

**Appendix 2a – Summary of Comments Received on Draft Design and Placemaking Supplementary Guidance and Angus Council’s Response Guidance**

<u>Section(s)</u>	<u>Page Number(s)</u>	<u>External or Internal Comment</u>	<u>Comment From</u>	<u>Comment</u>	<u>Response</u>
General			SNH	We were pleased to comment on the previous draft of this supplementary guidance in July 2016 and welcome this revised version, particularly the reference to the design process and place standard tool, and section 5 “Meeting our design requirements.”	Comments noted and welcomed.
General			SNH	Suggest the guidance also considers rural places. Some landscaping or boundary treatments can integrate a development well in urban areas, but are inappropriate for rural settings and vice versa. An illustration of new rural development/settlement edge showing good integration and connectivity within the rural landscape (such as boundaries of native hedges and trees lines) would be useful to include.	We have included examples of rural developments within section 5 of the document. Further design guidance is also contained in Angus Councils Supplementary Guidance on Countryside Housing which is cross referenced on Page 29. Whilst we would like to include a wider range of examples, the document has been prepared using the resources available to us and the examples used are considered adequate to convey the message intended.

General			Homes For Scotland	<p>Overall, we consider the document provides some useful additional guidance to assist developers and their design teams. In particular the case studies which are included are helpful.</p> <p>We note and welcome that the design requirements set out in Section 5 will be applied considerately recognising that some will be more or less applicable to different developments</p>	Comments noted and welcomed.
General			Homes For Scotland	Suggest that the document could be made more concise by removing reference to the need to comply with policies already in the development plan or other supplementary guidance on p. 24, 27 and 28.	It is considered that cross reference to other policy areas and guidance documents relevant to design and placemaking is beneficial in raising awareness of connections with other policy areas and guidance and the need to meet other requirements.
General			SNH	In the previous draft of this guidance, we welcomed the 'Designers summary and quality checklist' This is now omitted but we recommend its retention as this is a useful aide memoir for developers.	<p>Comments received on the previous draft highlighted the need for more guidance on how we expect developers to meet the principles of Policy DS3. This is addressed in Section 5 "Meeting our design requirements" of the revised SG. These requirements cover the different aspects of design quality and local distinctiveness and set out clearly how we expect these to be achieved.</p> <p>Section 3 of the document also now outlines the need to follow a design process, it provides guidance on what is required for each of the stages and</p>

					includes an Action Checklist which clarifies and reinforces what developers need to do as part of this process. It is hoped that these amendments will provide a more useful tool and clarity for developers than the previous checklist.
Section 2 - Planning Policy context	5	External	SNH	Include reference to other relevant policy areas (e.g. green networks/infrastructure)	Comments noted. Text added.
Section 3 - Creating successful places – follow a design process	8		SNH	Insert “and natural environment” in Key Message to ensure elements of the natural environment (such as trees, woodland and watercourses) are evaluated and included in consideration of the surrounding area. are	Comments noted. Text added.
Section 4 - Successful places in Angus – what makes them successful?	10-19		SNH	We recommend that these provide stronger examples of natural space and habitat creation, and climate change adaptation measures (energy efficiency/orientation, biodiversity and habitat connectivity, appropriate street trees).	The analysis of existing places in Angus seeks to illustrate the design qualities that make these places successful. These places are all different and whilst some may contain more qualities and features than others, the analysis highlights qualities such as natural space, habitat creation and biodiversity where they exist. The images included in Section 5 of the document also illustrate examples of such measures including energy efficiency/orientation, retention of built and natural features, biodiversity and use of street trees. Whilst we would like to include as many examples as possible, the document has been prepared using the resources available to us.
Section 5 - Meeting our design	20		SNH	Amend to “Retain, enhance and integrate existing important features such as hillocks... woodland, trees, hedgerows, walls and water	Comments noted. Text added.

requirements				bodies.”	
	21		SNH	Add specific mention of hedges as boundaries. Hedges can provide important contributions to quality of place and also provide multiple benefits (e.g. shelter, biodiversity, resilience).	<p>Although the guidance does not specifically mention hedges, it refers to quality landscaping which would include hedging if this form of boundary treatment was characteristic of the area.</p> <p>Hedges and drystone walls are however a particular feature of the rural area. This form of boundary treatment can help integrate new development into the local landscape. Additional text has therefore been added requiring the use of hedging or drystone walls in rural locations. Guidance is also provided on this matter in the council’s non-statutory Advice Note 21 which deals with the siting and landscaping of built development in the countryside.</p> <p>Hedges can also be a positive element in an urban setting but slow growth rate and difficulty in securing their maintenance and long-term retention can reduce effectiveness as screening for private areas. In those locations walls are the preferred means of securing screening of private areas.</p>
	21		Homes For Scotland	The first bullet point on p.21 states that proposals will be expected to be laid out in a block structure with any deviation from this requiring justification. We consider that this requirement is unnecessarily restrictive and precludes consideration of other design approaches which have delivered successful	Our place analysis identifies a perimeter block layout as a key feature of successful places in Angus. This structure allows the principles of permeability, active frontages and private spaces enclosed to the rear to be achieved. This structure can also help achieve welcoming streets that are

