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Introduction	3	External	Emac Planning; Linlathen Estates (Tayside) & Scotia Homes	It is acknowledged that this will be updated to reflect the Reporter's examination report & recommended changes.	Agreed. Policy reference DS5 has been updated to reflect Examination Report and subsequent Plan as modified.
Introduction	3	External	Homes for Scotland	Homes for Scotland welcomes that Angus Council through Policy TC3 sets out how affordable housing will be secured for all development of 10 or more dwellings, or where a site is equal to or exceeds 0.5ha with the resultant affordable housing allowance being set at 25%. This reflects national planning policy. Moreover, Homes for Scotland would also commend the Council in not seeking to seek affordable housing contributions from sites of less than 10 units. It is also welcomed that Angus Council will look at flexible and innovative ways of delivering affordable homes, working in partnership with developers.	Support noted.
Introduction	4	External	Emac Planning;	Support the stated approach, not least as there may well be sites already	Support noted.

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			Linlathen Estates (Tayside) & Scotia Homes	allocated in the LDP, where the development appraisal undertaken at the time, would not have been able to take into account the financial requirements contained in this Supplementary Guidance.	
Introduction	3 & 4	External	Stewart Milne Homes	Note that this draft Supplementary Guidance supports policies DS5 "Developer Contributions" and TC3 "Affordable Housing" within the Proposed Angus Local Development Plan. Policy DS5 is a general policy and sets out that contributions may be financial, or in kind and will be proportionate in scale and kind to the proposed development and the tests set out in national policy and guidance. This is noted and welcomed but must be applied as per these sentiments.	Support noted.
Approach to Developer Contributions	5	External	Emac Planning; Linlathen Estates	Query whether the Supplementary Guidance should encourage pre-application discussion in relation to residential development, in order for the	No change. Angus Council's Development Management Charter already sets out

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			(Tayside) & Scotia Homes	<p>Planning Authority to confirm whether a site will be affected by cumulative requirements.</p> <p>In relation to affordable housing, if mixes are known and can be confirmed at the pre-application stages, this would greatly assist in designing and planning sites that meet the needs of the Council's affordable housing needs from the outset.</p>	<p>that pre-application discussions are welcomed so as to encourage high quality applications which fit well with the Local Development Plan and other policies to ensure they can be dealt with as efficiently as possible.</p> <p>Pre-application enquiries would involve other relevant Services, including the Housing Service as appropriate.</p>
Approach to Developer Contributions	5	External	Guild Homes and Suller & Clark	Support the approach to Developer Contributions however would welcome guidance where reductions may be considered appropriate, i.e. applications relating to listed buildings or instances where there are demonstrable extraordinary development costs.	<p>Support noted.</p> <p>It is considered that any reductions for developer contributions where extraordinary development costs are proven is already covered under Development Viability.</p> <p>Other issues such as listed buildings etc. can be factored into development appraisals.</p>
Approach to Developer Contributions	6	External	Stewart Milne Homes	Note and welcome that Angus Council recognise that commercial development can have its own impact on infrastructure and services and that there will be	Support noted.

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				contributions sought in respect to Transport Infrastructure and/or Open Space, biodiversity enhancement and green infrastructure.	
Approach to Developer Contributions	6	External	Emac Planning; Linlathen Estates (Tayside) & Scotia Homes	Clarification is sought on whether in terms of Commercial Development, the Supplementary Guidance applies to applications for change of use.	<p>Comments noted.</p> <p>For clarification, Page 5 of the Supplementary Guidance specifies that Developer Contributions may be for change of use proposals.</p> <p>In such circumstances the assessment of Developer Contributions would take account of existing uses and any intensification and resulting impact on infrastructure.</p>
Approach to Developer Contributions	6	External	Emac Planning; Linlathen Estates (Tayside) & Scotia Homes	On the reference to S42 applications, we would query whether the Supplementary Guidance should confirm the type of S42 applications which would be subject to this Supplementary Guidance, as for example, it would be unreasonable to apply the SG to application for the variation of a landscaping proposal.	<p>Comment noted.</p> <p>S42 applications will be assessed on a case-by-case basis. Whilst it would be inappropriate to prescribe all of the exact types of application which this Supplementary Guidance would apply to, the guidance for example the guidance would apply to time limited applications but not for</p>

