

**APPENDIX 2: PROPOSED RESPONSES TO CONSULTEE COMMENTS ON THE DRAFT DEVELOPMENT PLAN SCHEME AND PARTICIPATION STATEMENT (DPS AND PS) 2023**

<b><i>Respondent Name</i></b>	<b><i>Individual or Organisation</i></b>	<b><i>Respondent ID</i></b>
No name given	Individual	<b>DPS001</b>
No name given	Individual	<b>DPS002</b>
Mr. Grieve	Individual	<b>DPS003</b>
Ms. Bain	Organisation	<b>DPS004</b>
Mr. Thornton	Individual	<b>DPS005</b>
Carnoustie Community Council	Organisation	<b>DPS006</b>
Ms. Kyle / Sports Scotland	Organisation	<b>DPS007</b>
Mr. Mcmillan	Individual	<b>DPS008</b>
No name given	Individual	<b>DPS009</b>
Angus Pylons Group	Organisation	<b>DPS010</b>
Mr. Strachan	Organisation	<b>DPS011</b>
Ms. Matthews	Organisation	<b>DPS012</b>

<b><i>Respondent Name</i></b>	<b><i>Individual or Organisation</i></b>	<b><i>Respondent ID</i></b>
Mr. Stevenson / Historic Environment Scotland	Organisation	<b>DPS013</b>
No name provided.	Individual	<b>DPS014</b>
DJ Laing	Organisation	<b>DPS015</b>
No name provided.	Individual	<b>DPS016</b>
Mr. Jenkins	Organisation	<b>DPS017</b>
Gowanbank LLP	Organisation	<b>DPS018</b>
No name provided.	Individual	<b>DPS019</b>
Ms. Leece / Ogilvie Homes	Organisation	<b>DPS020</b>
Ms. Donnan	Individual	<b>DPS021</b>
Mr. Merry	Individual	<b>DPS022</b>
Ms. Merry	Individual	<b>DPS023</b>
Mr. Grubb	Individual	<b>DPS024</b>

Ms. McKay	Individual	<b>DPS025</b>
Ms. Prain	Individual	<b>DPS026</b>
No name provided.	Individual	<b>DPS027</b>
No name provided.	Individual	<b>DPS028</b>
Ms. Millar	Individual	<b>DPS029</b>
Ms. Gibson / Homes for Scotland	Organisation	<b>DPS030</b>
Guild Homes	Organisation	<b>DPS031</b>

Ms. McDonald	Individual	<b>DPS032</b>
Ms. Kidd	Individual	<b>DPS033</b>
No name provided.	Individual	<b>DPS034</b>
Ms. Stuerck / Tactran	Organisation	<b>DPS035</b>
Mc. Dryburgh	Organisation	<b>DPS036</b>
Mr. Maclean	Organisation	<b>DPS037</b>
Henry Young (Cairn Timber) Limited	Organisation	<b>DPS038</b>

Theme	Summary of Response	Council Response	Proposed Changes to the DPS	Respondent ID(s)
Clarity of ALDP (2016) Position	Several respondents stated they had some difficulties surrounding the position of ALDP 2016 and NPF4 until the new LDP is adopted	The Council, to aid comprehension of this point will reword the paragraph referred to by the respondents to clarify the position.	The Council has made reworded the DPS and PS to clarify the position of NPF 4 and the ALDP (2016) position on page 6 of the document. The following text has been added after the first sentence in the first paragraph of the document to state:  "The ALDP (2016) is still part	DPS002 DPS009 DPS014 DPS017 DPS029

