

APPENDIX 3: DETAILED COMMENTS TO THE DRAFT DEVELOPMENT PLAN SCHEME AND PARTICIPATION STATEMENT 2023 AND QUESTIONS ASKED ON THE DOCUMENT AND HOW PEOPLE WISH TO BE INVOLVED IN THE PREPARATION OF THE NEW LOCAL DEVELOPMENT PLAN FOR ANGUS

This appendix provides the full detail of the responses to the draft Development Plan Scheme and Participation Statement 2023, which were grouped and summarised in Appendix 2 into themes. The themes are also replicated here to make it easier for Members, those who responded to the consultation, and members of the public, to understand which comment has been grouped and then summarised under each theme. The colour of the themes has also been applied to the table. These comments are as people provided them to the Council during the consultation. The specific questions that were asked are also provided at the end of this appendix for information.

Need for physical and non-digital engagement/ participation	
Clarity of diagram on page 6	
Complex language/lack of information clarity	
Site Specific Matters	
Concerns around timescales	
Involvement in Evidence Report	

ALDP 2016 position clarity	
LPP Info into DPS	
Document viewing issue	
Miscellaneous Comments	
General Housing	

Reason for Involvement*	
Groups involved in lists and engagement (CCs and developers)	
Call for Sites/Ideas	
Queries around detailed engagement	
Wider Strategies	

*No need for Council response to comments under this theme, but the reasons for involvement will help to shape our engagement and consultation processes moving forward.

Respondent Name	Respondent ID	Question No.	Respondent Comment
No name provided Email address provided.	DPS001	4	it would be helpful to have a lay summary of what you mean by a local development plan that comes even before this survey - e.g in the email inviting people to respond etc.
		4	"not sure if the issue is at my end but when I try to open the pdf of the draft development plan I get an error message and can't open or view it - I have tried on two different devices and on chrome and edge and get the following message 'the site can't provide a secure connection'. Therefore, I can't proceed with the survey."
		5-8, 11-25	I can't proceed with the survey - unable to view draft ldp
No name provided. Only email address provided.	DPS002	7	Need clearer statement on how NPF4 supersedes LDP16
		12	Need to make sure public and community groups are involved from the beginning
		15	Community councils and some other groups are not on the specific group list
		16	Need to have face to face meetings as well as online as not everyone can get online
Mr. Grieve	DPS003	15	although the Community Councils are included in many of the listings, they are not mentioned amongst the main groups of consultees in the first list provided.
		25	it will be vitally important to encourage sustained local participation through the active involvement of the Community Councils.
Ms. Bain	DPS004	6	We think this could be simplified and clearer to help those not involved in planning to understand this. At present it is a bit busy.
		12	It would be useful to know whether the Council intends to hold a Call for Ideas / Call for Sites following Gatecheck. Is this included in the Q2 2025-Q3 2027 Plan preparation including engagement?
Mr. Thornton	DPS005	5/5.1	Documents complex, plain English version would be helpful
		6	Function of arrowed circle not clear, four small light blue diamond shapes not labelled

		7, 8, 11	In relation to questions 7, 8, and 11 "Complex and jargon heavy"
Carnoustie Community Council	DPS006	6	It's not the easiest diagram to understand. We understand the process but its not a very helpful diagram.
		12	You won't manage to stick to the timetable !
		17.1	As a Statuary Body we are obliged to get involved and represent our constituents in this important process.
		21	We expect to be consulted throughout the whole procedure.
Ms. Kyle / Sport Scotland	DPS007	17.1	As the national agency for sport, and in line with this remit, sportscotland requests involvement in the preparation of policy relating to spaces for sport and physical activity in Angus. We're happy with the approach set out in the development plan scheme and to be engaged through workshops and review of policy wording / spatial mapping where relevant.
Mr. Mcmillan	DPS008	15	A call for ideas with landowners and developers should be undertaken. At page 13 of the document, it notes a list of who will be engaged in the process of developing the next LDP. Given this plan is not due to be adopted (per the timetable) until Q3 2029 and will last for a ten year period, there will be a need for suitable developable land to be allocated. There appears to be ample time to undertake a Call for Ideas following the Gatecheck too.
No name provided. Only email address provided.	DPS009	7	NPF3 is different in many aspects to NPF4, and Angus LDP 2016 was written in relation to NPF3, so I remain a little confused as to how planning till new LDP will work.
		8	Tbh, it takes some reading to understand. Not sure who gathers info for an evidence report
		12.1	For this stage, I found details on social media. Had I not been on this I would not have been aware, it says leaflets and newsletter, yet am unaware of any for general public.
		15	As above. For the general public, most will be unaware of these changes, until perhaps a development is proposed and they need to refer to the LDP.
		16	Leaflets to all homes, and notices on local community notice boards and in supermarkets.
		17.1	As I am unsure what each stage involves I cannot be fully sure, but would want to be made aware of how I could be involved