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					example an application to change operational hours.
Approach to Developer Contributions	6	External	Emac Planning; Linlathen Estates (Tayside) & Scotia Homes	Concerned that the Supplementary Guidance requires the applicant to meet the costs of the preparation of the Legal Agreement, where this is being prepared by the Council, as the applicant does not have control over the cost or time spent on its preparation.	<p>Comment noted no change.</p> <p>The Supplementary Guidance provides clear, up-front requirements for developers and agents. As a result it should be possible in most circumstances to reach an early agreement.</p> <p>Angus Council's Legal Services have standard templates for legal agreements and therefore it should be possible to share these at an early stage with applicant's. In terms of the cost of preparing a legal agreement this is generally a standard cost but early engagement with the Council can help clarify matters.</p>
Approach to Developer Contributions	6	External	Stewart Milne Homes	The guidance sets out that where contributions cannot be secured through a planning condition, a Section 75 agreement or other legal agreement will be required. Stewart Milne Homes would	<p>Comments noted.</p> <p>The Supplementary Guidance sets out that only where a developer contribution cannot be secured through a planning condition in the</p>

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				<p>suggest that the Council and their legal advisors must at all opportunities, seek to control contributions through condition first, in line with Circular 3/2012. Section 75 agreements cause significant delay in the planning process, and whilst we acknowledge there is a need and a purpose for these agreements, control of contributions through conditions is the preferred method. Policy DS5 states that it will consider the cumulative effect of developer contributions on the economic viability of individual proposals. This is noted and welcomed however, the process of determining this should not be overly cumbersome and add delay in processing such applications.</p>	<p>first instance that a Section 75 or other legal agreement will be required.</p> <p>The preparation of the Supplementary Guidance is also intended to provide clear and concise details on the types of development likely to make contributions and to provide the calculations for specific developer contributions. This is intended to help all parties in the planning application process to ensure development and associated infrastructure is delivered whilst also ensuring there is sustainable economic growth.</p>
<p>Approach to Developer Contributions</p>	<p>6</p>	<p>Internal</p>	<p>Roads Service</p>	<p>Can changes to the Council's Road Standards be considered since previous permission, in particular car parking requirements.</p>	<p>Comment noted.</p> <p>Applications will be assessed on a case-by-case basis and therefore any changes to the Council's Roads Standards should be considered as part of the determination of the new application. It is not considered</p>

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					appropriate to include further detail in the Supplementary Guidance.
Approach to Developer Contributions	6	External	Guild Homes and Suller & Clark	<p>Support the stance taken within the draft Supplementary Guidance supported by the flow chart in Appendix 2 which confirms that where an extant permission exists and there is no net increase in house numbers the supplementary guidance on Developer Contributions and Affordable Housing will not apply. This position is confirmed by both the statements of intent contained in the body of the Guidance and confirmed by the flow chart in Appendix 2.</p> <p>Any attempt to seek developer contributions for extant consents where the principle of the proposal is not being altered and no increase in house numbers is being proposed is considered to be unreasonable.</p>	<p>Comment noted, however recognition that the wording as proposed set out a conflicting approach whereby the initial paragraph referred to a new assessment being required for all applications and the wording and flowchart suggesting that this would just apply to net units.</p> <p>Section reworded to provide clarification that a new assessment is required for all applications to ensure that these are assessed in line with current policy requirements however recognition that this assessment should take account of these on development viability.</p>
Approach to Developer Contributions	6	External	Stewart Milne Homes	Sites with Planning Permission - Angus Council sets out that they can revisit developer obligations where are an application seeking to alter the number	Comment noted.

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				<p>of units on site increases, or where non-residential use seeks additional gross internal space. Stewart Milne Homes whilst understanding the principle of this area of the guidance, urges Angus Council that all applications must be treated with an element of flexibility. Additional units may be being sought to ensure the site is viable in a changing market. The introduction of additional developer obligations may negate the benefit of the additional development. The test of scale and kind must be applied in these instances and early discussions with the development industry is essential to ensure there is a common understanding for the proposed changes to any consented site.</p>	
<p>Approach to Developer Contributions</p>	<p>6</p>	<p>Internal</p>	<p>Development Management</p>	<p>Section wording is contradictory and confusing.</p> <p>Support for policies and developer contribution requirements to be applied to all new planning applications unless development has commenced on site and there is no increase in units to ensure</p>	<p>Comment noted, however recognition that the wording as proposed set out a conflicting approach whereby the initial paragraph referred to a new assessment being required for all applications and the wording and flowchart suggesting that this would</p>

