



**By email to: AnScott@aberdeencity.gov.uk**

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Our case ID: 300040362

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Dear Ms Scott

### [Proposal to List Inner-City Multi-Storeys, Aberdeen: Council's Capital Programme Committee Objection to Listing](#)

Thank you for your response of 24 January to our Chief Executive, Alex Paterson, about our consultation on the proposed listing of the eight multi-storey blocks of flats in Aberdeen. I am replying as I am responsible for decisions about listing. I am sorry for the time it has taken to respond because of interruption to our normal business caused by Covid-19. We have, however, maintained a positive dialogue with your planning and corporate landlord officials to keep them informed about the case.

I note your opposition to the listing on behalf of elected members. We've responded separately to the consultation responses from your Corporate Landlord and Strategic Place Planning officers. I attach copies of these letters and our summary report of the consultation for your information.

You raised concerns about our role in the process of listing. We, and our predecessor bodies, have always been responsible for listing in Scotland. This is set out in law and was last subject to public scrutiny in 2014 as part of the Historic Environment Scotland Act 2014. How we take decisions about listing is published on our website at <https://www.historicenvironment.scot/advice-and-support/applying-for-consents/how-we-take-decisions-on-designations-and-casework/>.

We take our responsibility seriously and a key part of this is making our decision-making open and accountable by publishing our casework on our website. This has been further strengthened by the introduction in 2015 of a legal right of appeal against listing. Appeals are made to the Scottish Government's Planning and Environmental Appeals Division and can be made on the grounds that the building is not of special architectural or historic interest and should be removed from the list.



Our role as the lead public body established to investigate, care for and promote Scotland's historic environment means that there will always be challenging decisions to take about listing buildings. These decisions are taken in the public interest for the people of Scotland. The criteria we use to make these evaluations was developed during a dialogue with the people of Scotland in 2017 which was followed up with a public consultation last year.

Decisions about which buildings become listed will not always be popular and can often be controversial. This is particularly true when we look at listing buildings which have been built more recently. One of the biggest growing areas of our work are applications from people asking us to look at listing more modern buildings. The proposal to list the Aberdeen Multis came from a group of residents who were concerned about the future of their buildings. They prompted Professor Miles Glendinning, of the University of Edinburgh, to propose the buildings for listing to us.

It is our view that listed buildings shouldn't just represent the history of the wealthy and elite, they are for everyone. It's our role to champion all of Scotland's heritage from all periods of time and for all types of people and listing high-quality modern buildings is a part of that.

In the case of the Aberdeen flats they are among only a handful of buildings of their age and type which will ever be listed across Scotland. There are three other similar buildings already listed in Glasgow and Edinburgh and with the addition of the eight buildings in Aberdeen it is likely that the total number of listed multi-storey housing built around the 1960s will not exceed these eleven buildings. For a building type which measured in the high hundreds across Scotland (863 in total) this is a very small number with which to represent the huge changes which were taking place in town planning, housing and society in our towns and cities in the post-war period.

Having said that, we are also acutely aware of the implications of listing and the concerns this listing has raised for residents and your council. There are a lot of myths and misunderstandings about listing, and we have taken care to ensure that accurate information about the implications has been made available to residents. You can read more about the consultation work we did and what people told us in our consultation report which is available on our website and I also enclose a copy for you.

All listed buildings are different and how they are looked after and what changes can be made to them is also unique to each building. We have been clear from the beginning of looking at the flats that the inside of the buildings is of less interest, and that it is how they look from the outside that is important. You note that the listing will place a burden on yourselves and tenants in terms of finance, maintenance and flexibility. I am not clear where the evidence is for this statement. Like-for-like repairs and routine maintenance do not require listed building consent and can proceed as they normally would regardless of the listing. We have outlined our willingness to work with your council on any future plans for the buildings and have supported the planning authority in producing a listed building consent guidance note for residents. I understand that this is currently in draft



form and will be presented to the Planning Committee in the New Year. It's important to us that these buildings continue to be used and to be homes which are fit for purpose. We do not see listing them as being incompatible with those aims. We have provided more detail about these issues in our enclosed reply to your Corporate Landlord and planning officers.

You ask us to delay a decision about listing until the risks and challenges of listing have been more fully explored. The purpose of listing is to identify buildings which are of 'special architectural or historic interest'. From the work we have carried out we consider that the multi-storey flats meet this legal requirement. We have worked with your council and residents to explain what listing means and we hope to continue this dialogue. Issues about managing change to the flats are considered through listed building consent, the same as any other listed building. We don't see that there are any exceptional risks or challenges here to delay a decision indefinitely. Initiatives that we would like to explore further include a pilot study to research how to make the flats more energy efficient and working with your strategic place planning colleagues on a conservation management plan for the flats.

Having taken into account the comments made to us, including the responses from residents, we consider that the Multis continue to meet the criteria for listing. However, we don't intend to take a final decision on the proposal until January 2021 and we'll let you know as soon as that decision has been taken. In the meantime, if you wish to discuss this with us, please contact Elizabeth McCrone, Head of Designations, on 0131-668-8760 or [Elizabeth.McCrone@hes.scot](mailto:Elizabeth.McCrone@hes.scot).

Yours sincerely

Barbara Cummins | Director of Heritage

Encs.