Angus Pylons Group	DPS010	8	Evidence report is not supposed to concentrate on specific areas, however the 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.
		15/15.1	Mainly digital and notification of events given via social media. Many elderly residents unable to know about events, or access online platforms
		16	Notices on village noticeboards, notices in local supermarkets, health centres, halls used for community gatherings
		17.1	In relation to why they would like to be updated (Q. 17.1) "Interest in moves to tackling renewable energy projects, and effects on rural communities, rural places within the county"
Mr. Strachan	DPS011	17.1	"Professional interest and relevance to land use"
Ms. Matthews	DPS012	6	I understood from the text and a general background knowledge of NPF4 how the system will be implemented. Not sure the diagram really helps. I think more information is needed on the Regional Spatial Strategy and Local Place Plans.
		7.2	Albeit the interpretation of aspects of NPF4 and how it relates to existing LDPs has still to be clarified by the court.
		8.2	The framework is clear although there does not appear to be any time set aside to modify the proposed plan following consultation. The process therefore assumes input from consultation will not be relevant. There is also a lack of information on where evidence is to be gathered from and the use of Local Place Plans in this process
		11.2	we would however question whether these timescales are realistic given the delays experienced in the past in the adoption of LDP 2009 & 2016.
		12.1	It is highly important that time is provided for sufficient consultation and further modification of LDP2. The delivery of LDP2 will be reliant on developers so Angus Council must ensure they engage with us at every stage. Engagement as early on as the evidence report would seem to be necessary.
		14.1	They are policy statements. It is difficult to see how they will work in practice.
		14.2	Generally developers appear to be excluded as a relevant stakeholder other than in the proposed plan stage. Also think further information is required on how the

			Council will ensure interested parties are made aware of updates as and when these happen.
		15.2	Although further information is needed to ensure all interested parties are kept updated via a mailing list.
		16	Developers are missed in terms of the list of groups.
		17.1	Local Developers should be engaged as early as possible as they are the best means of knowing what land is available in local areas, what the constraints are and if they can be overcome.
Mr. Stevenson / Historic Environment Scotland	DPS013	17.1	As a key agency we welcome the opportunity to be involved throughout the development of the plan. There is merit in being involved at every stage and we are happy to support the Council throughout this process. In terms of collaboration methods we are happy to attend meetings (on line or in person) or email exchange.
		25	We look forward to supporting the Council throughout the preparation of the new LDP and its SEA. We have issued a report to your Council which sets out some evidence relating to the historic environment in Angus and we hope this will be of use to in the preparation of a robust evidence base for the LDP.
No name provided. Only email address provided.	DPS014	7	It doesn't clearly help you understand the process or stages, it just lets you know that LDP and NPF4 are the main elements with peripheral LPP and RSS have an inclusion in to the final SDP. It doesn't make clear if the LDP relates to 2016.
		14/14.1	Could have used Plain English.
		17.1	To ensure that the community/public interests are included at all stages
DJ Laing	DPS015	5	The DPS should provide further information on Local Place Plans, their purpose, who prepares them, their status and how they link into the new LDP; particularly in relation to future land allocations.
		6	See previous response with regard to Local Place Plans - purpose, status etc. Clarification on timescale for regional spatial strategy and how this links into the new LDP would be helpful.
		Email response	Among the many changes is the opportunity to prepare Local Place Plans (LPP's). Information in the Development Plan Scheme on who prepares these, their purpose and how they support the Proposed LDP is extremely sketchy. The relevant

			paragraph in the DPS raises far more questions. Is it the Councils intention to publish more useful information / guidance to clarify the role and purpose of LPP's and in particular how they contribute (if at all) to creation of the Proposed Plan?
		14	There is no reference to the development industry (e.g. house builders); it would be helpful to know if you intend to undertake specific consultation with this group; if so, how?
		17.1	As a local Angus house builder it is important that we maintain a land supply and this can only be made effective by engagement in the new LDP preparation.
		21	The PS seeks to cast wide engagement however, specific groups eg development industry / house builders which will be a key player in delivering the Council's strategy and objectives are not specified at present. Consider this to be an omission.
		25	In addition to completing the online questionnaire we have responded to Angus Council by email (dated 7 November 2023) raising many of the points highlighted by our questionnaire response. We look forward to continuing dialogue.
		Email response	I note that a key new Local Plan process is the preparation of an Evidence Report (ER) and subsequent Gate Check stage. Among the many functions of the ER, it is required to produce "a site selection methodology for the allocation of new land for development of a range of purposes." Is it your intention to discuss this with the development industry in advance of publication of the draft ER or just deal with the matter as part of the formal consultation process associated the Evidence Report. I have noted that the DPS indicates that a draft Evidence Report will be published in the second quarter of 2024 with an eight-week consultation period thereafter.
		Email response	As you may be aware DJ Laing Homes Ltd have over many years maintained a good dialogue with the Angus planners and have previously discussed with development planning staff at update meetings our aspirations for the Company going forward in relation to our various land holdings and options around Carnoustie and other locations in Angus. We have discussed and submitted preliminary information (including some proposals) on these various sites. Given the significant staffing changes which have taken place pre and post COVID, the status of this various information is unknown in the context of this new Development Plan Scheme. It would be useful if you could clarify the status of this previous