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				that they are assessed in line with current requirements.	just apply to net units. Section reworded to provide clarification that a new assessment is required for all applications to ensure that these are assessed in line with current policy requirements however recognition that this assessment should take account of these on development viability.
Approach to Developer Contributions	6	External	Stewart Milne Homes	How are Developer Contributions Secured - Stewart Milne Homes does not agree with the Council's introduction of a Planning Obligation Agreement. A suggested process would be Developer Obligation Memo's whereby the developer obligations are agreed as Heads of Terms prior to any application being recommended to Committee for approval or where an application is granted as delegated subject to condition or Section 75 or Section 69 agreement. The Council are also setting out within their SG that where a planning obligation	Comment noted. Amend sentence of final paragraph to specify that agreement on planning obligations will be required prior to determination. In relation to the time limit, developers will still receive planning permission, however, a time period will be included to ensure the planning condition is met. If this position is agreed prior to the determination of a planning application this should warrant ample time to conclude the obligation. This also adds in flexibility to

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				is required to be concluded before the granting of planning permission a time limit of 3 to 6 months is likely. Stewart Milne Homes would be concerned at the setting out of such timescales. What happens in the case that the obligations are not concluded within this specified time period? We welcome that the Council are looking to bring forward consents quickly, but don't agree with setting of timescales particularly if it ends up having a negative effect on a planning decision.	amend the condition if required.
Approach to Developer Contributions	7	External	Stewart Milne Homes	Object to the Councils' approach to index link contributions where a large development is to be phased and a Section 75 agreement has set contributions for the whole development. Indexation should not be applied.	No change. The use of an index link ensures that the value of the developer contribution matches the cost of provision. The draft guidance index linked contribution to Q1 2016. Moving forward developers will be clear what the appropriate index link factor is as the Council will publish an annual update of the rates within the guidance.

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Approach to Developer Contributions	7	External	Stewart Milne Homes	Do not accept Angus Council timescales to spend financial contributions as 10 years from payment of last tranche of monies. Financial contributions should be spent within 5 years from date of last payment should be applied.	<p>No change.</p> <p>Infrastructure in many cases will require to be front funded. This is a financial risk to the Council. Therefore to allow phased payments which provide flexibility for the development industry and certainty for the Council, it is important that a suitable time period is available in order to secure funds and to identify works.</p> <p>In addition, the level of development that takes place in Angus and in-particular the impact of cumulative development and its impact on infrastructure means the control to have a longer time period to secure funds is more beneficial for Angus Council.</p>
Approach to Developer Contributions	7	External	Emac Planning; Linlathen Estates (Tayside) & Scotia Homes	5 years would be preferred instead of the 10 years suggested.	<p>No change.</p> <p>Infrastructure in many cases will require to be front funded. This is a financial risk to the Council. Therefore to allow phased payments which provide flexibility for the development</p>

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					<p>industry and certainty for the Council, it is important that a suitable time period is available in order to secure funds and to identify works.</p> <p>In addition, the level of development that takes place in Angus and in-particular the impact of cumulative development and its impact on infrastructure means the control to have a longer time period to secure funds is more beneficial for Angus Council.</p>
Approach to Developer Contributions	7	External	Emac Planning; Linlathen Estates (Tayside) & Scotia Homes	As noted previously, some sites allocated in the LDP may not have taken account of the financial implications associated with this SPG. Therefore support the commitment to flexibility and for an assessment on a site by site basis as stated in the Supplementary Guidance.	Support noted.
Approach to Developer Contributions	7	External	Guild Homes and Suller & Clark	In terms of the Management of Developer Contributions, the Supplementary Guidance suggests contributions will be returned within 10 years if the money is not committed. This	No change. Infrastructure in many cases will require to be front funded. This is a financial risk to the Council. Therefore

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				seems an unreasonably long period, surely if contributions are required to make a development acceptable planning terms the need is imminent. As such it is suggested a period of 5 years is more reasonable.	<p>to allow phased payments which provide flexibility for the development industry and certainty for the Council, it is important that a suitable time period is available in order to secure funds and to identify works.</p> <p>In addition, the level of development that takes place in Angus and in-particular the impact of cumulative development and its impact on infrastructure means the control to have a longer time period to secure funds is more beneficial for Angus Council.</p>
Approach to Developer Contributions	7	External	Stewart Milne Homes	Development Viability Statements - Whilst Stewart Milne Homes would support this approach where a viability issue arose during the course of an application, Angus Council must ensure that any such financial appraisal work be treated in the strictest confidence. Market and business sensitive information cannot be allowed to become publicly available.	<p>Comments noted.</p> <p>Angus Council's Property Service are consulted on any Development Viability Statements submitted through the planning application process.</p>