			<p>of the Development Plan for Angus and will still be used in the assessment of planning applications. However, where there are differences/conflicts between the policies in NPF 4 and the ALDP (2016), legislation states that the newer Plan will take priority, which in this case is NPF 4. This will be the case for the next few years until such times that the ALDP (2016) is replaced by the new Local Development Plan for Angus. The weight to be applied to ALDP (2016) policies will be made on a case-by-case basis by the planning officer assessing the planning application."</p>	
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Clarity of diagram on page 6	Several comments from respondents were made regarding the lack of clarity from the diagram on page 6. Whilst other respondents expressed that they understand the planning system but this diagram does not make it any easier.	The comments from respondents are appreciated and the Council will revise the diagram showcasing the new structure of the Statutory Development Plan in Scotland where possible.	The diagram on page 4 of the DPS and PS document has been changed to detail the new structure of the Statutory Development Plan in Scotland and to respond to the comments made upon it	DPS005 DPS004 DPS006 DPS012 DPS017 DPS034
Need for physical and non-digital engagement/ participation	Several respondents refer to the fact that the publication and consultation on the draft DPS and PS was undertaken purely through social media and digital methods (and in their opinion was not done very well), causing problems for those who do not have access to digital means.	The comments of the respondents are appreciated; however, due to the timeframe for publication and consultation on this DPS and PS it was not possible to carry out traditional methods of engagement and consultation. However, the main stages of LDP preparation process will undertake a vast range of methods for engagement and collaboration on the plan, including face-to-face meetings and other non-digital methods where appropriate. The comments received on how people wish to be engaged and consulted upon as part of the DPS and PS consultation will help to further shape the Council's Consultation and Engagement Strategy for the LDP and consideration of engagement methods such as notices in village halls, supermarkets, leaflets,	The Council are of the view that no changes are required to be made to the DPS and PS in this regard.	DPS002 DPS009 DPS010 DPS017 DPS021

		newsletters will be considered further in that document and the DPS and PS 2024 will update the engagement methods etc in that years participation statement.		
Complex language/lack of information clarity	<p>Two respondents were of the view that the draft DPS and PS document was too complex and jargon heavy, instead preferring plain English to be used.</p> <p>Other respondents noted that certain technical terms were not explained well enough such as Gatecheck, Regional Spatial Strategy, Evidence Report/Gathering.</p>	The Council understands the comments of the respondents and agrees that sometimes planning documents are quite difficult to follow and contain a lot of technical terms and jargon. Sometimes this is impossible to completely remove as the terminology comes from Government legislation and guidance. However, the Council will review the document and try to simplify complex language further before finalising the DPS and PS.	The DPS and PS, where appropriate, has been reviewed and simplified to respond to these comments. These changes relate to language, technical terms, and other planning jargon.	DPS005 DPS009 DPS012 DPS014 DPS017 DPS031 DPS033 DPS034 DPS038
Document Viewing Issue	One respondent indicated that they were not able to view the draft DPS and PS document so could not proceed with the survey.	The Council is disappointed to hear that the respondent had issues accessing the document, and unfortunately, the respondent did not contact the Council to notify us of these issues, as we could have sent out the DPS and PS, as well as the consultation questions in a different format.	The Council is of the view that no changes to the DPS and PS required in this instance.	DPS001
Call for Ideas Query	Several comments expressing concern over the lack of information	There is no statutory requirement to have a Call for Sites stage. However, any Call for	The Council are of the view that no changes are required to be made to the	DPS008 DPS004 DPS015

	surrounding a Call for Ideas/Sites stage and that there needs to be developer input into this gathering of evidence.	Ideas/Views/Sites would be undertaken as an early part of the preparation of the Proposed Plan, and this is noted on page 17 of the draft DPS, which indicates that the Call for Ideas/Sites may occur during Q2 2025 – Q3 2027, which is the timeframe for the production of the Proposed Plan.	DPS and PS in this regard.	DPS020 DPS030 DPS036 DPS037
Changes to list of stakeholders/people to be engaged with	Several respondents state that that essential statutory groups were not included in the list of groups to be engaged/consulted.	<p>The Council would like to thank the respondents for pointing this error out and we will review the list of statutory consultees before the DPS and PS 2023 is finalised and adopted.</p> <p>The Council would also like to clarify that Community Councils also have the opportunity to be involved in the preparation and submission of Local Place Plans which require to be given due consideration in the LDP process.</p>	The list of Statutory Consultees has been updated to include Community Councils and local developers on page 14 of the DPS and PS document.	DPS002 DPS003 DPS006 DPS012 DPS015 DPS031
LPP Information	Three respondents made comments regarding the clarity of Local Place Plan Information and how the Council intend to provide assistance throughout this process	The DPS and PS will be reviewed in light of this comment to ensure that there is clarity on the issues the respondent points out.	The LPP statement in the draft DPS and PS has been reviewed and amended. A new sentence and a hyperlink to the Council web site on Local Place Plans to the end of the fifth paragraph on Page 5 to read:	DPS015 DPS031 DPS033