			information, and whether it is your intention to further discuss the material with us as the new ALDP2 process moves forward?
		Email response	The lack of any pre-engagement with the house building/development industry means that the Council may not be aware of possible options and/or whether sites are effective and deliverable. It may also mean that the Council will be unable to test realistic options outwith the framework of a published Proposed Plan. I realise that this Local Development Plan will be brought forward under a new legislative framework but the fundamentals of land use practice remain and many of the future challenges will revolve around where and when new development comes forward to meet the needs of Angus residents etc.
No name provided. Only email address provided.	DPS016	17.1	To have a more active involvement in proposed housing in my area, and the impact of this and other factors which are contributing to flooding, traffic congestion, air pollution and loss of wildlife and habitat
Ms. Jenkins	DPS017	5	Our community are struggling with this and have asked for the opportunity to talk to someone about this. We'd really benefit from a presentation to make it tangible for our community.
		6	This is too abstract and it's unclear. The associated text does little to help it relate.
		7	I understand this bit well but I'm not sure others in the community do. I think it needs to be simpler again
		11	I thought this was clearer although it's vague. For example - you're gathering evidence but what specifically
		12/12.1	You have got to do some of this in the community, face to face. I represent planning in the community council and we are receiving a barrage of queries. Whilst I have a background in construction and building, it's not enough to respond to the detailed queries they are raising regarding housing provision, planning and key site planning."
		15/15.1	For our community they are struggling with the internet etc. We'd want to see as much F2F as possible" "Do F2F. Don't rely on technology or complicated mail shots. They don't respond well to this.

		17.1	I represent the Community Council as their Planning Community Councillor. A lot of the questions come my way. MBLCC are a council that are very keen to be involved
Gowanbank LLP	DPS018	17.1	We have land that is currently allocated for housing site within the local plan
No name provided. Only email address provided.	DPS019	16	"Community Action Groups e.g. Muirhead and Birkhill Community Action Group" –implying that Community Action Groups should be added to the list of consultees.
		17.1	Information regarding proposed use of green belt farmland for housing
		21	As a community we are extremely concerned at the onslaught of proposed large scale housing developments causing all sorts of problems including flooding and congestion in our villages
Ms. Leece / Ogilvie Homes	DPS020	12/12.1	Angus Council appear to be targeting adoption of the LDP by 2029, which appears excessive and leaves the development industry in limbo and outwith the timescales of the LDP Guidance of May 2028
		15/15.1	More detailed on who you intend engaging with and at what stage in the process
		16	Robust Call for Views and Call for Ideas stages are required
		17.1	We are keen to work with the Council and Homes for Scotland throughout the LDP process
		21	Early engagement on clear Call of Ideas / Call for Sites stages with a Site Assessment Methodology clearly outlined and discussed
		25	Per Homes for Scotland's response, significant industry engagement is required particularly to Housing Needs and Demand / Housing Land Requirement and this could underpin socio-economic issues going forward
Ms. Donnan	DPS021	16	Remember people who do not have access to computers etc.
Mr. Merry	DPS022	5,2	This public consultation runs for under a month and ends on 21st Nov 2023. Are there other opportunities for the public to engage with the ALDP at major stages of the development of the new ALDP?
		12.1	I would prefer that the public had further opportunities to engage and consult with the LDP as it went through the major stages

		17.1	To participate in the drafting of the LDP to provide local environmental knowledge on prospective land allocations for housing developments in my area.
Ms. Merry	DPS023	17.1	I would like to be consulted in regard to any housing developments in my area
Mr. Grubb	DPS024	17.1	Involved with local community council
Ms. McKay	DPS025	17.1	Would like to know about topics that may affect our community
Ms. Prain	DPS026	17.1	As a local living in Muirhead there are plans for a housing development not at planning stage yet which may affect our community
No name provided. Only email address provided.	DPS027	12.1	Will there be specific engagement with OAP's as many aspects are particular to this group?
		17	None of the above, I do not want to be involved in the Local Development Plan process
		17.2	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 would not have adequate free time to engage with the various stages.
No name provided. Only email address provided.	DPS028	11.1	I think it could be more concise
		17.1	To allow stakeholders to get a full understanding of the development plan process
Ms. Millar	DPS029	7	I can't remember reading this clearly
		17.1	I would like to be involved as I have a concern about a huge development in the village I live in. I would like to be part of the process, so that I can learn more about this process and be informed about the choices we have when it comes to the village
Ms. Gibson / Homes for Scotland	DPS030	12	We note that the DPS is targeting adoption by 2029, however we think that the Council can and should be more ambitious with these timescales. All LPAs are expected to have an adopted plan in place by 2028, as stated in the Scottish Government LDP Guidance: "It will be important for the first round of 'new style' LDPs to be prepared in a timely fashion. Every planning authority in Scotland should have a new style LDP in place within around 5 years of the Regulations coming into force i.e. by May 2028." (Para. 64) In order to allow for slippage in