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Approach to Developer Contributions	7	Internal	Housing Service	Whilst happy to use the word unforeseen we need to make it explicit that development of a listed building and the associated costs cannot be classed as unforeseen. Therefore the Housing Service would not be willing to consider waiving the affordable housing requirement for that reason alone. A sentence at the end of this paragraph to that effect would suffice.	Comments noted. Further clarification as requested has been included in the Supplementary Guidance.
Approach to Developer Contributions	7	Internal	Housing Service	Reword 4 th bullet to:- " <i>Reports detailing the nature, extent and financial implications of the unforeseen costs.</i> " Also wonder if Development Viability is being done in the most appropriate way at present? Should there be independence in the approach i.e. getting the Development Viability to do and the developer pays the cost?	Comment noted and amendment to text undertaken as requested. Angus Council's Property Service are currently consulted on any Development Viability Statements submitted through the planning application process. Any amendment to this process as suggested would need to be considered as part of a future review of this guidance.
Methodologies For Calculating Required Developer	8	External	Stewart Milne Homes	The guidance sets out that contributions may be sought for open space, biodiversity enhancement and green infrastructure for both residential and	Comments noted and agreed.

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Contributions				commercial development. Stewart Milne Homes would suggest that this should only be sought as a contribution by the Council where insufficient provision is identified on site through planning applications, or where it is being used to offset onsite provision that cannot be implemented on site.	
Methodologies For Calculating Required Developer Contributions	8	External	Stewart Milne Homes and Homes For Scotland	The Council have published average costs per unit of implementing parks and open space. These rates require to be justified not simply published and accepted as standard rates. Details of this are required to be set out clearly within the appendices of the Supplementary Guidance.	No change. The Supplementary Guidance provides detail from the Council's Landscape Services Team on how the rates have been calculated and where the rates have been derived.
Methodologies For Calculating Required Developer Contributions	8	External	Scottish Natural Heritage	Main recommendation is that the guidance contains more information as to how biodiversity enhancement and green infrastructure contributions (Policy PV1) can be provided.	Comment noted, no change. It is not considered appropriate to provide this detail within this guidance. The Council are currently undertaking an Open Space Audit & Strategy which will provide further guidance on deficiencies and opportunities to further develop

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					biodiversity and green infrastructure.
Methodologies For Calculating Required Developer Contributions	8	External	Scottish Natural Heritage	<p>Welcome the clearly quantified open space and play areas contributions (pg. 8), but the lack of similarly quantifiable developer contributions for biodiversity and green infrastructure (section 5 in the Area Tables) may lead to opportunities to achieve these being missed.</p> <p>Suggest that this guidance is updated when the Council's PAN on Green Networks is produced, and that the PAN identifies locationally specific green networks that developers can contribute towards.</p> <p>The Area Tables list contributions to schools but we suggest it could usefully identify specific aspects such as safe active travel routes to schools through green networks.</p>	Comments noted.
Methodologies For Calculating Required Developer Contributions	8	External	SportScotland	Wish to comment on the noted costs for 'Formal and Informal Play Space'. This is stated to include sports pitches, and the average cost is noted as £197 to create	<p>Comments noted.</p> <p>The Supplementary Guidance provides detail from the Council's Landscape Services Team (based on</p>

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				<p>100sq m of formal and informal play space. Sportscotland is normally involved in the provision of grass pitches where such pitches are compensation for the loss of pitches connected with planning proposals, and where our involvement and approach is supported by SPP paragraph 226. Our approach is set out in our planning guidance note - available here: http://www.sportscotland.org.uk/media/1887120/sportscotland?s-approach-to-planning-applications.pdf .</p> <p>In that note we advise that the average cost of preparing a grass pitch for a total size of 5656sq m (95m x 50m with 3m run offs) is £130,000. This equates to £22.98 per sq m, or £2298 per 100 sq m, well in excess of the £197 noted in the draft guidance. We do not consider that the Supplementary Guidance would have any bearing on agreeing legal agreements relative to compensatory pitch provision associated with planning applications so this is not likely to affect our normal involvement in pitch provision</p>	<p>current practice) on how the rates have been calculated and where the rates have been derived.</p> <p>The Council's Landscape Services Team have advised that the cost wouldn't include formal playing fields as these are included as informal play space which is what the costings were based on and would be better considered under the open space strategy.</p>

