

# Appendix 3: Full Un-summarised Copies of Representations

## Sepideh Hajisoltani

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**From:** Hart, Tommy <Tommy.Hart@sse.com>  
**Sent:** 03 May 2021 10:04  
**To:** Sepideh Hajisoltani  
**Subject:** RE: Public Consultation - Draft Guidance to Planning Consents for the Aberdeen Multis

Sepi

Thanks for the consultation. We shall not be offering comments on this.

Regards

Tommy

**Tommy Hart BLE (Hons) MRTPI** | Town Planning Specialist

**M:** 07778 375400

**sse-transmission.co.uk**



**Please note I am now working from home for the foreseeable future. My hours will be flexible to work around childcare, but I remain available on mobile or email.**

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**From:** Sepideh Hajisoltani <SHajisoltani@aberdeencity.gov.uk>  
**Sent:** 03 May 2021 09:06  
**Subject:** [EXTERNAL] Public Consultation - Draft Guidance to Planning Consents for the Aberdeen Multis

WARNING: this email has originated from outside of the SSE Group. Please treat any links or attachments with caution.

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Dear All,

Please see [\[Link\]](#) to the Draft Guidance to Planning Consents for the Aberdeen Multis Public Consultation.

The Draft Guidance to Planning Consents for the Aberdeen Multis was approved for public consultation at the Planning Development Management Committee on 18 March 2021. This guidance document has been prepared in response to the designation of eight multi-storey blocks of flats in Aberdeen as Category A listed buildings by Historic Environment Scotland (HES) earlier this year.

Full details can be found on the consultation hub at the above link. [The closing date for the consultation is 14 June 2021.](#)

All comments welcome and feel free to share the link to any other interested parties.

Kind Regards  
Sepi

## Sepideh Hajisoltani

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**From:** George Street Community Council <georgestreetcc@gmail.com>  
**Sent:** 03 May 2021 12:11  
**To:** Sepideh Hajisoltani; Sandra Macdonald; Michael Hutchison; Dell Henrickson; Ryan Houghton; PI; Karen Finch  
**Subject:** Public Consultation - Draft Guidance to Planning Consents for the Aberdeen Multis

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sepideh Hajisoltani

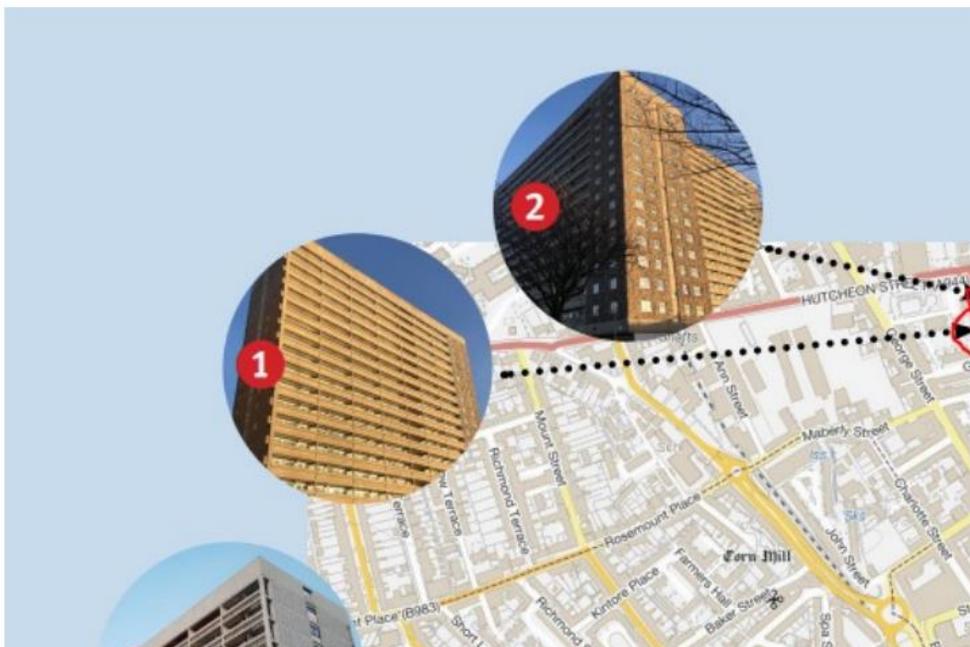
Thank you for your email of today Monday the 3rd of may 2021

I have just viewed the guidance notes on planning application for the multis that I see is category A George street as can be seen from the map below is home to half of he multis included in the listing.