			<p>the timelines the DPS should aim for the conclusion of the examination process and adoption by the end of 2027.</p>
		15.2	<p>More detail is required regarding how the engagement of key stakeholders will take place. In reference to the evidence-gathering stage, Local Planning Authorities (LPAs) are expected to undertake early and proactive engagement with stakeholders, including key agencies, to ensure collaboration and evidence-gathering. It would be beneficial for all parties if Homes for Scotland (HFS) and the wider home-building industry were involved at the earliest possible stage. During the Evidence Report stage, we would like to see more information on how the engagement of key stakeholders will take place, and who the Council considers would have a key role in the meeting of the legislative requirements of the Evidence Report. We would also like to see a reference to what other local authorities have termed "expert groups". These will be stakeholders with key expert knowledge in an industry. HFS can act as this stakeholder for the home building industry. It is positive that the Evidence Report Preparation stage of the Development Plan Scheme (DPS) sets out that the Council will seek views on the gathered evidence from key agencies and stakeholders. As noted above, HFS is ideally placed to represent the home building industry as a key stakeholder and would ask that we be engaged in both contributing information to the Evidence Report, and the review of this evidence base. The draft Participation Statement refers to engagement and consultation with landowners and developers and key agencies. As the organisation that represents most of the companies that provide new homes of all tenures across Scotland, Homes for Scotland wishes to be named as a key engagement partner.</p>
		16	<p>It is positive that the Proposed Plan Preparation stage of the DPS includes a Call for Views stage. It should be incumbent upon all Local Authorities to complete a robust Call for Ideas stage, to enable the most transparent approach to policy formation, and the selection of sites for development. Failing to carry out this stage risks limiting selection to those sites put forward by the LPA and may</p>

			preclude the most deliverable and sustainable sites. Establishing a deliverable housing land pipeline as part of the proposed plan is critical to ensure that the next Local Development Plan is able to deliver the range and quantum of new homes required. HFS is keen to build on the positive engagement work being undertaken as part of the annual housing land audit process to assist the council in allocating, and de-allocating where appropriate, future housing sites. HFS is keen to build on the positive engagement we've recently had with Angus Council through the housing land audit process. This should take the form of, ideally, in-person meetings between HFS and its members and the ability for two-way communication between us and the council in the form of phone calls and emails as appropriate.
		17.1	HFS is an organisation that represents circa 200 companies (operating across both the private and social sectors) that together provide the vast majority of all new homes of all tenures built across Scotland. Given the importance of home building across all tenures to the social and economic success of Angus, it is vital that a home builder representative is defined as such. HFS is keen to build on the positive engagement we've recently had with Angus Council through the housing land audit process. This should take the form of, ideally, in-person meetings between HFS and its members and the ability for two-way communication between us and the council in the form of phone calls and emails as appropriate.
		21	Establishing a coherent Site Assessment Methodology will require significant engagement with HFS and our members. Given the restricted capacity for non-allocated sites to come forward in the post-National Planning Framework 4 (NPF4) landscape, it is vital that every site that is allocated is delivered within the plan period. Failing to ensure a robust assessment methodology to measure these prospective sites against will inevitably weaken the Plan's capacity to deliver the number and range of new homes required.
		25	To adapt the Housing Need and Demand Assessment (HNDA) figure into a Local Housing Land Requirement (LHLR) figure will also require significant engagement with HFS and our membership. There must be open and transparent dialogue on setting the LHLR including which other factors should be considered in order that the LHLR exceeds the Minimum All-Tenure Housing Land Requirement (MATHLR)

			<p>as required by NPF4. The current Housing Need and Demand Assessment (HNDA) process and toolkit are fundamentally flawed and significantly underestimate the true need and demand for housing. This is primarily due to it taking a very limited view of what constitutes existing need and demand. Household projections are used to predict future demand; however, these are overly influenced by negative trends associated with the period following the global financial crisis. This use of past trends carries the risk of subsuming negative trends, such as the effects of under-provision of housing during periods of economic underperformance. A robust approach to the HNDA process must include undertaking primary research to identify actual household groups in need (e.g., families in over-crowded homes, young people still living with parents, and older people in homes that are unfit for their changing needs) and in-depth analysis of the existing housing stock in terms of its energy efficiency and quality. It should also undertake research on affordability pressures, ambitions for demographic change, and economic growth. The HNDA process as a base tool for determining minimum housing numbers needs to be more robust, transparent, and tested with a strong evidence base for housing needs being part of the evidence report stage. We support any primary research that a Local Authority may wish to undertake and would expect significant weight be given to any external primary research that is carried out. The socio-economic benefits of home building cannot be understated. Our members contribute millions of pounds annually to infrastructure investment across the district and their role as a principal funder of future investments must be fully recognised, as should their role in the journey towards net zero through the delivery of increasingly energy efficient homes, as well as local living neighbourhoods.</p>
Guild Homes	DPS031	Email response	<p>Page 5 the DPS refers to a Regional Spatial Strategy for the Dundee, Perth & Kinross and Angus areas. Can you provide more information on who prepares this document given it will involve three different local authorities. Will the document be published as a draft for consultation? Will there be any public involvement in the preparation of this strategic document?</p> <p>Again on page 5 there is reference to Local Place Plans as forming part of the evidence base for LDP2 – the DPS needs to provide further information on how these will be formed and how they will work in practice. For example there does</p>

