

**PLA/21/162- Draft Guide to Planning Consents for the Aberdeen Multis Public Consultation Response**

**TABLE 1: Summary of responses and issues arising from public consultation held from 3 May 2021 to 14 June 2021**

**Question 1: Do you have any comments on 'the Draft Guidance to Planning Consents for the Aberdeen Multis'?**

<i>Key issue</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
<b>1. Historic Environment Scotland (HES)</b>		
<p><b>1.1.</b> HES has suggested the change of the title of the document from 'A Guide to Planning Consents for the Aberdeen Multis' to 'A Guide to Planning Consents for the Aberdeen Inner-City Multis'.</p> <p><b>1.2.</b> HES has made a number of suggestions in the main body of the guidance document:</p> <ul style="list-style-type: none"> <li>- It is suggested that 'HES' is removed in section 1.1</li> <li>- It is suggested that the below sentence is removed from section 1.3:  <i>"There is currently no specific national guidance on the management of change to post war buildings, however if any such guidance is prepared by Historic Environment Scotland then this guidance will be reviewed and updated if required."</i></li> </ul>	<p>Comments noted and accepted. At present the guidance implies all multis in Aberdeen and it is considered that the change in the title will provide further clarity.</p> <p>This section is an introduction to the listing of these multis which makes reference to their designation as Category A-listed buildings by HES.</p> <p>Officers feel this section should be left unaltered as it provides additional information on a) the reasoning for preparation of this guide and b) any future reviews that might be necessary. This review could be either after introduction of national guidance on management of change to post war/modern buildings or in the case of introduction of updated guidance on Listed Building Consent by HES.</p>	<p>Amend the title to reflect this.</p> <p>No action required.</p> <p>No action required.</p>

<ul style="list-style-type: none"> <li>- Suggestions have been received to remove some of the explanations of 'What is a Listed Building?' In Section 2.1.</li>   <li>- It is suggested that the below sentence is removed from section 2.2:   <i>"The buildings were listed due to Historic Environment Scotland considering them to be of significant architectural interest and outstanding examples in Scotland of the modernist New Brutalism style in multi-storey housing. A 'Report of Handling', which informed the decision to list, is published on the Historic Environment Scotland Portal."</i></li>   <li>- Comments received suggesting moving installation of individual satellite dishes to Amber.</li> </ul>	<p>Officers feel this section should be left unaltered. The intention of this document is to provide clear guidance on the requirement for Listed Building and Planning Consents for residents and home owners in plain English and it is necessary to have a clear definition of Listed Building Consent for those who might not be familiar with different Planning Consents.</p> <p>This section refers to the designation of these buildings and the report of Handling by HES. Officers consider it necessary to provide a clear distinction between different roles of HES (designation) and the Local Authority (determination of planning consents).</p> <p>Officers feel the installation of individual satellite dishes should be kept in Red Category of works as their cumulative visual impact could have a detrimental impact on the special character of these buildings.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
<b>2. SSE</b>		
<b>2.1.</b> No comments	None	No action required.
<b>3. Scottish Water</b>		
<b>3.1</b> No specific comments on the document, however recommend Aberdeen City Council or Developers to contact Scottish Water at their earliest convenience should water or	Comments noted.	Passed onto the Aberdeen City Council Principal Architect.

<p>drainage work be carried out servicing any of the eight buildings, i.e. the pipework on the road/footpath out-with the Multis and the red, amber and green criteria.</p>		
<p><b>4. George Street Community Council</b></p>		
<p><b>4.1.</b> George Street Community Council is disappointed with the details of the public consultation that took place prior to the listing of these multis and their designation as category 'A' listing.</p> <p><b>4.2.</b> Two of the listed multis lie in a post code of the poorest people in Scotland. George Street Community Council has concerns about fuel poverty/ existing poor thermal insulation and ventilation in these buildings. The Community Council believes that this listing and Grenfell Disaster will lead to greater expense to the residents or owners of these flats. The Community Council has concerns that works in in the green section of the guidance will not meet the current Building Standards for taller buildings.</p> <p><b>4.3.</b> The Community Council asks for the consultation to be halted until Covid-19 restrictions allow for a full public consultation on HES decision to list these buildings.</p>	<p>The public consultation that took place before listing of these buildings was organised solely by HES and was outwith ACC's control. The consultation on the guidance documents is not on the principle of whether these buildings should be listed buildings, as this is a decision that has already been made by Historic Environment Scotland earlier this year.</p> <p>The guidance document makes it clear that the Planning Authority aims towards a light-touch approach for managing change within these listed buildings due to their individual circumstances. The listing would not limit the ability of individual property owners to meet fire regulations requirements or improve thermal efficiency of the properties (e.g. fire-resistant doors, thermally efficient windows and fire detection systems etc.). It is highly unlikely that listed building consent or planning permission would be required for fire safety or thermal efficiency upgrades (e.g. new doors, windows or smoke alarms etc).</p> <p>Aberdeen City Council was unable to halt the consultation to discuss the principle of listing in a public meeting. This consultation was not on the principle of whether these buildings should be listed,</p>	<p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p> <p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p> <p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p>