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				through the planning process, however we felt it was important to highlight this difference in cost.	
Methodologies For Calculating Required Developer Contributions	9	External	Scottish Natural Heritage	Support the inclusion of allotments where developer contributions can be used. Would welcome production of additional guidance/advice on allotment locations and where a contribution may be sought.	Support noted. The details on an allotment report and food growing strategy have not yet been finalised, therefore further detail for inclusion within the Supplementary Guidance is not currently available.
Methodologies For Calculating Required Developer Contributions	9	External	Stewart Milne Homes	Remove reference to provision for allotments from the Supplementary Guidance. Angus Council have not yet carried out the work to justify or back where there may be future need in this area. Until this work is undertaken, contributions cannot be sought as it would not meet the tests as set out within Circular 3/2012.	Comments noted. Whilst the details on an allotment report and food growing strategy have not yet been finalised it is considered relevant to retain the reference to allotments within the Supplementary Guidance. Additional guidance/advice may be published in due course regarding locations and possible contributions once the work is finalised.
Methodologies For Calculating Required Developer	9	External	Emac Planning; Linlathen	In relation to Core Paths, query whether it is reasonable for 'all' sites' to be required to provide suitable linkages. It may not	Comment noted. Agree to amend wording of second

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Contributions			Estates (Tayside) & Scotia Homes	be possible to create the link between the site and the core path, for perhaps, physical or ownership reasons and lengthy linkages may be costly and unviable.	paragraph under Core Paths.
Methodologies For Calculating Required Developer Contributions	9	External	Emac Planning; Linlathen Estates (Tayside) & Scotia Homes	Clarification is sought on whether the exemption relates to both sites developed solely for affordable housing and also to the 25% quota provided on mainstream sites.	For clarification, the exemption for affordable housing relates to both development solely for affordable housing as well sites with the 25% quota.
Methodologies For Calculating Required Developer Contributions	9	External	Guild Homes and Suller & Clark	In relation to allotments, it is requested that any additional requests for developer contributions towards the provision of allotments will be provided in draft form with an opportunity for public consultation.	The details on an allotment report and food growing strategy have not yet been finalised it is considered relevant to retain the reference to allotments within the Supplementary Guidance. Additional guidance/advice may be published in due course regarding locations and possible contributions once the work is finalised.
Methodologies For Calculating Required Developer	9	External	Guild Homes and Suller & Clark	In relation to Core Paths, it is considered that good planning support footpath linkages where possible should be achieved. Can guidance be provided at	Comment noted, no change. As the guidance states, due to the nature of the works being very specific

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Contributions				this time of the likely level of contribution per house if this were deemed to be required?	it is not possible to identify a standard methodology or level of contribution per house. However, it should be noted that these types of contribution are only likely to be applicable in a limited number of circumstances.
Methodologies For Calculating Required Developer Contributions	9	External	Guild Homes, Suller & Clark and Homes for Scotland	In relation to Education, the guidance is welcomed and the catchment area basis of contributions is very helpful and clear to understand. However, the Guidance confirms that the review of the Angus Council school estate has not yet been undertaken how then do Angus Council know what capital projects are required at this time?	Support noted. In relation to the review of the Angus Council school estate, an interim review has taken place with the Education Service looking at projected growth and current school capacities to identify future requirements.
Methodologies For Calculating Required Developer Contributions	9	External	Stewart Milne Homes	Education contributions should only be sought once it is clearly established the resultant development will take the operational school role over 100%. It is wholly unacceptable to take financial contributions towards a school that is not yet operating above its deemed capacity. This does not meet test of	No change. Developer contributions will only apply to those schools forecast to exceed 100% capacity as a result of development. To allow phased payments and the provision of infrastructure at the suitable time, developer contributions

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				Circular 3/2012.	need to be secured before the mitigation is required.
Methodologies For Calculating Required Developer Contributions	9	External	Guild Homes and Suller & Clark	Further there is a lack of clarity on where new build/extensions/reconfiguration/rezoning will be required. Can more detailed guidance be provided?	In a number of locations there are different options on how to mitigate development in the school estate. The exact requirements will be dependent on the circumstances at the time of considering a planning application. The guidance provides a breakdown of the costs associated with the mitigation.
Methodologies For Calculating Required Developer Contributions	10	Internal	Housing Service	Should listed buildings be an automatic exemption? Not sure if this has already been agreed elsewhere.	The principle of listed building exemption was agreed previously in Report 345/15.
Methodologies For Calculating Required Developer Contributions	10	Internal	Councillor Devine	Under Section 4.2, Exemptions, the 2nd bullet point states 1 bed units. The rest of the sentence is unclear as it could give developers an 'out'. This sentence should be a bit clearer or just left out. If there are special circumstances then they could be looked at sympathetically.	Add further clarification to sentence as per comment.
Methodologies For	10	External	Stewart Milne	The Primary Education contributions as	Comments noted.

