

Appendix 1: Summary of Comments Received During the Public Consultation on the Draft Participation Statement and Officer Responses

Respondee Number	Respondee
1	Savills (UK) Limited
2	Member of the public
3	Scottish Water
4	NatureScot
5	Member of the public
6	Member of the public
7	Member of the public
8	Rosemount and Mile End Community Council
9	Mactaggart and Mickel
10	Historic Environment Scotland
11	Member of the public
12	Homes for Scotland
13	Member of the public
14	Cults, Bielside and Milltimber Community Council

Question 1. Under the Consultation Partners section, are you satisfied with the non-exhaustive list of bodies and groups included?

10 respondents answered this question. 6 respondents (respondents 3, 4, 5, 6, 8 and 10) stated that they were satisfied with the list of bodies and groups included. 4 respondents (respondents 1, 9, 12 and 13) suggested other parties that they felt should be included or provided additional detailed comments - see summary table below.

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
1	Respondent wants to be on the list of businesses consulted.	<p>It is not necessary to include every organisation within the Participation Statement as the list of consultation partners is not intended to be exhaustive. It includes statutory partners only. Including specific private sector organisations within the Participation Statement may lead to confusion from other private sector organisations as to why they have not also been added. However, it is agreed that that status of the list of consultation partners could be clarified by adding a statement to confirm that it is non-exhaustive.</p> <p>Private individuals and organisations can subscribe by</p>	<p>Add text to the end of the final sentence in the Consultation Partners section to read: <i>"...however, this is not an exhaustive list and other key stakeholders will also be contacted."</i></p>

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
		<p>request to our newsletter in order to keep up to date with the 2028 Local Development Plan process. Subscribers will be contacted prior to all public consultation exercises that relate to the 2028 Local Development Plan.</p>	
9, 12	<p>The Draft Participation Statement refers to engagement and consultation with landowners and developers. As the organisation that represents most of the companies that provide new homes of all tenures across Scotland, Homes for Scotland should be named as a key engagement partner.</p>	<p>As outlined above, the list of consultation partners is not intended to be exhaustive and additional text will be added to the final version of the Participation Statement to clarify this.</p> <p>Private individuals and organisations can subscribe by request to our newsletter in order to keep up to date with the 2028 Local Development Plan process. Subscribers will be contacted prior to all public consultation exercises that relate to the 2028 Local Development Plan. It is understood that Homes for Scotland have already subscribed to the Local Development Plan newsletter and will therefore be informed of all consultation stages.</p>	<p>As proposed above, additional text will be included at the end of the final sentence in the Consultation Partners section to read: <i>"...however, this is not an exhaustive list and other key stakeholders will also be contacted."</i></p>

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
13	List is vague in most parts with no clear idea how ACC is planning with to engage: "Other Community Groups, Children and young people, Disabled persons, Elderly persons, Gypsy/Travellers, Minority groups". These are a list of demographics, not partners.	As outlined above, the list of consultation partners is not intended to be exhaustive. It includes statutory bodies and groups only. The specifics of how engagement will be undertaken is not covered in this section – rather it is expanded upon in table 4 under the Consultation Engagement section. Community Groups, Children and young people, Disabled persons, Elderly persons, Gypsy/Travellers, Minority groups are not listed as partners, they are the specific groups which legislation requires us to consult with. For each group listed there may be many separate representative organisations seeking engagement, and some who are not interested in engagement. It is not practical to list each and every organisation in this section at this stage of the process as it would likely cause confusion and lead to a lack of clarity in this section of the document.	No revision proposed.

Question 2. Are you satisfied with the proposed use of the National Standards for Community Engagement?

9 respondents answered this question. 7 respondents (respondents 1, 3, 4, 5, 6, 8 and 10) stated that they were satisfied with the proposed use of the National Standards for Community Engagement. Of these, 1 respondent (respondent 8) went on to provide more detailed comments (see summary table below). 2 respondents (respondents 11 and 12) stated that they were not satisfied and provided additional detailed comments to explain why (see summary table below).

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
8	Some key method actions should include direct contact with landowners and developers with stakes within local area. Evidence Report Preparation stage should seek views on the gathered evidence from key parties and stakeholders such as Homes for Scotland who have expert knowledge within home building industry.	Comments are noted. The Evidence Report will seek the views of key parties and stakeholders, including landowners and developers. Homes for Scotland will have the opportunity to be involved throughout the process. Further details are included within table 4 found under the Consultation Engagement section.	No revision proposed.
11	Only heard about this on Facebook on 24/9/2023 hadn't seen it advertised or mentioned anywhere else .	One of the ways the Council shared information about the consultation was via social media platforms such as Facebook, but a range of other methods were also used to publicise the consultation. For example, the consultation was publicised through the Local Development	No revision proposed.