			<p>not appear to be a definition for the 'community bodies' responsible for preparing these. There is also no mention of these Local Place Plans in the timescales outlined within the DPS which makes it difficult to see how they will fit within the overall process.</p>
			<p>Evidence gathering- the DPS references "evidence gathering" throughout without making it clear where the evidence will be coming from. Can you provide further information on how and from whom this evidence is being gathered and if there is an opportunity for developers to submit evidence i.e. Development Plan Bids?</p>
			<p>On page 9 the evidence report is referred to but it is unclear whether developers will be included in this process or have the ability to review the evidence report prior to it being put to the Gatecheck stage. Given the proposed plan will be heavily influenced by the evidence report it would seem sensible to encourage feedback from developers at the evidence report stage.</p>
			<p>On page 9 the Proposed Plan and Examination indicates that the Council can choose to ignore consultation responses and progress towards adoption of LDP2 without modification following receipt of valid representations received. Please confirm that, if the Council choose to disregard objections and do not modify the Plan, that the proposed LDP2 along with all consultation responses received will be submitted for examination.</p>
			<p>On pages 10 and 11 the Timetable is set out. We would seek the following further clarification on the proposed timetable:</p> <ul style="list-style-type: none"> Can you confirm who will be consulted on the Draft Evidence Report? Can you confirm where the Regional Spatial Strategy and Local Place Plans sit within this timetable? <p>The timetable only accounts for the scenario where no modifications are made to the proposed LDP2 prior to it being submitted for examination. It would appear there is only room for modification after examination. We consider this to be very concerning. LDP2 will be a 10 year plan and it is highly likely there will be a high level of consultation response submitted to it. If no modification is timetabled the council must be either assuming there will be a low level of representation, which is not realistic, or they are assuming the proposed plan will be submitted for examination without</p>

			<p>modification regardless of any responses received. Please confirm why there has been no time factored in for modification of LDP2?</p> <p>On page 13 under 'Who we will Engage With' developers do not appear to be referenced as a relevant stakeholder. Later in the table/section developers only appear to be referenced as stakeholders at the proposed plan stage i.e., Q2 2025-Q3 2029. It is imperative that local developers are involved at an early stage so that Angus Council can develop an understanding of the available land supply vs the land requirements within each area of Angus. The only way to know what land is effective/constrained and gauge overall developer interest is to engage with developers from the outset of the preparation of LDP2.</p> <p>On page 14 under 'How May We Engage' in terms of Engagement HQ we would ask if this can be linked to a mailing list so all interested parties are informed by email when there is an update posted? Also in terms of the LDP page on the councils website, can interested parties be informed when an update is posted?</p> <p>Finally on page 22 there does not appear to be any consultation period timetabled for the Delivery Programme.</p>
Ms. Mcdonald	DPS032	17.1	would like to be kept informed
		21	Email will suffice
Ms. Kidd	DPS033	6.2	Not all the rerms have been explained e.g. Regional Spatial Strategy. You need to explain what is covered by each plan
		8.1	The local place plans are not covered at all well. I am also confused on the timings listed. It feels like we should have seen some information before now if you are keeping to the schedule
		11.1	You seem to be very behind plan or have not communicated well with the public
		17.1	It is important for the local communities to be able to check that the council has all the community information correct and reflects what the community needs and wants are
No name provided.	DPS034	4.2	I think it is to inform how people can be involved.
		5.1	Think the changes include the need to involve communities etc but not sure.
		6	The diagram notes the components but does not really describe process ie what comes first etc ...

