

**Delegated Report of Handling
Report by Chief Planning Officer**

Reference No	24/0749/LB
Application Type	Listed Building Consent
Proposal	Demolition of retained façade of former TA Building/ Drill Hall
Location	TA Centre, 76 High Street, Paisley
Ward	4 - Paisley Northwest
Community Council	Paisley West And Central Community Council
Applicant	JR Construction (Scotland Ltd)
Recommendation	Refuse
All plans, reports, documents and representations relating to this application can be viewed in full online at https://pl-bs.renfrewshire.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SLJI5HMWL4D00	

This report fulfils the requirements of regulation 16, Schedule 2, paragraphs 3(c) and 4 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013.

The report is presented to the Planning and Climate Change Policy Board in line with the Council's Scheme of Delegation as the application seeks listed building consent for the demolition of a listed building.

Proposal

This application seeks listed building consent for the demolition of the retained B listed façade of the TA Centre, 76 High Street, Paisley. The application states that the demolition- of the facade is urgently necessary in the interests of health and safety. A building warrant for demolition has also been submitted (24/1007/BW).

The TA Centre/former Drill Hall is a category B listed structure. It was designed by Thomas Graham Abercrombie and was constructed from around 1896 and formally opened in 1899. The building comprised of a symmetrical three storey section to the front elevation overlooking High Street to the south-east, with a large roofed drill hall to the rear. It remained in continuous occupation until 1996. In 2009 it was added to the Buildings at Risk Register.

A number of planning and listed building applications have been made to redevelop and/or partially demolish the building with a view to developing the site with the most recent following fire damage for partial demolition and erection of student accommodation with façade retention (20/0217/PP - 20/0218/LB). A building warrant (20/0730/EBC) for the demolition of the drill hall with façade retention was also approved in September 2020, with the demolition works for the drill hall completed and a façade retention scheme being put in place for the main masonry frontage, extending around the sides of the three storey section of the building.

Condition 2 of the listed building consent required that prior to the commencement of works to the retained façade, beyond those required as part of the emergency stabilisation works, a Conservation and Restoration Method Statement should be submitted for approval and should detail the schedule of works associated with the repair and restoration of the retained façade. These documents have not been submitted to the Council as Planning Authority.

The facade retention scheme is made up of scaffolding tubes and is linked to the masonry walling through the window and door openings. From a review of Google Earth images dated June 2024, the facade retention appears to be in accordance with approved building warrant drawings.

To date, much of the retention scheme has been removed over the majority of the building with only the bottom third or so remaining in place. As such, a temporary stop notice was issued on 14th October 2024, and thereafter a listed building enforcement notice and a stop notice were issued on 11th November 2024. The respective notices were issued in line with the terms of the Planning (Listed Building and Conservation Areas)(Scotland) Act 1997 and required the façade retention system to be reinstated. To date no further works have been undertaken to remove the remainder of the façade retention system however it should be noted that the façade retention system has not been reinstated.

Site Description

The TA Centre is located within Paisley Town Centre Conservation Area in an area of significant streetscape value. In addition to the high architectural historic merit of the building, it occupies an important and prominent position at the end of Paisley High Street. The building sits between the A-listed Coats Memorial Church and A-listed Paisley Museum which is currently being extended and refurbished.

Pre-Application Consultation with Officers

The Scottish Government strongly encourages constructive pre-application discussions between prospective applicants and the planning authority. Pre-application discussions seek to identify key planning considerations at an early stage and help inform what supporting information is required to support a subsequent application.

No pre-application discussions have taken place. Officers however did attend a site meeting with the applicant and their agents on 16th October 2024 following the removal of part of the façade retention system. The developers were advised of the need to reinstate the façade retention system and the need to obtain relevant consents should any other proposals be promoted.

Negotiated Improvements

No changes have been negotiated.

Site History

The planning history for the site is as follows; if no history is listed then planning has no record of previous applications for the site.

Application No: 20/0217/PP

Description: Erection of student accommodation, partial demolition of existing building with façade retention and associated external alterations, and erection of bin store.

Decision: Granted subject to conditions

Application No: 20/0218/LB

Description: Erection of student accommodation, partial demolition of existing building with façade retention and associated internal and external alterations (including retrospective emergency stabilisation works), and erection of bin store.

Decision: Granted subject to conditions.