Firstly am very disappointed that Historic Scotland did not see fit to contact us George Street Community Council or that no Aberdeen City Planning officer felt the need to tell us that the intension was to give these flats category A listing, All through this process we were told that it would be a minor listing that would not affect the residents unduly. Category A can not be called minor.

As an organization that is very concerned with stopping discrimination in all its forms I bring your attention to the map extract from the Scottish Index of Multiple Deprivation 2020 below. Two of these blocks lie in a postcode of the poorest people in Scotland and all are well below the mean, this brings my concern of fuel poverty to the front and the existing poor thermal insulation and ventilation in these homes. This listing & the fall out from the Grenfell disaster will lead to greater expense to the residents or owners of the flats and many of the conditions of the green guidance to not be possible as they would not meet current building standards for taller buildings.

I ask that this guidance be halted until Covid19 restrictions allow for a full public meeting be held to discuss this with time to respond.





Regards  
Andy MacLeod  
Chair George Street Community Council



## Sepideh Hajisoltani

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**From:** Michael Scott (Heritage) <michael.scott@hes.scot>  
**Sent:** 14 May 2021 14:20  
**To:** Sepideh Hajisoltani  
**Cc:** Ross Wilson; Dawn McDowell; Steven Robb  
**Subject:** RE: Public Consultation - Draft Guidance to Planning Consents for the Aberdeen Multis  
**Attachments:** A Guide to Planning Consents for the Aberdeen Multis (HES comments).pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Sepi

Thanks for including us in your consultation. We much appreciate your Council's production of the guidance.

I attach an 'edited' version with our comments and suggestions added. I hope this is legible.

Happy to clarify and discuss further if that would be helpful.

Kind regards

Mike

**Michael Scott | Senior Historic Buildings Adviser | Heritage Directorate**

Historic Environment Scotland | Àrainneachd Eachdraidheil Alba

m | 07768 498519

e | [michael.scott@hes.scot](mailto:michael.scott@hes.scot)

**Heritage Management Policy and Guidance online at:**

[www.historicenvironment.scot/heps](http://www.historicenvironment.scot/heps) + [www.historicenvironment.scot/advice-and-support](http://www.historicenvironment.scot/advice-and-support)



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**From:** Sepideh Hajisoltani <SHajisoltani@aberdeencity.gov.uk>

**Sent:** 03 May 2021 09:06

**Subject:** Public Consultation - Draft Guidance to Planning Consents for the Aberdeen Multis

Dear All,

Please see [\[Link\]](#) to the Draft Guidance to Planning Consents for the Aberdeen Multis Public Consultation.

The Draft Guidance to Planning Consents for the Aberdeen Multis was approved for public consultation at the Planning Development Management Committee on 18 March 2021. This guidance document has been prepared in response to the designation of eight multi-storey blocks of flats in Aberdeen as Category A listed buildings by Historic Environment Scotland (HES) earlier this year.

We suggest the title be 'Aberdeen Inner-city Multis'. At present the guidance implies all multis in Aberdeen.

# A Guide to Obtaining Consents for the Aberdeen Multis



March 2021

March 2021

## Contents

	Page
1. Introduction	3
2. Listing	5
3. What Listing Means	5
4. When is Consent Required?	5
5. Further Information	7

## 1. Introduction

**1.1.** Eight multi-storey blocks of flats in Aberdeen have been designated as Category A-listed buildings by Historic Environment Scotland (HES). These concrete buildings were constructed as part of the city's post-Second World War housing programme, and are considered by HES to be outstanding examples of Brutalist architectural style. The buildings were found to meet the criteria for listing and were designated by HES on 18 January 2021.

### 1.2. Who is this guide for?

This guide provides clarification on what Category A designation means for these buildings, their owners and the people who live in them. Listing will usually only affect you if you want to make changes to a listed building. Depending on the works you plan to carry out, you may need Listed Building Consent or Planning Permission from Aberdeen City Council as the Planning Authority before starting work. This guide provides more information on what may or may not require consent.

### 1.3. Why has a guide been produced?

We have put together this guide to answer some anticipated questions from those who live in, or care for, these listed buildings.

Most people associate listing with more historic buildings, Victorian or earlier examples, constructed from traditional materials. There are however many examples of Modern and Post-Modern buildings that have been selected for listing across Scotland. The lists of buildings of special architectural or historic interest are continually being refreshed and new proposals for the post-war period are increasingly being suggested to HES.

