

Citizen Participation and Public Petitions Committee  
Wednesday 18 June 2025  
11th Meeting, 2025 (Session 6)

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

### Introduction

**Petitioner** Lydia Franklin on behalf of SAVE Britain's Heritage

**Petition summary** Calling on the Scottish Parliament to urge the Scottish Government to set a minimum evidence requirement to prevent unnecessary use of emergency public safety powers to demolish listed buildings.

**Webpage** <https://petitions.parliament.scot/petitions/PE2105>

1. The Committee last considered this petition at its meeting on 4 June 2025. At that meeting, the Committee heard evidence from:
  - Hazel Johnson, Director, Built Environment Forum Scotland
  - Professor Gordon Masterton, Chair, Institute of Civil Engineers Panel for Historical Engineering Works
  - Laura Shanks, Chair, Local Authority Building Standards Scotland
2. The petition summary is included in **Annexe A**.
3. The [Official Report of the Committee's last consideration of this petition will be published on the petition history webpage](#).
4. The Committee has received a new written submission from Built Environment Forum Scotland which is set out in **Annexe B**.
5. [Written submissions received prior to the Committee's last consideration can be found on the petition's webpage](#).
6. [Further background information about this petition can be found in the SPICe briefing](#) for this petition.
7. [The Scottish Government gave its initial response to the petition on 8 July 2024](#).
8. Every petition collects signatures while it remains under consideration. At the time of writing, 3,896 signatures have been received on this petition.

## **Action**

9. The Committee is invited to consider what action it wishes to take.

**Clerks to the Committee**  
**June 2025**

## **Annexe A: Summary of petition**

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

#### **Petitioner**

Lydia Franklin on behalf of SAVE Britain's Heritage

#### **Date Lodged**

6 June 2024

#### **Petition summary**

Calling on the Scottish Parliament to urge the Scottish Government to set a minimum evidence requirement to prevent unnecessary use of emergency public safety powers to demolish listed buildings.

#### **Background information**

The emergency powers in the Building (Scotland) Act 2003 can, in our view, allow for the demolition of listed buildings without sufficient evidence to justify the decision. This is in conflict with planning safeguards in the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. The following policy controls are needed to address this loophole in legislation and to ensure listed buildings (LBs) are not exposed to unjust demolition:

1. Enhanced policy guidance on the minimum evidence and processes required by local authorities before making decisions on the demolition of LBs under emergency powers.
2. A mandatory policy requirement for local authorities to engage with conservation accredited engineers in all cases involving LBs.

## **Annexe C: Written submission**

### **Built Environment Forum Scotland written submission, 5 June 2025**

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

I am grateful to you and the Committee for inviting me to represent Built Environment Forum Scotland (BEFS) at yesterday's round table evidence session on Petition PE2105: Safeguard Scottish Listed Buildings at risk of unnecessary demolition.

I hope the session proved useful to you and the Committee as you consider next steps. In reflecting on the various discussions and exchanges, there is one further point I would like to add to those made in BEFS pre-circulated statement and my contributions to the evidence session. This concerns the potential provision of additional guidance for local authorities on decision-making processes in the demolition of listed buildings.

BEFS Members, comprising 40 organisations in the sector including professional bodies, national charities, local heritage trusts and funders, lack optimism about the value of additional guidance here. The two central concerns are: public bodies cannot be guaranteed to pay sufficient attention to optional guidance in circumstances where they are already hard-pressed for time and resources; and additional guidance may add unhelpful complexity to an already crowded landscape of policy and advice on planning.

In line with the main argument in our statement, BEFS would prefer a resource or legislative action that enables public bodies to access the right skills at the right time in order to reach high-quality and comprehensive decision-making outcomes about whether to approve a listed building for demolition.

BEFS would be appreciative if this additional submission could be added to our previous written and oral evidence. I would be happy to elaborate further if helpful. I am again thankful to the Committee and Clerks for facilitating BEFS participation in this important discussion.