

# **PE2105/F: Safeguard Scottish Listed Buildings at risk of unnecessary demolition**

## **The Architectural Heritage Society of Scotland written submission, 21 May 2025**

The Architectural Heritage Society of Scotland (AHSS) works across Scotland, supporting the appropriate use and adaptation of historic buildings, towns and landscapes. Our strapline is 'Speaking for Scotland's Buildings'. We want all Scotland's citizens to discover more about Scotland's built heritage and take an active part in its preservation. We are committed to encouraging public understanding and appreciation and the protection of Scotland's historic built environment. We campaign for the maintenance of Scotland's built heritage and the continued use of existing buildings and adaptive re-use where appropriate.

We write in support of PE2105. The AHSS echoes SAVE in fully recognising the paramount importance of making dangerous buildings safe. However, we consider that the emergency powers set out in the Building (Scotland) Act 2003 can allow for the demolition of listed buildings without sufficient evidence to justify the decision. We note the conflict with planning safeguards in the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. We note that there is a disparity between the requirements set out in existing legislation and guidance regarding carrying out urgent public safety works to a listed building, and how this is executed in practice.

The AHSS regional cases panels examine applications for listed building consent and for the demolition of un-listed buildings in conservation areas and we observe situations where buildings are being demolished without evidence that the proper procedures are being followed. Decisions are being taken without careful assessment.

SAVE listed the following:

- Ayr Station Hotel
- ABC Cinema, 292-332 Sauchiehall Street, Glasgow
- Braemar Lodge Hotel, Glenshee Road, Braemar, Aberdeenshire
- Brown Institute, 41 Canal Street, Renfrew
- TA Building, 76 High Street, Paisley

We also note the following:

- Carsebridge House, Alloa
- Africa House, Lundholm Road, Stevenston
- India Buildings in Bridge Street, Glasgow
- George Christie Memorial Clock, Stirling

The AHSS considers that it is essential that structural engineers with proven expertise in the conservation of historic buildings are involved in assessing whether a building can be made safe.

The Conservation Accreditation Register of Engineers (CARE) is a published list which identifies civil and structural engineers skilled in the conservation of historic structures and sites. The register is run jointly by the Institution of Civil Engineers and the Institution of Structural Engineers to identify engineers who have demonstrated their skills in the conservation of historic structures.

Local authorities seldom have CARE qualified engineers within their organisations and so will have to commission the necessary reports. It is worth thinking of a medical analogy – if you have cancer you expect to be cared for by an oncologist, not an orthopaedic surgeon or ‘bone doctor’. Thus with historic buildings – building must be assessed by an appropriately qualified specialist. Heras or similar fencing can be used to isolate the public from the dangerous building until the building has been assessed and the procedures set out in the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 have been followed.

A change in mindset is required, including government funding, to under-write local authority initiatives to ensure that owners repair buildings before they become dangerous.