Several post-war tower blocks across Scotland have been previously listed to recognise their particular importance. Listing designations have implications on the requirement for Listed Building Consent and may raise various questions in terms of maintenance and alterations.

This guidance has been prepared to provide clarification on managing change sensitively to meet the needs of these particular listed multi-storey buildings.

~~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.~~

### 1.4. What status does this guide have?

This is a Non-Statutory Planning Guidance document which means it has been prepared to provide detail on an emerging topic and can be updated as required. This guidance supports Aberdeen Local Development Plan Policy D4 (Historic Environment) and, once adopted, will be a material consideration in decision making.

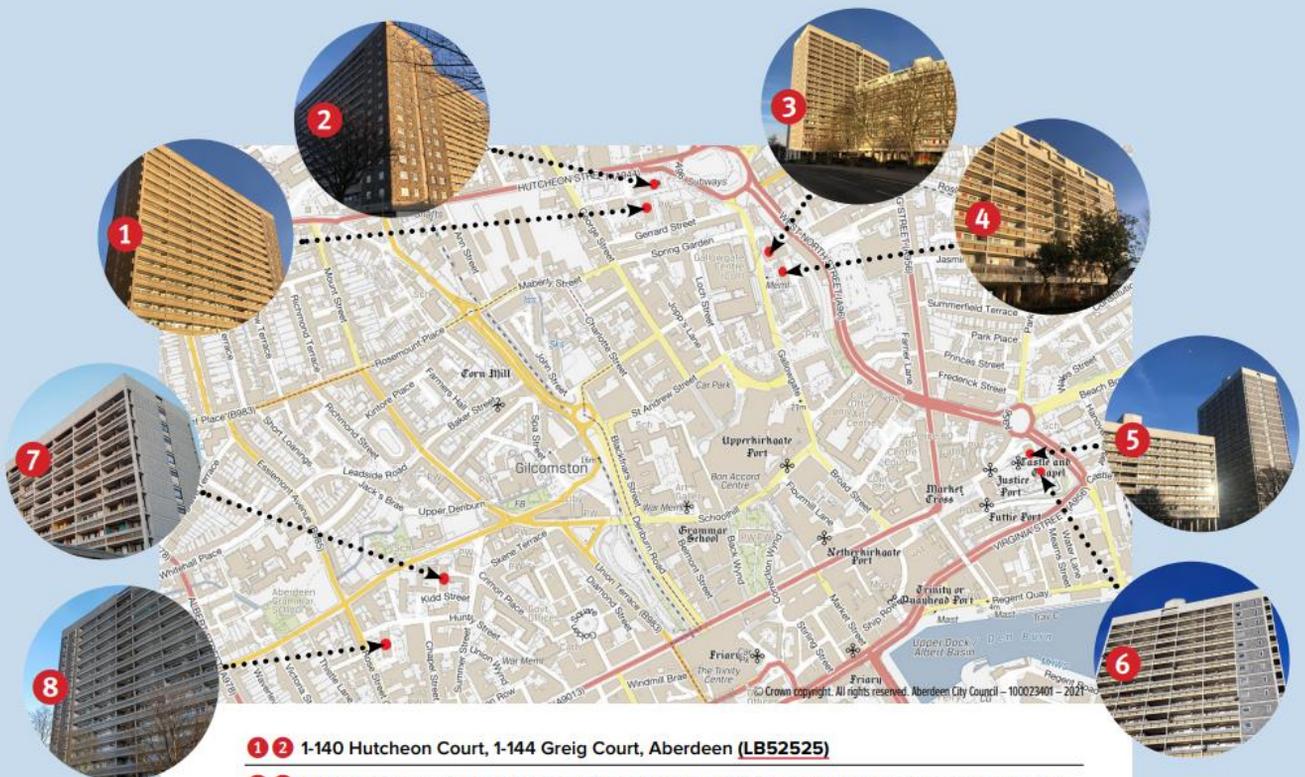
### 1.5. Who do I contact with any questions?