				<p>attractive places. It therefore limits potential design solutions and it has not been explained why this gridiron approach to design has been elevated above other approaches. We would suggest this is instead included as a possible design approach which has been successful elsewhere in Angus rather as a specific design requirement.</p>	<p>overlooked and feel safe to use. The use of perimeter blocks is also supported by "Designing Streets".</p> <p>Notwithstanding, the document provides flexibility where it is justified. The guidance does not require a grid iron approach, it indicates that blocks need not be uniform and can vary in shape and size. This will allow the structure to respond to its context which is fundamental to good design.</p> <p>The design rational for any development should be explained and justified through a Design Statement based on a site and context appraisal.</p>
	21		Homes For Scotland	<p>Similarly, the fifth bullet point of p. 21 is highly prescriptive. We consider that the design of the site is best evaluated in the round with other considerations also taken into consideration. Such prescriptive policies therefore reduce the extent of planning judgment an Officer can use. This can prevent an officer from weighing up different elements of a development proposal and ultimately could make the delivery of new homes more challenging.</p>	<p>The provision of an appropriate mix of house sizes, types and tenures is a requirement of Policy TC2: Residential Development of the Angus Local Development Plan. The purpose of the SG is to clarify ALDP policy, not to change it.</p> <p>A common characteristic of successful places in Angus is the range of buildings, house types, sizes, tenures and plots that they contain. This provides variety and interest in terms of townscape and also helps create sustainable mixed communities by providing for different needs and affordability.</p> <p>Notwithstanding, the document provides flexibility and where it is justified. The design rational for any development</p>

					should be explained and justified through a Design Statement based on a site and context appraisal.
	22		Homes For Scotland	In relation to the third bullet point on p. 22 we consider that the requirement for a minimum garden size of 100sq.m is unduly onerous and would limit the style of houses which could be constructed. For example mews houses would not be able to achieve such a garden size and achieving this would also reduce the affordability of housing. Similarly, the requirement for the size of the amenity space to reflect the floorspace internally is not clearly explained and successful, attractive developments can be achieved without meeting this standard. We would suggest the appropriate garden size should instead be considered at the pre-application and application stage having regard to the specific context of the development.	<p>The reference in the SG to 100sqm private garden ground is caveated with the word 'generally'. The 100sqm appears in current council guidance and has been applied flexibly having regard to the location and type of housing proposed.</p> <p>The SG indicates that the reference to floorspace correlating to private garden space is related to larger developments. It seeks to ensure that, in general terms, larger family type houses have larger private garden areas. The requirement identified in the SG is for a range of garden sizes.</p>
	22		Homes For Scotland	In relation to the fourth bullet point on p. 22 we consider that this guidance should be incorporated into SPG to allow it to be subject to consultation. It would also help to simplify the Angus Planning framework by incorporating design guidance into one document.	<p>Circular 6/2013: Development Planning provides guidance on the type of topics and detail that should be included in Supplementary Guidance. It also recognises that non-statutory planning guidance will continue to have an important role in providing detail on a range of subject areas.</p> <p>The council intends to review its suite of Planning Advice Notes and that will include a review of guidance on privacy standards. That non-statutory guidance will be subject of appropriate consultation.</p>

					Meantime the council remains of the opinion that detailed guidance on privacy standards such as window to window distances are most appropriately dealt with through non-statutory guidance. This allows them to be applied in a flexible manner having regard to site specific circumstances.
	23		SNH	We welcome the emphasis on open space and landscaping as integral to the overall layout of place. We recommend adding 'connections to green networks' as these can provide active travel connections as well as many other multiple benefits such as habitat creation and recreation. Good place design should ensure these networks are in the right locations, multi-functional and attractive.	Comments noted. Text added.
	25			In relation to bullet point 4 on p. 25 we consider the restriction on the use of cul de sacs is overly prescriptive. They could well be the only design solution for smaller developments and towards the edge of larger developments. We consider this sentence should be deleted.	A key quality of successful places in Angus is their network of connected streets and routes which allow connectivity between different areas and spaces and through routes for pedestrians and cyclists. This principle is supported by "Designing Streets" whilst the use of culs-de-sacs is discouraged.  Notwithstanding, the document provides flexibility and states that they will not normally be acceptable. The design rational for any development including the layout and street pattern should be explained and justified through a Design Statement based on a site and context appraisal.