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
		Plan Newsletter and on the Council's website. Key groups and stakeholders such as Community Councils were also notified of the consultation, and other specific interest groups were also contacted via email.	
12	<p>More detail required regarding how engagement of key stakeholders will take place. For 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. HFS and home-building industry should be involved at earliest stage.</p> <p>HFS represents circa 200 companies (private and social sectors) that provide the vast majority of all new homes of all tenures built across Scotland, and, given importance of home building to the social and economic success of the Council, it is vital that a home builder representative is defined as such.</p>	<p>More detail upon how key stakeholders will be engaged with can be found within table 4 found under the Consultation Engagement section. Some of the finer detail upon how consultation will take place will be decided for each stage closer to the time. It is not practical to have every detail set out within this Participation Statement as it is more desirable to have some degree of flexibility on this matter to benefit all parties . Further information on how engagement of key stakeholders could take place can be found on the Scottish Community Development Centre Website. The Council agrees with comments that early and proactive engagement with</p>	<p>Addition of a link to the Scottish Community Development Centre website has been added for greater clarity.</p>

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
		stakeholders is desirable with respect to the Evidence Report, and it should be noted that there will be opportunities for Homes for Scotland to be closely involved.	

Question 3. Do you have any comments upon the Advertisement and Awareness of Consultations section?

10 respondents answered this question. 5 respondents (respondents 3, 4, 5, 10 and 12) stated that they did not have any comments on the advertisement and awareness section. 5 respondents (respondents 1, 6, 7, 9 and 13) provided specific comments (see summary table below).

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
1	Council should also use its social media channels to publicise consultations on the future LDP.	The Council currently uses Facebook and X (formerly known as Twitter) to publicise consultations and will continue to do so for the future LDP. This is set out within the Advertisement and Awareness of Consultations section.	No revision proposed.
6	Advertise about each step frequently on social media. Ensure all Community Councils post about it on their social	As set out within the Advertisement and Awareness of	The Advertisement

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
	<p>media. Ensure all environmental and wildlife/biodiversity groups in the area are notified.</p>	<p>Consultations section the Council will advertise consultation events on Facebook and X (formerly known as Twitter). This will happen prior to and during the events. Community Councils will be made aware of consultation events via email and encouraged to share details of the consultation through their own networks. All statutory environmental organisations will be notified of consultation events, as will any others who sign up to the LDP Newsletter.</p>	<p>and Awareness of Consultations section will be updated to include reference that consultation events will be advertised on Facebook and X (formerly known as Twitter) throughout the events.</p>
7	<p>Ensure Council and Community Councils advertise across all forms of media. Local press, local community spaces and social media. Areas affected must have easy open access to plans being proposed. It should also be advertised in the local media, eg P & J and Evening Express. Facebook and Twitter (now X) not a reliable source of information.</p>	<p>As set out within the Advertisement and Awareness of Consultations section the Council will advertise consultation events on Facebook and X (formerly known as Twitter). Community Councils will be made aware of consultation events via email and encouraged to share details of the consultation through their own networks. Statutory Neighbour Notification of sites (within 20 meters) is referenced in the</p>	<p>The Advertisement and Awareness of Consultations section will be updated to include reference that consultation events will be advertised on Facebook and X (formerly known</p>

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
		document, as are our intentions in terms of advertisement within the local press. The list of advertisement methods is not exhaustive, the Council can choose additional methods throughout the 2028 Local Development Plan process should it see fit to do so.	as Twitter) throughout the events. It will also be updated to clarify that the list of advertisement methods are not intended to be exhaustive.
9	Some effective additional methods could include regular meetings and drop in sessions for all key stakeholders including land owners and developers further to statutory notification to strengthen communication between stakeholders and allow engagement opportunity for all.	Comments noted. Additional methods will be employed throughout the process and these may include those set out by the respondent.	No revision proposed.
13	Do not understand why a subscription to a newsletter cannot be automated on ACC website and request an additional barrier to contact by email to be added to a list. Centralised mailing list sought where individuals can manage which mailing lists they wish to receive.	At present it is straightforward to subscribe to the planning newsletter and subscribers are included as contacts in any consultation. There are implications with respect to General Data Protection Regulations in terms of rolling forward subscriptions between plan periods.	No revision proposed.

Question 4. Do you have any comments upon the Consultation Engagement section?

10 respondents answered this question. 4 respondents (respondents 1, 3, 5 and 8) stated that they did not have any comments on the consultation engagement section. 6 respondents (respondents 4, 7, 9, 10, 12 and 13) provided specific comments (see summary table below).