If you have any questions, please contact Aberdeen City Council Strategic Place Planning:

Email: [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)

Tel: 01224 523470

[www.aberdeencity.gov.uk/services/planning-and-building](http://www.aberdeencity.gov.uk/services/planning-and-building)



**1 2** 1-140 Hutcheon Court, 1-144 Greig Court, Aberdeen (**LB52525**)

**3 4** 1-72 Porthill Court, 1-126 Seamount Court, shop units at 152-158 (even numbers) Gallowgate, including multi-storey car park to West North Street, Gallowgate, Aberdeen (**LB52524**)

**5 6** 1-48 Virginia Court, 1-108 Marischal Court, Aberdeen (**LB52523**)

**7 8** 1-75 Gilcomstoun Land, Aberdeen (**LB52522**) **8** 1-126 Thistle Court, Aberdeen (**LB52531**)

## 2. Listing

### 2.1 What is a Listed Building?

Historic Environment Scotland lists buildings of special architectural or historic interest. Listing is carried out under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. To merit listing, the structure must meet the listing criteria. Once listed they are included on a list of buildings of special architectural or historic interest compiled by HES on behalf of Scottish Ministers. The policy which explains the selection criteria for listing can be found in Annex 4 of the HES [Designations Policy and Selection Guidance](#).

### 2.2 Which Multis Blocks have been Listed?

Eight inner-city multi-storey blocks of flats have been designated by Historic Environment Scotland at five separate sites. One of the listings at Gallowgate (Porthill Court and Seamount Court) also includes an associated parade of shops and a multi-storey car park. The listings are all Category A. This is the highest category of listing in Scotland for buildings of special architectural or historical interest and includes outstanding examples of a particular period, style or building type.

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](#). The Listed Building Records explain why the buildings have been listed.

### 3. What Listing Means

Listing will usually only affect you if you want to make changes to a listed building. Depending on the works you plan to carry out, you may need Listed Building Consent or Planning Permission from the Planning Authority before starting work. The Planning Authority in Aberdeen is part of Aberdeen City Council. There is currently no charge to apply for Listed Building Consent, and you apply in much the same way as for Planning Permission, i.e. submitting an application form and plans of the proposed work. You can submit your application online using the Scottish Government's ePlanning website. Historic

Environment Scotland advise on Listed Building Consent applications when asked to do so by the Planning Authority.

Importantly, it is a criminal offence to demolish or extend a listed building without Listed Building Consent. It is also a criminal offence to alter a listed building in any way which would affect its character as a building of special architectural or historic interest unless you have Listed Building Consent. This can all include objects or structures fixed to the listed building.

### 3.1 Role of Aberdeen City Council's Corporate Landlord

Listing a building does not affect routine repairs and maintenance and does not add an additional requirement on owners to maintain their buildings. As before, the Housing Team at Aberdeen City Council are responsible for managing the programme of repair and maintenance of the Multis. To request a repair contact:

**Aberdeen City Council, Housing**

**Tel 03000 200 292**

**[www.aberdeencity.gov.uk](http://www.aberdeencity.gov.uk)**

## 4. When is Consent Required?

In this guide we have used a traffic light system to show how works to the Aberdeen Multis will be categorised.

**GREEN** – examples of works where Listed Building Consent / Planning Permission will not be required and do not need discussion with the Planning Authority.

**AMBER** – examples of works which need an initial discussion with the Planning Authority to see if Listed Building Consent / Planning Permission is required.

**RED** – examples of works which will need Listed Building Consent and/or Planning Permission application(s).

Please note that these categories are applicable to the Aberdeen Multi-storey Buildings only and have been prepared with due recognition of their particular special architectural and historic interest. This guide is not applicable to other listed buildings across the city, proposals for which will be considered on their own individual merits.

### GREEN

Green works are works to the Multis which the Planning Authority would consider are always acceptable and would not affect the character of the building or its special architectural or historic interest. These could be works to communal areas or communal property led/carried out by Aberdeen City Council as majority building owner or works carried out by individual flat owners / tenants (depending on the tenancy agreement). For example:

#### Green works by individual flat owners / tenants:

- Internal redecoration and modernisation of individual flats – for example new front or interior doors, wallpaper, painting, flooring, bathrooms, kitchens and new lighting and cabling.
- replacement windows / external (outside) doors where these use the same materials, have the same method of opening, and have the same proportions as the existing windows or external doors.
- the removal or alteration of non-structural internal walls within a flat.
- like-for-like works replacing elements of shopfronts (applicable to the Gallowgate blocks).

#### Green works by owners (normally led or carried out by Aberdeen City Council) to communal areas or communal property:

- Routine maintenance and repairs to the outside of the buildings where these use the same materials and details as currently exist, and where the work carried out matches exactly what was there previously.
- replacement windows / external (outside) doors where these use the same materials, have the same method of opening, and have the same proportions as the existing windows or external doors.
- non-invasive cleaning and repainting of the exterior (outside) if there is no obvious change in colour.
- interior repair / upgrade / modernisation / redecoration to communal areas (including entrance areas, stairs, lifts, and undercroft facilities, such as laundry and storage buildings).
- the removal or alteration of non-structural internal walls.
- repair and replacement of existing utilities.

