our objection to the listing proposal for the properties is centred around 3 core themes as follows:-

- a) The timing of the proposed listing in advance of the full findings from the Grenfell inquiry being released**

At this time there are significant inquiries and reports ongoing following the tragic events at Grenfell Tower in London. Whilst multi-storey buildings in Scotland have been constructed to different standards than those in England, these enquiries are ongoing and we consider it prudent for all parties, including Historic Environment Scotland, to understand the outcomes from these inquiries in order that all parties can take a considered view and respond to any future recommendations that may arise from either the enquiry, or from the Ministerial working group on buildings and fire safety, which has been established in Scotland.

<https://www.gov.scot/groups/ministerial-working-group-building-and-fire-safety/>

Whilst Category A listing may not necessarily restrict any future works that may be required, we are concerned that it may result in a requirement for additional applications and negotiations over those works which will result in delays and increase the costs and deliverability of any proposals Aberdeen has a disproportionately high number of multi-stories reflecting the housing solution progressed post-war in the city and therefore will be disproportionately affected by recommendations from the national inquiry arising from Grenfell.

We would suggest that any decision on listing the Aberdeen properties in question be deferred until there is an outcome to the national inquiry.

#### **b) Special architectural or historical significance**

The report of handling is not clear on the detail around specifically what features contribute to the buildings being 'outstanding examples' of special architectural or historic interest and particularly why all 8 are being considered rather than testing a particular example first. Without this information, it is difficult for us to formulate an opposing view to the grounds for "special interest". The absence of this information has compromised our ability to appeal.

#### **c) Current challenges with properties**

Investigations being undertaken by your organisation are timely in so far as the Council has been undertaking work itself over the last few months to enable to plan the future of the buildings in question and understand the level of investment required to allow them to continue to provide the type and standard of accommodation we would expect our tenants to experience over the coming years.

Due to particular issues with balcony balustrades, where repair and improvements must be undertaken, much of this research has been centered around Gilcomstoun Land. Given the similarities in construction and detailing, we would anticipate the outcomes being replicated across the property portfolio in question.

Whilst there may be a degree of flexibility in the future should the buildings be listed, you should be aware of the current challenges the buildings have. Many of these are likely only to be resolved with significant alterations to the building fabric and aesthetics. These challenges include, but are not limited to:-

1. Structural defects to façade, including balcony fixings;
2. Poor thermal performance of existing building fabric;
3. Substandard heating, and energy performance;
4. Failing to meet changing compliance requirements such as the Energy Efficiency Standard for Social Housing (ESSH);
5. Structural limitations of existing structure; including thin floor slabs, low ceiling and challenges with imposing additional design requirements to existing slabs;
6. Fire and life safety risks, one main stair core and external balcony egress route;
7. Layouts not meeting homes for varying needs;
8. Layouts not sustaining a change of demographics addressing aging population;
9. Layouts are not wheelchair accessible.

As discussed, the Council, as a landlord, has undertaken significant work around Gilcomstoun to consider the challenges faced by maintaining these properties to an acceptable and accessible standard. In our conversations you have indicated a strong desire to work with the Council to understand the issues, policies and works that may be considered to resolve them. We would suggest that consideration is given to this and further workshops take place to discuss these issues prior to any decision being made in relation to a potential listing.

In addition to our appeal, we seek further clarification from Historic Environment Scotland on two further points:

Firstly, we seek clarification on the rationale for listed all eight buildings over the five sites simultaneously. We consider it would be prudent, for example, to delay listing until all environmental factors are understood and one example could be then thoroughly tested in partnership with Historic Environment Scotland. This would allow all parties to be fully cognisant of all issues relating to actual listing and subsequent management of the buildings before a final decision is made.

Secondly, we seek clarification on the extent of consultation with residents in the affected properties which Historic Environment Scotland has undertaken and whether any wider public consultation has been undertaken, specifically with Aberdeen residents, as to the architectural or other interest in the properties.

I trust the above clearly outlines the concerns of the Council and will be given your full consideration prior to any decision on a listing being made.

I would be grateful if, in response to this letter, you could set out how Historic Environment Scotland will consider the representation being submitted by the Council before reaching a decision to list and who the parties are involved in the decision making by Historic Environment Scotland.

Yours sincerely

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

**Stephen Booth**  
Corporate Landlord