Dear Gale Beattie

Proposal to List Inner-City Multi-Storeys, Aberdeen (Gilcomstoun Land, Porthill Court, Seamount Court, Virginia Court, Marischal Court, Thistle Court, Hutcheon Court and Greig Court)

Thank you for your response of 24 January about our consultation on the proposed listing of the eight multi-storey blocks of flats in Aberdeen. Thank you also for meeting with my colleagues on 12 November 2019 when you discussed the points raised in your response. 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, been pleased to continue a positive dialogue with you and your corporate landlord colleagues about the case.

I note you do not object to the listing and the consultation process but as the relevant planning authority you have raised several points which I have responded to below. We’ve responded separately to the consultation responses from your Chief Executive and Corporate Landlord officers. I attach copies of these letters and our summary report of the consultation for your information.

You note concerns about managing listed building consent both in terms of your resources and because these buildings differ in design and materials from more traditional listed buildings. You have also asked us to consider providing longer listed building records with more detailed analysis. You also request more guidance from us about managing change to post-war buildings. I’ve set out our response to your points below.

Statements of Special Interest (1)

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 multis meet this requirement.
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. This is because of their outstanding architectural quality which was unusual as most of the schemes built during the post-war period were designed in bulk and put up as part of package deals supplied by national house builders. In our research, we have found that Aberdeen has produced some of the best of Scotland’s multi-storeys ever built and which are also comparable to important schemes located elsewhere in the UK. Designed and built as part of the same programme of public housing, led first by City Architect, George Keith and completed by Tom Watson, all eight buildings identified in our review are of equal merit for listing.

There are only three other similar buildings already listed (at category A) 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. We think the assessment we provided you in consultation sets out why these buildings are of special interest and we have ensured that these reasons are made clear in the draft listed building records for each of these sites, tailoring them where needed.

**Setting (2)**

The description of the setting in our report of handling will only mention the essential characteristics of that setting in relation to their prominence in a built-up urban townscape with a layering of building types and dates largely ranging from the late 18th century to the present date. Setting is examined in relation to whether the buildings meet the criteria for listing, not to help to determine future listed building consent applications. We don’t think that it is appropriate to provide detailed descriptions or examination of key views both short and long to each site as this type of analysis is not relevant to a decision to list. It will also rapidly become out of date as the city changes. It would be more appropriate for this to be considered when there are actual planning proposals to analyse.

However, we have made it clearer in the draft listed building records what is covered by the listing. Unless elements are specifically mentioned in the statutory address for each block they will not be listed. The car park and parade of shops in the grouping of multis in the Gallowgate will be listed.

**Extent and Nature of the Listing (3, 4 & 5)**

When comparing the eight multis proposed for listing in Aberdeen with other buildings of their type in Scotland, we have found they are among the best within the city of Aberdeen and in Scotland and are now rare survivals. High quality schemes such as these were built in Scotland’s largest cities, but we know of only two other sites of this scale and quality which now survive in Glasgow (at Anniesland) and in Edinburgh (in Leith). As described in our report of handling (pp. 4-5), these buildings in Aberdeen were
exceptional for the period because they were not like the increasingly ubiquitous factory-made system-built schemes that were erected in all of Scotland’s major urban centres. The level of detail both in elevation and in plan applied to the buildings in Aberdeen was considerable and was inspired by some of the best social housing schemes in the UK and Europe.

Added to this design interest, these eight multis are now rare survivals. Although, erected within a 20-year period, Aberdeen’s city architects designed these eight buildings as part of comprehensive redevelopment programme within the city, knitting them carefully into the existing and new urban fabric. The result is a rare collection of buildings of similar style and quality of design that are important both individually and as a group as representations of a programme of public sector social housing not rivalled elsewhere in Scotland. Adding to this understanding of the special interest, is the fact that there has been little later alteration to each of these blocks which means that we considered category A to appropriately reflect their level of importance.

 Administering and Determining Planning Applications, and Management Guidance (6 & 7)

You mention the added pressure on your council’s resources to administer the number of potential applications that could ensue following a listing which will affect around 839 households of which a quarter are in private ownership. I have looked into the most comparable site which is in Leith in Edinburgh (Cables Wynd House and Linksview House) to allay your concerns here. Since listing in January 2017, there have been only three listed building consent applications for these two buildings for telecommunication installations. These blocks have over 300 households. We therefore do not anticipate a substantial increase in your casework as a result of this listing, but we are happy to offer more support and advice on the types of works which may or may not require listed building consent.

We have explained from the beginning of the listing review that the inside of the buildings is of less interest and that it is how they look from the outside that is important. We have also made it clear that that like-for-like repairs and routine maintenance do not require listed building consent and can proceed as they normally would regardless of a listing. We have outlined our willingness to work with your council on any future proposals for the buildings. 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 remain keen to continue to work with you to help further with developing the draft guidance note you are working on for residents.

 Additional points (8, 9 & 10)

It’s important that managing change to the multis should not be treated any differently to managing other listed buildings. While post-war architecture may look different and use other materials from older types of heritage, the policies and principles are the same as for any other listed building. However, in response to the increase in the number of
proposals from the public for us to list post-war buildings and the subsequent increase in these types of buildings being listed, we will be including more case studies of post-war buildings in our Managing Change Guidance documents. We are in the process of drafting a new Managing Change guidance document on Listed Building Consent which will address how and when consent should be applied which we hope will be a useful document for you to refer to in your decision-making.

We have outlined our willingness to work with you and your planning colleagues on any future plans for the buildings and have already begun this by working with you to help you to produce a 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 some of these issues in our enclosed reply to your Corporate Landlord officers.

Our draft listed building records for each site (which have been forwarded to Ross Wilson and Claire McArthur) address the individual circumstances of the blocks and contain the reasons for listing as outlined in the report of handling prepared in consultation and with including additional narrative which specifically addresses your questions about the architectural and historic interest which we think qualifies the buildings for listing. We have also amended the inaccuracies pointed out in your response.

We are grateful for all your comments and contributions to the listing process and our consultation. We look forward to ongoing discussions in partnership with your council. At the same time, we will be discussing with your Corporate Landlord and Aberdeen City Heritage Trust a programme of retro-fitting for energy performance on the tower blocks, with the aim being to undertake research to improve the energy efficiency of the multis.

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 and we’ll let you know as soon as that decision has been taken.

Yours sincerely

Elizabeth McCrone | Head of Designations