			<p>“The Council have further information and guidance on LPPs on our website <a href="#">here</a>, including the invitation to prepare these plans, information, guidance, and a template for constituted community groups to follow if they do wish.”</p> <p>The hyperlink will be activated by clicking on the word ‘here’ in the text above.</p>	
Site Specific Matters	<p>Comments from several respondents expressing that they would like to be kept up to date with local sites in their area as they are concerned about potential development and want to be involved/have their say in the nature of development.</p>	<p>Although the comments from the respondents are noted, the DPS and PS are just a factual document indicating the stages of the preparation of the next Local Development Plan, the timeframe for that and how people will be engaged and consulted upon during the preparation of the Plan.</p> <p>The concerns from residents are more applicable and relevant to the proposed plan stage of the LDP process; however, we will add those respondents to our mailing list that have requested to be added, and this will keep them informed of</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	

		the progress of the next Plan and where their views can be made.		
Queries around detailed engagement	<p>Several comments from respondents have queried how and when they will be able to get involved moving forward with the LDP process.</p> <p>In particular, <b>DPS029</b> and <b>DPS036</b> indicate that the engagement of key stakeholders and agencies is not referred to enough in the DPS and PS document.</p>	<p>The Participation Statement gives general information on how we will involve, engage and collaborate with a wide range of groups and individuals as we move forward through the various stages of the Local Development Plan process.</p> <p>However, the Council will use the detailed comments received on the draft DPS and PS on how people wish to be engaged and consulted upon as part of the next Local Development Plan consultation to further shape the Council's Consultation and Engagement Strategy for the Local Development Plan and clarity surrounding specific timescales of engagement processes will be communicated in that document and in next year's DPS and PS.</p> <p>Key stakeholders, for instance, will also be involved and engaged with the preparation and production of the Evidence Report and will be invited to meetings to discuss the evidence required, evaluation of it and so on in due course and in line with the timetable within the DPS</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p> <p>However, the Council have taken on board the comments surrounding engagement and will tailor the Consultation and Engagement Strategy and subsequent related activities to these comments and we will be setting up the first range of engagement and collaboration sessions with those stakeholders, organisations, members of the public and other groups and individuals specified in legislation over the next year in relation to the preparation of the Evidence Report.</p>	<p>DPS002 DPS006 DPS007 DPS009 DPS012 DPS020 DPS022 DPS027 DPS029 DPS030 DPS031 DPS036 DPS037</p>



		and PS itself.		
	The responses from <b>DPS002</b> and <b>DPS006</b> state that the Council must ensure that public and community groups / councils are involved from the beginning of the processes.	The Council has invited constituted community groups to prepare Local Place Plans, and those who have signed up to the mailing list will receive updates on the progress of the new LDP and any Local Place Plans which have been registered, where appropriate.	The list of Statutory Consultees has been updated to include Community Councils and local developers on page 14 of the DPS and PS document.	DPS002 DPS006
	The response from <b>DPS012</b> indicates that the feel it is difficult to understand how the overarching principles of the engagement and consultation methods will work in practice.	The Council acknowledges the point the respondent makes and is of the view that these principles can be reviewed and amended when developing the consultation and engagement strategy for the new LDP, and this will be published on the Council's website and notified to those on the LDP consultation database when it is available for viewing.	The Council are of the view that no changes are required to be made to the DPS and PS in this regard.	DPS012
	The response from <b>DPS027</b> states that:  "As it is not clear the effort / time required for an individual to meaningfully contribute to any of the stages I am concerned that I	The Council will ensure that a range of methods, varying between in-person and online, will occur throughout this process to allow for as many people as possible to get involved in the process. This will be taken on board when developing further consultation and	The Council are of the view that no changes are required to be made to the DPS and PS in this regard.	DPS027