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Calculating Required Developer Contributions			Homes and Homes for Scotland	set out on pg.10 of the Supplementary Guidance are not accepted. Not every primary school in Angus will set out a 0.23 pupil ratio requirement. Angus Council require to be clear on school rolls both existing and projected. In addition, the cost per unit for education requires to be backed up showing cost breakdown for new build provision, extensions and reconfiguration. This should be clearly identified within the appendix of the Supplementary Guidance document for clarity.	The 0.23 pupil ration is an average requirement used by the Children & Learning Directorate based upon background information, including projected rolls and information from the Scottish Futures Trust. The Council annually publish school rolls and capacities data, however moving forward data in relation to School Roll Forecasting will be published. As a result the Area Tables will be moved into an appendix at the end of the supplementary guidance to allow republication of this data in line with the School Roll Forecasts.
Methodologies For Calculating Required Developer Contributions	11	External	Stewart Milne Homes and Homes for Scotland	The Secondary Education contributions as set out on pg.11 of the Supplementary Guidance are not accepted. As with primary contributions above, not every secondary school within the Angus area will create 0.17 pupils ration requirement. Angus Council require to be clear on school rolls both existing and projected. In addition, the cost per unit for education requires to be backed up	Comments noted. The 0.17 pupil ration is an average requirement used by the Children & Learning Directorate based upon background information, including projected rolls and information from the Scottish Futures Trust. The Council annually publish school rolls and capacities data, however moving

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				showing cost breakdown for new build provision, extensions and reconfiguration. This should be clearly identified within the appendix of the Supplementary Guidance document for clarity.	forward data in relation to School Roll Forecasting will be published. As a result the Area Tables will be moved into an appendix at the end of the supplementary guidance to allow republication of this data in line with the School Roll Forecasts.
Methodologies For Calculating Required Developer Contributions	11	External	Homes for Scotland	The annual process undertaken by each planning authority of the Housing Land Audit (HLA) could be a useful basis for monitoring. Within the HLA, developers provide relevant, up to date information on market conditions and programming for sites within the effective, established and constrained land supply. This is a good example of positive cooperative working between the development industry and the Council, and could be used alongside accurate information from the council's Education department to build up a precise picture of capacity fill-up in relation to the scale and rate of development.	Comments noted.

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Methodologies For Calculating Required Developer Contributions	11	External	Guild Homes and Suller & Clark	Secondary education contribution the guidance confirms a "possible contribution or rezoning contribution" yet two major developers in Forfar and Monifieth have already had to agree to contribution towards secondary education. Can this anomaly be explained?	Comments noted. The response is correct in noting that recent developments in Forfar & Monifieth have provided developer contributions towards secondary education. Moving forward the school rolls etc will continue to be monitored by the Children & Learning Directorate with any developer contribution likely to be either for an extension or rezoning. The exact requirement will be dependent on the circumstances at the time.
Methodologies For Calculating Required Developer Contributions	11 & 12	External	Guild Homes and Suller & Clark	In relation Community Facilities & Transportation, the Supplementary Guidance at present provides insufficient detail to allow developer to make an informed decision regarding proposed sites. No financial information is provided; can an upper limit on the possible contributions per unit be suggested?	No change. In relation to Community Facilities only the extension to Arbroath Sports Centre has been identified as a project. There may be future development which will impact on the capacity of existing facilities and therefore these may be required to contribute to mitigate any impact. The full details on potential impacts are not yet available.