Application No: 19/0809/NO

Description: Erection of student accommodation and associated uses, partial demolition of existing building with façade retention, and other associated works

Decision: Accepted;

Application No: 07/0131/PP

Description: Refurbishment & subdivision of main building to form 8 flats; refurbishment of chapel to form 1 house; demolition of rear buildings & erection of 17 new build flats & maisonettes with associated parking and landscaping

Decision: Granted subject to conditions

Application No: 07/0132/LB

Description: Refurbishment of main building & subdivision to form 8 flats; refurbishment of chapel to form 1 house; demolition of rear buildings & erection of 17 new build flats & maisonettes with associated parking and landscaping

Decision: Granted subject to conditions

Consultations

Historic Environment Scotland - Object. It has not been demonstrated that the demolition of this Category B-listed building meets any of the considerations set out in national policy.

Scottish Civic Trust - Object. The application requires genuine proof that the facade is too risky to retain. No reports in this regard have been provided.

Representations

The application has been publicised in line with the requirements of the relevant legislation.

15 representations objecting to the proposed development have been received including an objection from Paisley Central and West Community Council.

The issues raised can be summarised as follows:

1. Building located some distance from public domain and security should prevent danger to public.
2. Updated structural assessments required.
3. Unauthorised works being undertaken by applicants including removal of retention scheme and damage to building fabric.
4. Loss of culturally significant heritage.
5. Diminish protected streetscape.
6. Neglect of building.
7. Developers obtaining planning permission to add value to site and to make profit.
8. Contrary to NPPF4 and LDP policy.
9. Negative impact on conservation area.
10. Lack of justification within submission.

Policy Context

In making any determination under the Planning Acts, regard is to be had to the development plan unless material considerations indicate otherwise. In this instance the Development Plan consists of National Planning Framework 4 (NPF4) and the Renfrewshire Local Development Plan (2021) (LDP).

The following provisions of the Development Plan are considered relevant to the determination of this application:

National Planning Framework 4

Policy 7 - Historic assets and places

Full details relating to the policies of the NPF4 can be found [online](#).

Renfrewshire Local Development Plan
Policy ENV3 - Built and Cultural Heritage

Full details relating to the policies of the LDP can be found [online](#).

Other relevant policies and guidance

Renfrewshire New Development Supplementary Guidance 2022 - Delivering the Environment Strategy: Built Heritage.

Historic Environment Scotland's Historic Environment Policy for Scotland (HEPS) and associated "Managing Change in the Historic Environment" guidance note on Demolition of Listed Buildings.

Submitted Reports and Assessments

The following reports and assessments were submitted in support of the application:

Demolition Method Statement - Contains details of programme of works, site control, security and health and safety considerations.

Marketing Letter (Shepherd Chartered Surveyors) - Contains details of dates of property enquiries.

Site photographs - Photographs and drone images from around and above the façade.

In addition to the above, it should be noted that a **Structural Assessment Report** was commissioned by Renfrewshire Council and contains details on an assessment of the existing façade and its current condition, outlines structural calculations and dangerous building considerations.

Scottish Ministers Direction

In determining a planning application, the Council is required to provide details of any Direction made by Scottish Ministers under Regulation 30 (Directions requiring consultation), Regulation 31 (Directions requiring information), Regulation 32 (Directions restricting the grant of planning permission) and Regulation 33 (Directions requiring consideration of condition) of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, or under Regulation 50 (that development is EIA development) of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.

None.

Planning Assessment

The Town and Country Planning (Listed Buildings and Conservation Areas) (Scotland) 1997 Act states that in considering whether to grant listed building consent for any works, special regard must be had to the desirability of preserving the listed building or its setting, or any features of special architectural or historic merit.

The fourth National Planning Framework (NPF4) provides the long-term national spatial strategy for planning in Scotland. It sets out the Scottish Government's current view on delivering sustainable, liveable and productive places through the application of spatial principles. Policy 7 (Historic Assets and Places) states that demolition of listed buildings will not be supported unless it has been demonstrated that there are exceptional circumstances and that all reasonable efforts have been made to retain, reuse and/or adapt the listed building. Policy ENV 3 (Built and Cultural Heritage) of the Renfrewshire Local Development Plan is also applicable and presumes against the demolition of listed buildings unless fully justified.

Historic Environment Scotland's Historic Environment Policy for Scotland (HEPS) and associated "Managing Change in the Historic Environment" guidance note on demolitions also support these principles, with the latter document advising that demolition should only be approved as a last resort and typically at the end of a process which has considered and discounted all other feasible options.