	would not have adequate free time to engage with the various stages."	engagement methods.		
	<p>The response from <b>DPS038</b> relates to the input that will be needed from their organisation and when this will take place.</p> <p>This respondent also stated that their preferred method of contact would be directly through email or by letter.</p>	The Council will contact the respondent on the stages where we need to engage and collaborate during the preparation of the next Local Development Plan, using their preferred means of contact.	The Council are of the view that no changes are required to be made to the DPS and PS in this regard.	DPS038
Miscellaneous Comments	The response from <b>DPS001</b> indicated that they would have liked to have a summary explanation of Local Development Plans in the email inviting responses to the survey.	The Council appreciates the respondent's comment and will take this into account when distributing emails in the future.	The Council are of the view that no changes are required to be made to the DPS and PS in this regard.	DPS001
	<p>The response from <b>DPS010</b> suggests a change to the text in paragraph 2 on page 9 of the draft DPS and PS to state:</p> <p>"The Evidence report is not supposed to concentrate on specific areas, however the</p>	<p>The Council appreciates the respondent's suggestion; however, the Council is content with its wording within this section.</p> <p>However, for the information of the respondent, it is only the Scottish Governments LDP guidance that states Evidence Reports are not to</p>	The Council are of the view that no changes are required to be made to the DPS and PS in this regard.	DPS010

	<p>Proposed Plan will identify a spatial strategy and areas for development within the Angus area, heavily influenced by the information and evaluation of data gathered in the Evidence Report."</p>	<p>consider sites or site locational issues within it. This is not actually stated in the primary legislation or the Local Development Plan Regulations 2023.</p>		
	<p>The Response from <b>DPS012</b> indicates that the position of NPF4 in assessing planning applications is still to be determined by an ongoing legal case.</p>	<p>The Council would point out that this legal case is ongoing and has no relevance to this DPS and PS at this present time as it a challenge against the interpretation of NPF 4 and a decision taken on a planning application in West Lothian and the Court case has not been heard at the time of writing the DPS and PS.</p> <p>Should the Court make its decision in 2024, then any changes to how NPF is to be interpreted will be appropriately updated in the DPS and PS 2024.</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS012</p>
	<p>The Response from <b>DPS017</b> states that their community would like more information and/or a presentation from the Council to help understand the LDP process.</p>	<p>The comments of the Respondent are noted, and the Development Planning Team will contact the community in question to arrange a session with them on the process for the next LDP in Angus.</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard</p>	<p>DPS017</p>

	<p>Two respondents provided contradicting comments regarding the summarised timetable (page 12 of Draft DPS) – one saying it is too vague with too little information, and the other stating it could be more concise.</p>	<p>The Council appreciates the views of the respondent in this matter. However, only two respondents made these comments and the rest of the respondents indicated that the summarised timetable was deemed adequate, easy to understand and provided sufficient information.</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS017 DPS028</p>
	<p>Several respondents expressed the view that the Council should present a “coherent Site Assessment Methodology” and that it will require significant engagement with relevant stakeholders and development.</p> <p><b>DPS015</b> inquired about the Council's intention to prepare this Site Selection/Assessment methodology with developers prior to publication of the Evidence Report or will they only be able to comment during formal consultation periods?</p>	<p>The views of the respondents are noted. However, the site selection methodology is not for the DPS and PS to address and is part of the Evidence Report and the Gatecheck processes. The respondents will have ample opportunity to help shape that site selection methodology going forward.</p> <p>It is the Council's intention to collaborate with the development industry (including house builders and infrastructure providers) during preparation of the Evidence Report</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS015 DPS020 DPS030 DPS036 DPS037</p>

	<p><b>DPS037</b> indicated that an effective way for communicating updates and positions for the next LDP process would be through monthly newsletters, as Aberdeenshire Council use this method and it is deemed very useful.</p>	<p>The Council appreciates this suggestion from the respondent and will consider this as an option for updating interested parties on the progress of the next LDP.</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS037</p>
<p>Concerns around timescales for LDP</p>	<p>Several comments related to the fact that the Council have presented timescales which are too delayed or that they will not be adhered to.</p> <p><b>DPS030</b> and <b>DPS037</b> add that that in line with Government guidance, the Council should have our new style LPD adopted by May 2028.</p> <p><b>DPS031</b> is also of the view that the Council has not left time for modifications to the Proposed Plan after Examination – they would like to know why this is.</p>	<p>The comments of the respondents are appreciated. The timescales which have been presented in the Draft DPS and PS have been estimated in terms of workload planning, current resources and the extensive new, additional and unfunded requirements of the new LDP process. These timescales are subject to change, and any future amendments will be addressed in subsequent DPS and PS documents.</p> <p>The Council is content, based on its extensive experience of implementing the Reporters Recommendations from the Examination Report into the adopted LDP, of the timetable for this stage in the LDP process.</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS006 DPS012 DPS030 DPS033</p>

