

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

## **Petitioner written submission, 17 June 2025**

Thank you for the Committee's most recent consideration of SAVE Britain's Heritage's Petition PE2105 to safeguard Scottish Listed Buildings at risk of unnecessary demolition at your meeting on 4 June 2025.

Ahead of the Committee's next consideration of the petition on 18 June, and in light of the insightful roundtable session convened on the topic earlier this month, we wish to share further comments to assist the ongoing consideration of the petition.

### **Our call**

SAVE's petition calls for a minimum evidence requirement and enhanced policy controls to prevent the unnecessary use of emergency public safety powers to demolish listed buildings.

To stop the needless demolition of Scotland's finite resource of historic, listed buildings, it is our view that there needs to be a mandatory requirement for local authorities to engage the expertise of a conservation accredited engineer in all cases involving listed buildings. We consider that this would support local authorities to reach a fully evidenced and informed decision when considering the demolition of part or all of a listed building under the emergency powers in the Building (Scotland) Act 2003.

The minimum evidence and processes required by local authorities before making emergency decisions on the demolition of listed buildings needs to be clearly articulated in enhanced policy guidance.

### **Why it's important**

In our written submission dated 31 January 2025, we highlighted five cases in which demolition works to a listed building were carried out without robust justification, such as structural evidence provided by a conservation accredited engineer. This includes very high-profile cases such as Ayr Station Hotel in South Ayrshire, and the ABC Cinema in Glasgow. The Architectural Heritage Society of Scotland have since identified a further four cases where buildings have been demolished without evidence that the proper procedures had been adhered to, as set out in both national legislation and guidance.

These cases represent a national issue in which the decision-making process involving the demolition of listed buildings under emergency powers is falling far short of good practice as set out in national legislation and guidance, such as the requirement to prove that any emergency works carried out were limited to the minimum measures necessary.

Without consulting a conservation accredited engineer who has the appropriate expertise and experience to structurally assess a historic building of special

importance, the ability to determine the minimum works needed to protect both the public and the building is severely undermined, and the requirements set out in national legislation and guidance cannot be met.

We are not aware of any provision within national guidance which sets out the need to engage a CARE accredited conservation engineer in cases involving listed buildings.

The recently published guidance note, '[Assessing historic assets that are proposed to be demolished or partially demolished](#)' (March 2024) by the Conservation Accreditation Register for Engineers addresses a gap in which there was “no guidance for chartered engineers who are requested to report on historic structures” (p. 20). It is our view that this gap in policy guidance, particularly on how to justify any demolition of a listed building which might be deemed necessary, extends far beyond that for chartered engineers and needs to be urgently addressed.

SAVE would be pleased to provide further information regarding our petition including, if the Committee so wishes, giving oral evidence.