To assess whether the proposed demolition is justified in terms of the above, Historic Environment Scotland's "Managing Change in the Historic Environment" guidance note on Demolition of Listed Buildings outlines four tests under which demolition may be established as acceptable. These four tests are also reflected in Policy 7 of NPF4 and the Renfrewshire New Development Supplementary Guidance highlighted above. In this regard, demolition may only be considered acceptable if it is demonstrated that the proposal accords with one of the following:

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

Proposals typically only require to satisfy one of the four tests, although Historic Environment Scotland guidance outlines that exceptions to this may apply. The four tests are considered in order, as follows:

- a) The building is not of special interest

The TA Centre/former Drill Hall is a category B listed structure. It was designed by Thomas Graham Abercrombie and was constructed from around 1896 and formally opened in 1899. The building comprised of a symmetrical three storey section to the front elevation overlooking High Street to the south-east, with a large roofed drill hall to the rear. Historic Environment Scotland advise that the building is generally considered to rank among Thomas Abercrombie's best buildings and has a considerable streetscape presence and along with its neighbours, Coats Memorial Church and Paisley Museum, forms a strong group of monumental public buildings at the end of Paisley High Street,

The facade retention scheme retains considerable architectural value, both as an example of Abercrombie's work and for its relationship with Coats Memorial Church and Paisley Museum. Historic Environment Scotland also advise that the interest of the building has been reduced by the loss of the drill hall and interior of the front building, however, much of the building's interest derives from its external appearance, contribution to the townscape and historic associations, which survive. It is therefore considered that the building remains of special interest.

In view of the above, demolition of the building would not pass the first of the four tests.

- b) The building is incapable of repair

The applicant has not provided documentation/reports with this regard. Notwithstanding this, the Structural Assessment commissioned by the Council is considered to be of significance. This report finds no evidence to demonstrate that either the building or the façade retention system were unstable at the time the dismantling work started. The report highlights that that retained façade appears to be in generally reasonable condition. The report concludes that the building is now in a dangerous condition because the upper storeys are unrestrained as a

direct result of the partial removal of the façade retention system and recommends that the retention system should be reinstated to remove the danger.

In 2020 consent was granted to incorporate the façade into a student housing development. The consented development demonstrated that the special interest of the facade could be retained within a new development. Incorporation of retained facades into new development is relatively common and the supporting information does not demonstrate that this would no longer be possible. Historic Environment Scotland advise that whilst the facade being incorporated into a new development would be welcomed as soon as possible, it should also be possible for a facade retention system to safely keep the structure in reasonable condition for an extended period of time.

In summary, the report considered that the building could be capable of repair and the proposed demolition therefore does not pass the second test.

- (c) The repair of the building is not economically viable, having been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period.

A letter from Shepherd Chartered Surveyors has been submitted in support of the application. The letter states that the subjects were listed on the open market on 10 September 2021 on Shepherd's website and via recognised real estate search engines including social media platforms. A press release was also issued. The letter contains details of 6 enquiries from September 2021 to May 2022 and that no significant interest has been generated.

Whilst it is noted that the marketing of the building has resulted in minimal interest there has been no demonstration that the building has been marketed at a price reflecting its location and condition to potential restoring purchasers. Historic Environment Scotland also advise that the supporting information demonstrates that the building has been and continues to be marketed and that no offers have been made. In addition to the supporting information, it is noted that at least one sale advertisement dates back to 2021, while another dates to this month. The particulars are not clear in terms of asking price and if sales particulars included the consented scheme for developing the site.

In summary, although it is evident that marketing has been carried out, HES Managing Change in the Historic Environment - Demolition of Listed Buildings, makes clear that a financial assessment should also be submitted to demonstrate that alternatives to demolition are not economically viable, including a detailed assessment of costs and the likely value of the completed project. No such financial assessment has been submitted and so it has not been demonstrated that this consideration is applicable. As such, the proposal would not meet this test.

- (d) The demolition of the building is essential to delivering significant benefits to economic growth or the wider community

As discussed above, planning and listed building consent was approved in 2020 where the retained façade would be incorporated into the development of the site. The applicant, within the submission for listed building consent, has not demonstrated that the retention of the structure would hinder any viable alternative proposals relevant to delivering economic growth or wider community benefit in the area. Historic Environment Scotland also advise that this consideration is not addressed in the supporting information and that HES is not aware of any reason why it would be applicable here. The proposal would therefore not meet this test.