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					As is referenced in the Supplementary Guidance work programming and costings of strategic transport intervention projects is ongoing and therefore once finalised further guidance/advice may be produced. Local impacts will continue to be dealt with on a case-by-case basis.
Methodologies For Calculating Required Developer Contributions	11	External	Scottish Natural Heritage	The inclusion of Country Parks as a Community Facility is supported.	Support noted.
Methodologies For Calculating Required Developer Contributions	12	External	Stewart Milne Homes	Where community facility contributions are being sought, in particular reference to Arbroath Sports Centre, justification is required from Angus Council in respect to the existing capacity and the additional demands any new development within the settlement has created. A demonstrated need requires to be set out within the appendices of the Supplementary Guidance.	No change. Angus Alive have provided information that the impact of new development proposed within Arbroath will require additional capacity to be provided for the existing sports centre. The cost per unit provided is based on a recent project by Angus Alive to improve sports facilities in Montrose.
Methodologies For	12	External	Homes for	Homes for Scotland fundamentally	Comments noted.

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Calculating Required Developer Contributions			sCOTLAND	<p>object to developers contributing to facilities which are funded through general taxation, notably in this particular case Healthcare. Health care providers have a statutory duty to provide health care facilities. Whilst it is acknowledged that there is significant and growing private sector involvement in providing services, it is entirely-inappropriate for one sector of business to be asked to subsidise another. Moreover Angus Council states that in regard to this that it does not expect any contributions being required to extend to mitigating any current deficit in provision and will only seek contributions to effectively mitigate the impact of a proposed development. Even if the principle of this type of contribution was justifiable which is not the case here, Homes for Scotland would fundamentally question how the Council would ensure that this would be the case.</p> <p>Furthermore, there are fundamental practical problems, notwithstanding the objection to the principle. Healthcare</p>	

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				facilities are planned and run by a variety of mechanisms from Health Boards and Trusts through to GP practices, which are in effect businesses. There is no clarity in the Guidance as to who is determining the need for, provision of and timing of facilities to serve new development. No costs in this regard have been given by the Council.	
Methodologies For Calculating Required Developer Contributions	12	External	Tactran	Transportation Contributions should be sought where applicable towards strategic Park & Ride proposals as identified in the Tactran Regional Transport Strategy and to walking and cycle routes as identified in the Tactran Regional Transport Strategy(RTS)/Delivery Plan and the Angus Active Travel Strategy as well as safe routes to school.	Transport contributions will be sought where necessary for walking and cycling routes with inclusion of reference to active travel routes in the Transportation section. With regards to Park & Ride, the Local Development Plan Transport Appraisal noted that no modelling has yet been undertaken to identify the size or optimum location, or impact from development on these park & ride facilities in Angus and no costs for the provision of this service are available to warrant inclusion of this in the Supplementary Guidance.

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Methodologies For Calculating Required Developer Contributions	12	External	Stewart Milne Homes and Homes for Scotland	Transportation contributions as set out on pg. 12 set out sparse detail as to what may or may not require contributions. Whilst it is appreciated that every development will have a varying impact on network capacity, the Council particularly need to focus on strategic projects setting out clear guidance to developers from the outset providing developers with confidence to move forward or otherwise with development.	Comments noted, no change required. As is referenced in the Supplementary Guidance work programming and costings of strategic transport intervention projects is ongoing and therefore once finalised further guidance/advice may be produced.
Methodologies For Calculating Required Developer Contributions	12	Internal	Transport Team	Happy that the guidance makes a clear reference to the fact that developer contributions may be required to support additional bus services and that this requirement would be assessed on a case by case basis.	Support noted.
Methodologies For Calculating Required Developer Contributions	12	External	Scottish Natural Heritage	Recommend mention of strategic active travel routes as well as roads infrastructure under sustainability of development proposals, such as segregated strategic cycle networks. These could be a function of green networks.	Comment agreed. Amendment to include reference to strategic active travel routes will be included within text.

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Methodologies For Calculating Required Developer Contributions	13	External	Stewart Milne Homes	Welcome that Angus Council will look at flexible and innovative ways of delivering affordable homes, working in partnership with developers. Commitment is also required from the Council's housing teams to feed into the specific need requirements, as set out on pg.13 of the SG. If affordable mixes are known and can be confirmed at the pre-application stages, this assists developers in designing and planning sites that meet the needs of the Council's affordable housing needs from the outset.	Comments and support noted.
Carnoustie Area	18	External	Tactran	Transport contributions should not be limited to the A930 but also cover infrastructure/services for alternative modes to the car – including Park & Ride.	Requested change not agreed. Tactran have previously indicated that Monifieth would be the furthest east location for a Park & Ride facility. The Local Development Plan Transport Appraisal noted that no modelling has yet been undertaken to identify the size or optimum location for park & ride facilities in Angus and no costs for the provision of this service are available to warrant inclusion of this in