Only email address provided.		8.2	Language not plain English and acronyms used.
		11.2	I would say not easy to understand unless actively engaged or interested in the process.
		12.1	Explain technical terms eg Gatecheck ??
		14.2	Clear but not fully understood eg what is meant by sustainable in relation to community engagement?
		15.2	Not explicitly more overarching.
		16	Ask these groups how they wish to be engaged with?
		17.1	As an Angus resident.
Ms. Stuerck / Tactran	DPS035	Email Response	Tactran supports the approach adopted by Angus Council to engage with the public and stakeholders on the development of Angus's Local Development Plan.
		Email Response	<p>Tactran would like to see the important link between the LDP and the Regional Transport Strategy strengthened as the current document does not fully reflect this link:</p> <ul style="list-style-type: none"> • The Transport (Scotland) Act 2005 places a duty on constituent Councils, Health Boards and other public bodies to perform their functions which relate to, or which are affected by transport, consistently with their respective Regional Transport Strategy. Tactran, subsequently, would recommend strengthening this relation. • LDPs should be informed by an appropriate and effective transport appraisal undertaken in line with relevant transport appraisal guidance. Plans should be informed by evidence of the area's transport infrastructure capacity, and an appraisal of the spatial strategy on the transport network. This should identify any potential cumulative transport impacts and deliverable mitigation proposed to inform the plan's infrastructure first approach." NPF4 Policy 12

			Tactran can help with this, as proposed in the Scottish Government Local Development Planning Regulations & Guidance Consultation (NB final guidance due spring 2023)
		Email Response	<p>Tactran notes the Local Development Planning Regulations & Guidance recommendation in that LDPs should consider regional strategies in the preparation of evidence reports, and the specific identification of regional transport strategies. RTSs can assist the Evidence Report assessing existing and planned travel and transport infrastructure and services available in the plan area for movement of people and freight across all modes of transport draft guidance (p.107 refers)</p> <p>Tactran notes the Local Development Planning Regulations & Guidance recommendations that undertaking a transport appraisal for a LDP connections and efficiencies can be made with other plans and strategies, such as Regional and Local Transport Strategies (draft guidance p.158 refers)</p>
		Email Reponse	Tactran will, subsequently, continue to seek to work with the development planning function in Angus Council to ensure the policies of the Tayside and Central Scotland RTS and the policies of Angus' Local Development Plan align. This response is part of this process.
Ms. Dryburgh / Barratt and David Wilson Homes North Scotland	DPS036	9	There is no formal Call for Sites stage.
		9.1	Establishing a deliverable housing land pipeline as part of the proposed plan is critical to ensure that the next Local Development Plan is able to deliver the range and quantum of new homes required. Q2 2025-Q3 2027: Plan Preparation including engagement and associated assessments is too vague. There is no formal opportunity for developers to submit their proposals and site interests to the Council for consideration. As discussed in the HLA meeting, in relation to business plans, and operational efficiency, the preparation and submission of masterplans and development bids for sites – and their consideration by the Council at the relevant stage is an important step. Adequate lead-in times and timeframes should be incorporated in the DPS in order to allow for all parties to be aware of the expectations placed upon them. Externally, landowners and

			agents – quite rightly- expect to know the timescales and opportunities for engagement, to ensure that developers are fulfilling their obligations on sites that are under option.
		10	The Appendix A detail for the Q2 2025-Q3 2027: Plan Preparation period provides little additional detail - in that "Call for views" is a "method we may use". This is too vague and does not provide the clarity required in the comment above
		12	More detail is required on engagement with key stakeholders, who are responsible for the delivery of the new plan - inc. the development industry, HfS, SSEN and Scottish Power. Engagement with energy providers is critical to ensure network capacity is required, given the increased demands on the network due to carbon reduction policies, including removal of gas boilers from new development and introduction of EV charging within developments.
		12.1	Housebuilders and commercial developers: introduce formal Call for Sites stage and assess proposals received against an agreed Site Assessment Methodology, to allow for certainty and transparency in the allocation of development proposals. Ongoing and regular dialogue with housebuilders, to allow for early and two-way discussion and regular updates.
		18	Development of coherent Site Assessment Methodology will require significant engagement with housebuilders and commercial developers. As NPF4 removes the ability for local authorities to grant planning consent to unallocated greenfield sites, the allocation of development sites which can deliver the Local Housing Land Requirement in full, during the LDP period is crucial.
		21	To adapt the Housing Need and Demand Assessment (HNDA) figure into a Local Housing Land Requirement (LHLR) figure will also require significant engagement with HFS and the wider housebuilding industry. There must be open and transparent dialogue on setting the LHLR including which other factors should be considered in order that the LHLR exceeds the Minimum All-Tenure Housing Land Requirement (MATHLR) as required by NPF4. The current HNDA toolkit is flawed and significantly underestimates the true scale of housing need. We support any primary research that a Local Authority may wish to undertake and would