Wider Strategies	The respondent advises that the consideration of the Regional Transport Strategy during the LDP Process and state that it is not referred to heavily enough in the Draft DPS and PS	The comments of the respondent are noted; however, the purpose of the DPS and PS is to set out the timeframe for the production of the next Local Development Plan, the stage involved in that, and how people can be involved in the LDP preparation. There is no requirement to list every single strategy and document that is relevant to the next LDP. That is for the Evidence Report and Proposed Plan stages to address.	The Council are of the view that no changes are required to be made to the DPS and PS in this regard.	DPS035
	Several comments requiring more information on the role and position of the Regional Spatial Strategy in the DPS and PS document	The comments of the respondents are appreciated. The DPS and PS will be amended to provide more information on the position of the Regional Spatial Strategy.	More information has been added to the DPS and PS regarding the regional spatial strategy at the end of the third paragraph on page 5 to read:  "Whilst initial discussions with adjoining Council's in the Tayside area have taken place, further, more detailed work on preparing the Regional Spatial Strategy is expected to commence once statutory guidance has been published by Scottish Government. The anticipated timescale for publication of this guidance	DPS012 DPS015 DPS031

			is early 2024"	
Involvement in Evidence Report and LDP Process	<p>A number of Respondents expressed their willingness to be involved in the Evidence Report stage to provide relevant data and information that the Council may not have access to otherwise.</p> <p><b>DPS031</b> would like to know who will be consulted on the draft evidence report</p>	<p>The Council would refer the respondent to The Town and Country Planning (Scotland) Act 1997 (as amended), which specifies who has to be formally engaged and consulted upon during the preparation of a Local Development Plan. The DPS and PS on page 13 outlines who will be involved, engaged and consulted upon in the preparation of the next Local Development Plan for Angus</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS012 DPS013 DPS031 DPS033 DPS035 DPS037</p>
General Housing	<p>Several Respondents raised issues related to the changes brought forward by the new planning system and NPF4 which will impact housing numbers, supplies, sites, site selection methodologies, and other approaches to housing delivery. Comments were concerned around the lack of information in the DPS and PS document regarding how and when relevant processes and engagement will take place with developers and other stakeholders.</p>	<p>The comments of the respondent are noted; however, the purpose of the DPS and PS is to set out the timeframe for the production of the next Local Development Plan, the stages involved in that, and how people can be involved in the LDP preparation. It is the Council's intention to collaborate with the development industry (including house builders and infrastructure providers) during preparation of the Evidence Report to ensure the evidence base we have is as robust as possible.</p> <p>However, there is no requirement to</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS015 DPS020 DPS030 DPS031 DPS036 DPS037</p>

		<p>detail every process involved gathering information for housing in the DPS and PS document, these will be discussed when and if necessary, with relevant parties.</p>		
	<p>Many respondents would like to clarify position of sites which have been previously discussed or submitted to the Council or would like to know how and when they can submit sites for consideration.</p>	<p>The Scottish Government, in their LDP Guidance, states that sites cannot be considered until the Gatecheck process is complete and that the Council are allowed to progress to the Proposed Plan stage of the LDP process.</p> <p>The Council would also like to point out that the Call for Views/Ideas/Sites only appears in the Governments LDP Guidance and is not a statutory requirement for the Council to undertake.</p> <p>Should the Council decide to undertake a Call for Views/Ideas/Sites, then this will be noted in a future DPS and PS and the timeframe for that stage.</p> <p>However, the Council would be content for landowners/developers to make the Council aware of any sites they have, control over, interest in or actual ownership of so that we have an accurate picture of housing land information in</p>	<p>The Council are of the view that no changes are required to be made to the DPS and PS in this regard.</p>	<p>DPS015 DPS020 DPS030 DPS031 DPS036 DPS037</p>



		<p>Angus. If developers wish to take this opportunity to do so then we would be grateful if they can email the LDP mailbox (<a href="mailto:ldp@angus.gov.uk">ldp@angus.gov.uk</a>)</p> <p><b>However, and for the avoidance of doubt, this is not an opportunity for any landowner or developer to submit sites for consideration in the Proposed Plan. Any landowner and/or developer doing so will have the submission returned to them and advised that we cannot look at any site till the Reporter has concluded the Gate check process and allowed the Council to progress to Proposed Plan.</b></p>		
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