	as this is a decision that has already been made by HES.	
<b>5. Public Responses</b>		
<b>5.1 [ANON-TYWD-9GT6-J]</b> No comments	None	No action required.
<b>5.2 [ ANON-TYWD-9GTF-2]</b> The respondent has concerns on the appeal submitted by Aberdeen City Council which fails to understand the significance of Aberdeen Multis.  The respondent notes that ACC guidance document is supported by HES and that the listing will not be a barrier in making these flats fit for purpose.	This public consultation is on the proposed guidance document and is separate from the appeal being made by the Corporate Landlord on the listing of these buildings.  Comment noted.	No amendment to the document required. Comments passed to the Corporate Landlord for information.  No action required.
<b>5.3 [ANON-TYWD-9GTW-K]</b> The respondent has concerns on the visual appearance of these buildings and disagrees with their listing.  The respondent has concerns on maintenance costs and believes these multis should be replaced with modern buildings.	This public consultation is not on the principle of whether these buildings should be listed buildings, as this is a decision that has already been made by Historic Environment Scotland.  It is highly unlikely that listed building consent or planning permission would be required for routine maintenance works. This consultation is on the guidance documents that provides advice on planning consents for these buildings and does not discuss potential alternative futures for these buildings.	No amendment to the document required. Comments passed to the Corporate Landlord for information.  No amendment to the document required. Comments passed to the Corporate Landlord for information.
<b>5.4 [ANON-TYWD-9GT2-E]</b> The respondent has concerns on the visual appearance of these buildings and believes their listing is unreasonable.	This public consultation is not on the principle of whether these buildings should be listed buildings, as this is a decision that has already been made by Historic Environment Scotland.	No amendment to the document required. Comments passed to the Corporate Landlord for information.

<p><b>5.5 [ANON-TYWD-9GT1-D]</b> The respondent believes the idea to list these buildings came from someone in Edinburgh.</p>	<p>This public consultation is not on the principle of whether these buildings should be listed buildings, as this is a decision that has already been made by Historic Environment Scotland.</p>	<p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p>
<p><b>5.6 [ANON-TYWD-9GTY-N]</b> The respondent has concerns on overdue refurbishment works particularly for Hutcheon Court. The lifts and the main foyer are run down.</p>	<p>It is highly unlikely that listed building consent or planning permission would be required for routine maintenance works.</p>	<p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p>
<p><b>5.7 [ANON-TYWD-9GTP-C]</b> The respondent believes these buildings are neglected and that if Aberdeen City Council was not so busy with its 'A' listed Headquarter, they might have some resources for these buildings where real people live.</p>	<p>These buildings have been listed by Historic Environment Scotland. This guidance document has been prepared by Aberdeen City Council Planning Service to provide advice on the requirement for Listed Building Consent and Planning Permission. Aberdeen City Council- Corporate Landlord is responsible for carrying out an ongoing schedule of repairs across these buildings.</p>	<p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p>
<p><b>5.8 [ANON-TYWD-9G5C-Z]</b> The respondent believes the guidance document is clear and informative.</p>	<p>Comments noted.</p>	<p>No action required.</p>
<p><b>5.9 [ANON-TYWD-9G5D-1]</b> The respondent has concerns about the condition of the building and heating costs.</p>	<p>It is highly unlikely that listed building consent or planning permission would be required for routine maintenance works.</p>	<p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p>
<p><b>5.10 [ANON-TYWD-9G53-G]</b> The respondent has concerns on the implications of listing on maintenance cost and their frequency.</p>	<p>It is highly unlikely that listed building consent or planning permission would be required for routine maintenance works.</p>	<p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p>

<p><b>5.11 [ANON-TYWD-9G5F-3]</b> The respondent asks whether the security systems are going to be replaced?</p> <p>The respondent has concerns on the implications of listing on overdue maintenance works by ACC.</p> <p>The respondent asks questions on the current condition of the buildings despite the monthly fee paid by households and asks for this fee to be reduced in line with the lack of maintenance due to new planning consents?</p>	<p>This guidance document aims to answer common questions on Listed Building Consent and Planning Permission and does not prioritise maintenance works. It is highly unlikely Listed Building Consent or Planning Permission would be required for the upgrade of security systems.</p> <p>It is highly unlikely that listed building consent or planning permission would be required for routine maintenance works.</p> <p>Aberdeen City Council- Corporate Landlord is responsible for carrying out an ongoing schedule of repairs across these buildings.</p>	<p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p> <p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p> <p>No amendment to the document required. Comments passed to the Corporate Landlord for information.</p>
<p><b>5.12 [ANON-TYWD-9G5R-F]</b> The respondent supports the guidance but suggests that the effectiveness of the document will be proven in time.</p> <p>The respondent believes satellite dishes should be banned completely.</p>	<p>Comments noted.</p> <p>Proposals for satellite dishes are currently classified in Red category of works- alterations that would affect the special architectural or historic interest of the building and they will be fully assessed in line with relevant policy and guidance.</p>	<p>No action required.</p> <p>No action required.</p>
<p><b>5.13 [ANON-TYWD-9G55-J]</b> The respondent did not manage to find the information on the Traffic Lights.</p>	<p>The term 'Traffic Light' was used in the guidance document to classify the proposed works into three categories of Green, Amber and red.</p>	<p>No action required.</p>

<p>The respondent has concerns on the digital format of the consultation for mature non-computer users.</p>	<p>Apart from the online consultation through 'Consultation Hub', two other meetings took place with City Centre Multi Storeys Group on two occasions on 31 March and 26 May 2021 with presentations given by ACC Senior Conservation Officer over Microsoft Teams to address the gap left by lack of face to face engagement. Given the public health restrictions due to COVID-19, it was not possible to have a public meeting to ensure the safety of both attendees and staff.</p>	<p>No action required.</p>
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