### AMBER

Amber works are where advice should be taken from the Planning Authority to find out if an application for Listed Building Consent and/or Planning Permission is needed. For example:

#### Amber works by individual flat owners / tenants:

- individual flat window / external (outside) door replacement where these will not use the same materials as the existing ones, or do not have the same method of opening or the same proportions.
- structural alterations to interior layout of flats and maisonettes (such as taking down a load bearing wall).

#### Amber works by owners (normally led or carried out by Aberdeen City Council) to communal areas or communal property:

- localised repair / replacement of concrete frame / panels, granite aggregate, and balcony parts which do not match exactly what was used previously.
- Localised repair/replacement of existing roof installations which do not match exactly what was used previously.
- individual flat window / external (outside) door replacement where these will not use similar materials, have the same method of opening, or have the same proportions as the existing.
- thermal upgrade programmes.
- minor adaptation (introduction of ramps or handrails) to exterior or interior communal areas to improve accessibility / meet Equality Act 2010 standards.
- comprehensive new utilities scheme affecting more than one flat – for example heating, plumbing, electrical systems etc.
- undercroft works such as resurfacing, repaving, minor new facilities (stores, bike-sheds).
- replacement or new lighting, cabling, CCTV cameras, replacement or new signage (all exterior only).
- structural alteration to interior layout of flats and maisonettes (such as taking down a load bearing wall).
- installation of exterior telecommunication equipment.
- installation of communal/shared satellite dishes.

## RED

Red works will require Listed Building Consent and Planning Permission and include alterations or demolition works that would affect the special architectural or historic interest of the buildings. Most of these examples would be led or carried out by Aberdeen City Council as majority building owner. The requirement for consent does not mean that the works will not be able to proceed but full assessment in line with relevant policy and guidance will be required first.

### Red works by individual flat owners:

- balcony alterations.
- the installation of individual satellite dishes

### Red works by owners (normally led or carried out by Aberdeen City Council) to communal areas or communal parts of buildings:

- comprehensive exterior refurbishment and replacement where these will not use the method of opening, or have the same profile
- extensive non "like-for-like" repair and/or replacement of panels, granite aggregate.
- introduction of new external cladding.
- balcony alterations, including infill screens
- new roof additions,
- alterations/extensions to undercroft areas and enclosure of open space and enclosure of concrete
- comprehensive fire safety upgrades, including fire tower additions.
- major thermal upgrade schemes which impact on external appearance.
- major interior alterations, such as reconfiguration of original crossover plan for maisonettes.
- wholesale demolition or substantial demolition of building.

900444  
Suggest satellite dishes be moved to Amber

The above lists are presented as guidance and are not exhaustive. If you have any doubt regarding the need for consent then the Planning Authority should be consulted in the first instance. Works to communal areas will still require a "scheme decision" by the owners in line with the Tenements (Scotland) Act 2004.

### 4.1. Building Standards

Some works listed above may also require a Building Warrant. This should be clarified with Building Standards through the Application Support Team.

Aberdeen City Council, Strategic Place Planning

Tel 01224 523470

Email [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)

[www.aberdeencity.gov.uk/services/planning-and-building](http://www.aberdeencity.gov.uk/services/planning-and-building)

### Further information

You can find further details on policy and guidance in the following links:

[Historic Environment Scotland Designation Policy and Selection Guidance](#)

[Aberdeen City Council's Listed Buildings](#)

[Historic Environment Policy for Scotland \(HEPS\)](#)

[Planning Change in the Historic Environment](#)

[Aberdeen Local Development plan](#)

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Ma tha thu ag iarraidh eadar-theangachadh den sgrìobhainn seo ann an cànan neo cruth eile (clò mòr neo clàr claidinneach) feuch an cuir thu fios gu

If you are deaf or have a hearing impairment, you can still communicate with the Council via Text Relay by dialling 18001 + telephone number:

Application Support Team  
01224 523470



## Sepideh Hajisoltani

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**From:** David Carmichael <David.Carmichael@SCOTTISHWATER.CO.UK>  
**Sent:** 09 June 2021 15:04  
**To:** Sepideh Hajisoltani  
**Subject:** Public Consultation - Draft Guidance to Planning Consents for the Aberdeen Multis

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sepideh,

I refer to your email dated 05 May 2021 regarding the proposed Draft Guidance to Planning Consents for the Aberdeen Multis.