Summary

In view of the foregoing, there is no clear justification to support the demolition of the listed building. The building is of special architectural and historic interest and appears to be capable of repair. There are also no economic reasons sufficient to warrant approval to demolish the listed building. It has not been demonstrated that demolition is necessary as a last resort or that there are alternative pertinent grounds for allowing demolition. The proposal is therefore contrary to Policy 7 of NPF4, Policy ENV3 of the Adopted Local Development Plan and the New Development Supplementary Guidance on listed buildings and the relevant policies and guidance of Historic Environment Scotland.

Representations

With regards to the concerns raised within the representations: -

1. Building located some distance from public domain and security should prevent danger to public.

This would be a matter to be considered within the Building Warrant submission.

2. Updated structural assessments required.

The applicant has not provided documentation/reports in this regard.

3. Unauthorised works being undertaken by applicants including removal of retention scheme and damage to building fabric.

Due to the unauthorised works that have taken place, a temporary stop notice was issued on 14th October 2024, and thereafter a listed building enforcement notice and a stop notice were issued on 11th November 2024. The respective notices were issued in line with the terms of the Planning (Listed Building and Conservation Areas) (Scotland) Act 1997 and require the façade retention system to be reinstated.

4. Loss of culturally significant heritage.
5. Diminish protected streetscape.

The retained façade is of considerable architectural value, as an example of Abercrombie's work. Historic Environment Scotland advise that although the interest of the building has been reduced by the loss of the drill hall and interior of the front building, much of the building's interest derives from its external appearance, contribution to the townscape and historic associations, which survive. It is therefore considered that the building remains of special interest and that its demolition would result in a loss of cultural heritage to the detriment of the character and appearance of the conservation area.

6. Neglect of building.

As discussed above, the Structural Report commissioned by the Council in October 2024 concludes that as a result of the façade removal to date, the building is now in a dangerous condition because the upper storeys are unrestrained as a direct result of the partial removal of the façade retention system and recommends that the retention system should be reinstated to remove the danger. It is considered that the removal of the façade retention scheme has had a detrimental impact on the condition of the remaining structure.

7. Developers obtaining planning permission to add value to site and to make profit.

This matter is not a material consideration.

8. Contrary to NPF4 and LDP policy.

Agreed. It is considered that for the reasons discussed above, there is no clear justification to support the demolition of the listed building and the proposal is considered to be contrary to NPF4, the adopted Local Development Plan and the New Development Supplementary Guidance on listed buildings and the relevant policies and guidance of Historic Environment Scotland.

9. Negative impact on conservation area.

As discussed above, it is considered that the retained façade of the TA Centre occupies a visually prominent location within Paisley Town Centre Conservation Area and retains considerable architectural value as an example of Abercrombie's work. For these reasons, it is considered that its demolition would have a detrimental impact on the character and appearance of the conservation area.

10. Lack of justification within submission.

Agreed. It is considered that there is no clear justification to support the demolition of the listed building.

Planning Obligations

The Council is required to provide a summary of the terms of any planning obligation which is required to be entered into under Section 75 of the Town and Country Planning (Scotland) Act in relation to the grant of permission for the proposed development:

None

Conclusion

In view of the above, it is considered that the proposal would not accord with the relevant provisions of the Development Plan and there are no other material considerations that would outweigh the provisions of the development plan. In this regard Listed Building Consent should therefore be refused.

Recommendation

Refuse

Reason(s) for Recommendation

1. That the proposal is contrary to Policy 7 of NPF4, Policy ENV3 of the Adopted Local Development Plan and the New Development Supplementary Guidance on listed buildings and the relevant policies and guidance of Historic Environment Scotland as there is no clear justification to support the demolition of the listed building. The building is of special architectural and historic interest and appears to be capable of repair. There are also no economic reasons sufficient to warrant approval to demolish the listed building and it has not been demonstrated that demolition is necessary as a last resort or that there are alternative pertinent grounds for allowing demolition.

Condition(s)

1. None required.

Advisory Note(s)

1. None required.

Schedule of Plans Determined

Drawing Number	Revision	Drawing/Document Title	Stamped Drawing
AL(00)001		Location Plan	
AL(20)001		Context Plan as Existing	
Supporting Documents			
		Cover letter - iceni – 17 October 2024	
		Shepherd Chartered Surveyors – The TA Building, 76 High Street, Paisley, Renfrewshire, PA1 2BA – 17 September 2024	
		Strathclyde Demolition - Method Statement Demolition of TA Building Sandstone Wall	
		Photographs/Drone footage	

For further information please contact Fiona Knighton, Development Standards Team, Email: fiona.knighton@renfrewshire.gov.uk.