

Development Management
The Environment Service
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

Our Ref: **1311**

21st July 2011

Dear John Russell

**Re: 11/01083/LBC PERTH CITY HALLS, KING EDWARD STREET, PH1 5UG
& 11/01082/FLL Demolition of City Halls and construction of a new City Square**

The Trust has examined the applications for the above and wishes to comment as follows:

The Trust wishes to **object** to this application.

Demolition of a Category B-listed building

Scottish Ministers' Scottish Historic Environment Policy (SHEP) sets out clear criteria for the assessment of applications for demolition of a listed building. This policy requires applicants to provide evidence to show that:

- a. the building is not of special interest; or
- b. the building is incapable of repair; or
- c. the demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or
- d. the repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period.

The applicant addresses these points in the 'Rationale to Demolish' document. Taking each point in turn:

a. the building is not of special interest

The City Halls were listed at Category B in 1972. The building has not been significantly altered since then so it is considered that the special interest remains intact. The Trust would recommend that a heritage report should be prepared which charts the history of the building, its development within the context of the growth of the historic burgh and how it may have changed over time, its significance and contribution to the townscape.

b. the building is incapable of repair

The building is in a reasonable physical condition and not considered to be incapable of repair and reuse.

c. the demolition of the building is essential to delivering significant benefits to economic growth or the wider community

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Often this test relates to major infrastructure projects and in practice, the applicant would have to prove that significant benefits to economic growth or the wider community could not be realised without the demolition of the building.

The applicant argues that the demolition and use of the site as a civic square could generate potential benefits to the economy in the region of £2M. They also suggest that demand for the type of small retail use that could be accommodated in the current form of the halls and that demand for a cultural development is 'undefined'.

The Trust would suggest that there is a lack of robust evidence to demonstrate beyond doubt that there are no other uses for the building which could provide similar or greater benefits whilst retaining the building.

- d. *the repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period.*

The applicant advises that due to the 'physical constraints imposed by the form of the building' potential reuse 'is likely to be limited' and due to 'prevailing market conditions...no positive value can be generated in relation to reuse'. The Trust is concerned that this statement could well apply to any number of listed or historic buildings in Scotland which have fallen out of use. It fails to acknowledge the special interest of the building which the listing system exists to protect and the added value this can contribute to any redevelopment project.

The market and the economic context have changed considerably since 2004, when the building was last marketed, and there was interest in the building at that time. Therefore the Trust would suggest that a new marketing exercise should be carried out to demonstrate beyond reasonable doubt that there are no alternative restoring purchases for the building.

Alternatively the Trust would encourage the Council to work with a building preservation trust, or similar organisation, who may be able to unlock grant funding to help support a scheme to reuse the building.

The Trust would therefore suggest that this application fails to satisfy the SHEP criteria for demolition of a listed building, and must be **refused**.

City Square Proposals

The applicant proposes to redevelop the site if demolition is consented to create a city square. While the Trust has no objection to the principle of creating a public space should demolition be accepted, we believe that a thorough process must be conducted to find the best possible design solution to such an important site.

The Trust would also suggest that further analysis is needed of the buildings and uses surrounding the site. These buildings are currently viewed as part of the street scene but if this proposal goes forward they will be exposed prominently across a large public open space. Many of these existing buildings are unprepossessing in their



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facades and their scale, and the concern is that the space will be out of scale with the development surrounding it.

Quincy Market, Boston and Covent Garden in London are both referred to in the Design Statement as comparator spaces. Both feature covered markets in substantial buildings with public space provided in and around the buildings in the surrounding streets. This approach may be more sympathetic to the character of the urban grain and historic environment in Perth. Only a serious, and imaginative, marketing exercise will show whether this approach has any potential.

The Trust would suggest that if a public space is to replace a significant listed building, then the proposals must be of the highest quality. We feel that the current proposals do not match the aspirations of the Council. We would therefore recommend that Perth & Kinross Council hold a design competition for the site. The shortlisted designs should then be made available for public consultation and comment, promoting community involvement and ownership of the site.

A handwritten signature in black ink that reads "Gemma Wild". The signature is written in a cursive, slightly slanted style.

Gemma Wild
Technical Officer (Conservation and Design)

cc

Historic Scotland, AHSS, Perth Civic Trust

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