Scottish Water would like to thank you for the opportunity to provide feedback and would make the following comments shown below:

Although there are no specific comments on the draft guidance, it is recommended that Aberdeen City Council or Developers contact Scottish Water at their earliest convenience should water or drainage work be carried out servicing any of the eight buildings, i.e. the pipework on the road/footpath out-with the Multi and the red, amber and green criteria.

Work carried out should confirm to the standards as indicated in the Scottish Water publications, '**Water for Scotland 4<sup>th</sup> Edition**' and '**Sewers for Scotland 4<sup>th</sup> Edition**'.

I trust that the above information is acceptable in line with your consultation. Should you require further clarification, please do not hesitate to contact me.

Yours Sincerely

David Carmichael  
Development Planner  
**(Working Mon - Wed)**  
Development Engagement Team  
Scottish Water  
Kingshill House, Arnhall Business Park, Westhill, Aberdeen AB32 6UF  
Mobile: 07785469988  
Mail to: [david.carmichael@scottishwater.co.uk](mailto:david.carmichael@scottishwater.co.uk)  
Web: [www.scottishwater.co.uk](http://www.scottishwater.co.uk)

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WANT TO KNOW MORE - EMAIL:  
[developmentoperations@scottishwater.co.uk](mailto:developmentoperations@scottishwater.co.uk)

**NEW**

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General

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Scottish Water

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## Full List of Responses

Response ID	Do you have any comments on 'the Draft Guidance to Planning Consents for the Aberdeen Multis'? - Add your comments here
ANON-TYWD-9GT6-J	NA
ANON-TYWD-9GTF-2	This appeal, which appears to be driven by crass political reasons, is a grave mistake and totally fails to understand the significance of these fine buildings to the history of Aberdeen. Once upon a time building high-quality council houses and flats incorporating local building materials designed by the City Architects' department was a source of civic pride to Aberdeen and the Labour Party should be particularly ashamed of supporting this appeal.
ANON-TYWD-9GTW-K	Complete eyesore. [REDACTED] [REDACTED] There [REDACTED] costing heaps to maintain and no one wants to live in them. Flatten them and build something modern
ANON-TYWD-9GT2-E	I think it is ridiculous. These buildings are an eyesore.
ANON-TYWD-9GT1-D	I think it's a ridiculous idea came up with from someone in Edinburgh. [REDACTED]
ANON-TYWD-9GTY-N	Hutcheon court is in huge need of refurbishment. Its like a time capsule to the 80's. The lifts are ancient and the main foyer is run down.
ANON-TYWD-9GTP-C	What a fuss Aberdeen City Council are making. Perhaps if they hadn't been soooooo busy with their own A listed headquarters they might have some time and money available for these buildings where real people live.
ANON-TYWD-9G5C-Z	Clear and informative.
ANON-TYWD-9G5D-1	These buildings are shocking the heating is to dear the windows are about 20 plus outdated
ANON-TYWD-9G53-G	Don't want the building to be missed from any work or maintenance which may be needed or that owners will be expected to pay more for repairs or maintenance because it is a listed building
ANON-TYWD-9G5F-3	Q. What about the useless, dilapidated security system? Is that allowed to be replaced or will the stairwell and corridors continue to be used for drugs and toilets?  Q . Will this be a good excuse for Aberdeen City Council to stop any refurbishment that is in most cases years and years overdue?

	<p>Q. Why are the buildings so shabby despite monthly fees going to the city authorities?  ( You can do the maths..... 60 pounds per month x household )  Will the fees be reduced in line with the lack of maintenance due to new planning consent?</p>
ANON-TYWD-9G5R-F	<p>On the whole I think it's about right until we actually see how it works going forward. I do think however that Satellite Dishes should be banned completely as they are very unsightly and do not enhance the properties one iota.</p>
ANON-TYWD-9G55-J	<p>I havent found any information thus far in the survey re traffic lights</p> <p>I also feel that mature non computer users have been squeezed out of accessing the survey</p> <p>The end date June 14 is only a few days short of the planned lifting of restrictions and should be extended as soon as dates are known</p> <p>Why are only us owners being involved in this survey?</p> <p>Details should have been sent in hard copy to all relevant residents NOT a link to website</p>