			expect significant weight be given to any external primary research that is carried out.
Mr. Maclean	DPS037	12.1	<p>We note that the DPS is targeting adoption by 2029, however we consider that the Council can and should be more ambitious with these timescales. As stated in the Scottish Government LDP Guidance, all Local Planning Authorities (LPAs) are expected to have an adopted plan in place by 2028,:</p> <p><i>"It will be important for the first round of 'new style' LDPs to be prepared in a timely fashion. Every planning authority in Scotland should have a new style LDP in place within around 5 years of the Regulations coming into force i.e. by May 2028."</i> (Para. 64)</p> <p>In order to allow for slippage in the timelines the DPS should aim for the conclusion of the examination process and adoption by the end of 2027.</p>
		15	<p>More detail is required regarding how the engagement of key stakeholders will take place. In reference to the evidence-gathering stage, LPAs are expected to undertake early and proactive engagement with stakeholders, including key agencies, to ensure collaboration and evidence-gathering. It would be beneficial for all parties if Homes for Scotland (HFS) and the wider home-building industry were involved at the earliest possible stage.</p> <p>During the Evidence Report stage, we would like to see more information on how the engagement of key stakeholders will take place, and who the Council considers would have a key role in the</p>
			<p>It is positive that the Evidence Report Preparation stage of the Development Plan Scheme (DPS) sets out that the Council will seek views on the gathered evidence from key agencies and stakeholders. As noted above, HFS is ideally placed to represent the home building industry as a key stakeholder and we would suggest that they be engaged in both contributing information to the Evidence Report, and the review of this evidence base.</p> <p>The draft Participation Statement refers to engagement and consultation with landowners and</p>

			<p>meeting of the legislative requirements of the Evidence Report. We would also like to see a reference to what other local authorities have termed "expert groups". These will be stakeholders with key expert knowledge in an industry. HFS, with support from its member companies, can act as this stakeholder for the home building industry.</p>	<p>developers and key agencies. As the organisation that represents most of the companies that provide new homes of all tenures across Scotland, Homes for Scotland should therefore be named as a key engagement partner.</p>
		16	<p>It is positive that the Proposed Plan Preparation stage of the DPS includes a Call for Views stage. It should be incumbent upon all Local Authorities to complete a robust Call for Ideas stage, to enable the most transparent approach to policy formation, and the selection of sites for development. Failing to carry out this stage risks limiting selection to those sites put forward by the LPA and may preclude the most deliverable and sustainable sites.</p>	
		16	<p>Establishing a deliverable housing land pipeline as part of the proposed plan is critical to ensure that the next LDP is able to deliver the range and quantum of new homes required. HFS and their member companies, including Kirkwood Homes, can help build on the positive engagement work being undertaken as part of the annual housing land audit process to assist the Council in allocating, and de-allocating where appropriate, future housing sites.</p> <p>HFS and their member companies, including Kirkwood Homes, remain keen to build on the recent positive engagement with Angus Council through the housing land audit process. This should take the form of, ideally, in-person annual meetings between HFS and its members and the ability for two-way communication with the Council in the form of phone calls and emails as appropriate.</p>	

		17.1	<p>Kirkwood Homes have various current and emerging land interests across Angus and the Tayside area in general. Working with HFS, an organisation that represents circa 200 companies, operating across both the private and social sectors, they remain keen to engage and assist in delivering all tenures of housebuilding across Scotland. Given the importance of home building across all tenures to the social and economic success of Angus, it is vital that home builder representatives are defined as such.</p> <p>As above, HFS and their member companies, including Kirkwood Homes, remain keen to build on the recent positive engagement with Angus Council through the housing land audit process. This should take the form of, ideally, in-person annual meetings between HFS and its members and the ability for two-way communication with the Council in the form of phone calls and emails as appropriate.</p>
		21	<p>Establishing a coherent Site Assessment Methodology will require significant engagement with HFS and member companies. Given the restricted capacity for non-allocated sites to come forward in the post-National Planning Framework 4 (NPF4) landscape, it is vital that every site that is allocated is delivered within the plan period.</p> <p>Failing to ensure a robust assessment methodology to measure prospective sites against will inevitably weaken the Plan's capacity to deliver the number and range of new homes required.</p>
		24	<p>Monthly newsletters. Aberdeenshire Council are a very good example of timeous LDP preparation updates.</p>
		25	<p>To adapt the Housing Need and Demand Assessment (HNDA) figure into a Local Housing Land Requirement (LHLR) figure will also require significant engagement with HFS member companies. There must be open and transparent dialogue on setting the LHLR including which other factors should be considered in order that the LHLR "exceeds" the Minimum All-Tenure Housing Land Requirement (MATHLR) as required by NPF4.</p>

			<p>The current Housing Need and Demand Assessment (HNDA) process and toolkit are fundamentally flawed and significantly underestimate the true need and demand for housing. This is primarily due to it taking a very limited view of what constitutes existing need and demand. Household projections are used to predict future demand; however, these are overly influenced by negative trends associated with the period following the global financial crisis. This use of past trends carries the risk of subsuming negative trends, such as the effects of under-provision of housing during periods of economic underperformance.</p> <p>A robust approach to the HNDA process must include undertaking primary research to identify actual household groups in need (e.g., families in overcrowded homes, young people still living with parents, and older people in homes that are unfit for their changing needs) and in-depth analysis of the existing housing stock in terms of its energy efficiency and quality. It should also undertake research on affordability pressures, ambitions for demographic change, and economic growth. The HNDA process as a base tool for determining minimum housing numbers needs to be more robust, transparent, and tested with a strong evidence base for housing needs being part of the evidence report stage. Kirkwood support any primary research that a Local Authority may wish to undertake and would expect significant weight be given to any external primary research that is carried out.</p> <p>The socio-economic benefits of home building cannot be understated. HFS member companies contribute millions of pounds annually to infrastructure investment across Angus and their role as a principal funder of future investments must be fully recognised, as should their role in the journey towards net zero through the delivery of increasingly energy efficient homes, as well as local living neighbourhoods.</p>
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Henry Young (Cairn Timber) Limited	DPS038	8.1	What is expected from my organisation and when?
		14.1	Plain English would be helpful
		15.1	Prefer direct contact when appropriate by email or letter