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					the Supplementary Guidance.
Forfar Area	20	External	Tactran	Transport contributions should not be limited to the A90 junctions but also cover infrastructure/services for alternative modes to the car – including Park & Ride.	Requested change not agreed. The Local Development Plan Transport Appraisal noted that no modelling has yet been undertaken to identify the size or optimum location for park & ride facilities in Angus and no costs for the provision of this service are available to warrant inclusion of this in the Supplementary Guidance.
Montrose Area	26	External	Tactran	Transport contributions should not be limited to the A90/A937 junction but also cover infrastructure/services for alternative modes to the car.	Requested change not agreed. The Local Development Plan Transport Appraisal noted that no modelling has yet been undertaken to identify the size or optimum location for park & ride facilities in Angus and no costs for the provision of this service are available to warrant inclusion of this in the Supplementary Guidance. The Regional Transport Strategy also doesn't make provision for such a facility at Montrose.

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					In addition, the Supplementary Guidance provides guidance for Transportation including the provision of infrastructure and towards additional bus service provision.
Montrose Area	26	Internal	Roads Service	Typo, should read, "A92 North Esk Road/Broomfield Road junction."	Comment noted. Error has been amended.
Appendix 1	28	Internal	Roads Service	In terms of clarity looks a bit squashed up to the top of the page.	Comment noted. Page layout altered as requested.
Appendix 2	29	Internal	Roads Service	What if answer to Q1 is no?	Comment noted. The question should not have included a No option.
Annexe A: Affordable Housing	31	Internal	Roads Service	Number of affordable housing quota: 25% of 20 = 5 units?	Comment agreed. Error has been amended.
Glossary	33	Internal	Housing Service	Mid-Market Rent, can you reword 1st line to read: <i>"Units let on Short Assured Tenancies or Private Residential Tenancies at a</i>	Comment agreed and amendment made as requested.

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				<i>discounted rent."</i>	
Glossary	33	Internal	Roads Service	Transport Infrastructure Improvements: Transport infrastructure is capitalised mid-sentence and sentence is unfinished.	Comment noted. Punctuation error has been amended.
Contacts	34	Internal	Roads Service	Road Service Postal Code = DD8 3WR	Comment noted. Contacts page has been amended.
Contacts	34	Internal	Angus Alive	Also do we need to go in as a contact in the contacts page?	Comment agreed. Contacts page has been updated.
General	n/a	External	Tactran	References to contributions should be sought towards Active Travel infrastructure in all of the Area Tables on pages 14; 16; 18; 20; 22; 24 and 26 and also inclusion of reference to contributions towards strategic Park & Ride proposals identified in the RTS and STPR on pages 16 (Brechin); 20 (Forfar);	The Local Development Plan Transport Appraisal noted that no modelling has yet been undertaken to identify the size or optimum location for park & ride facilities in Angus. In addition, no costs or impact from development for the provision of this service are available. Given the lack of detail in respect of strategic park & ride

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				and 24 (Monifieth – for Dundee East).	schemes at present it would not be appropriate to seek developer contributions for this requirement.
General	n/a	External	Scottish Natural Heritage	Welcome Angus Council's draft developer contributions and affordable housing supplementary planning guidance, and strongly support its requirements for open space, biodiversity enhancement and green infrastructure. These are regarded as essential infrastructure which can greatly contribute to quality of places and therefore peoples' well-being and an area's economic attractiveness.	Support noted.
General	n/a	Internal	Roads Service	General formatting during use of forward slash has defaulted to a fraction which is unclear for reader.	Comments noted and necessary changes have been made.
General	n/a	External	Guild Homes and Suller & Clark	Clarification on how the monitoring of the guidance will be undertaken. Confirmation that the monitoring and any amendments to the guidance will offer further opportunities for public consultation.	The Supplementary Guidance will be reviewed and updated alongside future Local Development Plan production.

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General	n/a	External	Historic Environment Scotland	Welcome the preparation of this guidance and confirm that there are no detailed comments to offer.	Comments and support noted
General	n/a	External	Scottish Water	No objection or comments to make on the content of the documentation.	Comments noted.
General	n/a	Internal	Angus Alive	As there has been a change in the environment for libraries provision in Angus with the ACCESS / Library integration, would it be pertinent to cover them off in some of the towns.	The reasons for the Council's to change the library / ACCESS Office integration is budgetary driven and therefore the situation is not as a result of development or being exacerbated as a result of proposed development. In this respect seeking a developer contribution for this change in provision would be contrary to Circular 3/2012.