The following table provides the questions asked on the draft Development Plan Scheme and Participation Statement 2023 and to find out how a wide range of stakeholders, organisations, Community Council's and members of the public wished to be involved in the preparation of the next LDP for Angus.

Question no.	Question
1.	Are you representing on behalf of an individual or organisation?
1.1	If you are responding on behalf of an organisation, please state the name below
2.	Please provide your contact details*
3.	Development Plan Scheme Questions (Heading)
4.	Do you understand the purpose of the Development Plan Scheme and Participation Statement?
4.1	If no, can you provide further details on your reasons for saying no below?
4.2	Any other comments?
5.	Are the main changes to Scotland's Development Planning System and how these impact on the preparation of the next Local Development Plan for Angus clear and understandable to you?
5.1	If no, can you provide further details on your reasons for saying no below?
5.2	Any other comments?
6.	The Development Plan Scheme provides a diagram on page 6 to aid with the understanding of the main changes to Development Planning in Scotland. Is this clear and does it help you to understand the process and stages of Development Planning?
6.1	If no, can you provide further details on your reasons for saying no below?
6.2	Any other comments?
7.	The Development Plan Scheme provides information on how National Planning Framework 4 and the current Angus Local Development Plan (2016) will be used to assess planning applications until the new Local Development Plan is adopted.
7.1	If no, can you provide further details on your reasons for saying no below?
7.2	Any other comments?
8.	The stages of the new Local Development Plan for Angus are contained within pages 10 and 11 of the Development Plan Scheme. Does this provide clear and understandable information on each step of the plan process and how it will be prepared?

8.1	If no, can you provide further details on your reasons for saying no below?
8.2	Any other comments?
9.	Would you like to be added to the Development Planning mailing list to be kept up-to-date and informed of the various stages of the Local Development Plan process and engagement and consultation events we will hold throughout the process?
9.1	If yes, can you please provide your contact details below*
10.	Timetable for the Local Development Plan (Heading)
11.	Is the summarised version of the timetable (page 12) easy to understand and does this diagram provide sufficient information regarding Angus Council's projected timescales for the next Local Development Plan?
11.1	If no, can you provide further details on your reasons for saying no below?
11.2	Any other comments?
12.	Do you have any further comments on the detailed timetable contained within the Development Plan Scheme and Participation Statement (Appendix A, pages 16-18) regarding the projected timescales?
12.1	If yes, please detail what further comments you have on the timetable for the Local Development Plan. please provide these below?
13.	Participation Statement Questions (Heading)
14.	Are these overarching principles clear and understandable?
14.1	If no, can you provide further details on your reasons for saying no below?
14.2	Any other comments?
15.	We are seeking your views on whether these proposed engagement methods are suitable and appropriate?
15.1	If no, can you provide further details on your reasons for saying no below?
15.2	Any other comments or suggestions?
16.	Do you have any other suggestions on how we should engage with these groups of people? If so, please provide these below:
17	Can you tell us what stages in the Local Development Plan Process that you would like to be involved in? (Please select all that apply)
17.1	Can you please tell us how and why you would like to be involved in this stage(s) of the Local Development Plan process?
17.2	If you select none, could you please tell us why you have selected this option?
18.	How often would you like to be involved in/express your views on the preparation of the Local Development Plan?
18.1	If you selected none of the above, can you please tell us why you have selected this option?

19.	What area(s) are you interested in and would like involvement and updates on? (Please select all that apply):
19.1	If you selected none of the above, can you please tell us why you have selected this option?
20.	What areas in Angus are you interested in and would like involvement and updates on throughout the preparation of the Local Development Plan? (Please select all that apply)
21.	If you have any other views regarding the content of the Participation Statement and/or how you would like to be engaged with, we would be grateful if you could detail your views and comments below:
22.	Key Agencies, Stakeholders, and Developers (Heading)
23.	What method(s) would you like the Council to use to engage and collaborate with you regarding the preparation of the Local Development Plan? (Please select all that apply)
24.	How regularly would you like to be engaged/consulted on the new Local Development Plan?
25.	If you have any other comments as a Key Agency, please provide them below:

*Relevant GDPR statement was also provided in line with each question asking for personal details