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
4	<p>Welcomes engagement with key agencies and is committed to working with Council to support LDP preparation and ensure that it contributes to demands and priorities such as planning for nature networks and delivering Positive Effects for Biodiversity.</p> <p>Early informal discussions sought and discussions throughout plan process. Given workloads across Scotland it would be helpful to consider evidence requirements as early. Some datasets may require our assistance for interpretation or to make best use of them, early identification of need will help us to plan resources.</p> <p>Suggests a range of consultation engagement methods will be required depending on nature of work and role in it. Hybrid approach sought using virtual or in-person meetings and workshops depending on the nature of the work.</p>	<p>Comments noted. The feedback will be considered when deciding the specifics of how consultation events will be managed for each stage of the 2028 Local Development Plan process.</p>	<p>No revision proposed.</p>
7	<p>Consultation must be in person to allow as many people as possible to have a say.</p>	<p>Comments noted. The feedback will be considered when deciding the specifics of how consultation events will be managed for each</p>	<p>No revision proposed.</p>

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
		stage of the 2028 Local Development Plan process.	
9	<p>Meetings and discussions with landowners and developers to keep them informed with the LDP process should be undertaken. This would improve stakeholder understanding and opportunity to discuss key topics. Inclusion of Call for Sites facilitates the most transparent approach to inform policy and the selection of the most suitable and sustainable sites for development. Comprehensive submission for Call for Sites will ensure the most effective and deliverable sites are selected.</p>	<p>Comments noted. The feedback will be considered when deciding the specifics of how consultation events will be managed for each stage of the 2028 Local Development Plan process. Comments with regards the Call for Sites stage are also noted.</p>	<p>No revision proposed.</p>
10	<p>Welcomes the commitment to engage with Key Agencies in the gathering of Evidence. Willing to offer input on proposed emerging topic papers, particularly the Historic Environment paper. For Strategic Environmental Assessment, interested to offer support.</p>	<p>Comments noted. Appropriate key agencies will be considered for relevant topic groups.</p>	<p>No revision proposed.</p>
12	<p>During the Evidence Report stage, respondent seeks more information on how engagement of key stakeholders will take place and who the Council considers would have a key role in meeting the legislative requirements. Wants to see a reference to what other local authorities have termed "expert groups". These will be stakeholders with knowledge. Homes for Scotland (HFS) can act as this stakeholder for the home building industry.</p> <p>HFS is keen to build on the previous engagement with Aberdeen City Council, taking the form of in person-</p>	<p>We can confirm that further information with regards to how the engagement will take place and who will be involved in the review groups will be made available during the Evidence Report stage. Comments are otherwise noted and appreciated. The feedback will be considered when deciding the specifics of how consultation events will be managed for each stage of the 2028 Local</p>	<p>No revision proposed.</p>

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
	meetings between HFS and its members and the ability for two way communication between the respondent and the Council in the form of phone calls and emails as appropriate.	Development Plan process. Interest in participating in the Review Groups is noted for future.	
13	Needs to be better communication about consultations. Simply putting on the hub is not sufficient and requires more media coverage including social and emailing (allowing individuals to sign up for a regular update on the hub or centralised mailing list). Documentation that needs to be reviewed has to be visible and not at the bottom of the page in small text and it needs to open in a new tab or window.	Comments noted. The feedback will be considered when deciding the specifics of how consultation events will be managed for each stage of the 2028 Local Development Plan process.	No revision proposed.

Question 5. Overall, is the Participation Scheme clear?

10 respondents answered this question. 8 respondents (respondents 1, 3, 4, 5, 6, 8, 9 and 10) said that they felt the Participation Scheme is clear overall. 2 respondents (respondents 12 and 13) stated that they did not think the Participation Statement is clear overall. Respondent 12 provided further detail as to why they felt it was unclear (see summary table below).

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
12	No reference as to how Council intends to prepare a site appraisal methodology. This is critical in ensuring a robust and deliverable local housing land requirement pipeline and requires significant engagement with HFS and members. Given restricted capacity for non-allocated sites to come forward post-National Planning Framework 4, 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.	Details of Site Assessment Methodology are not a matter to be set out in detail within the Participation Statement, the comments are however noted and will be considered at the relevant time in plan preparation.	No revision proposed.

Question 6. Are there any comments to make upon the rest of the Development Plan Scheme?

9 respondents (respondents 4, 5, 6, 7, 8, 9, 10, 11 and 12) made comments on the rest of the Development Plan Scheme (see summary table below).

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
4	<p>Table 3 is useful to get an overview of the themes across the policy documents and crossover/relationship between topics. Welcomes the policy areas included in Topic 7 Nature & Biodiversity. Respondents thinks it would be beneficial to include Topic 8 in the 'Related Topic Groups' for Topic 7 and vice versa.</p> <p>Notes that there will be review groups for each of the 9 topics and keen to participate in and support the relevant groups including for Topic 6, 7, 8 and 4 (blue green infrastructure).</p>	<p>Comments noted.</p> <p>Interest in participating in the Review Groups for topic groups 4, 6, 7, 8 is noted for future.</p>	<p>We will include the proposed change with respect to Related Topic Groups 7 and 8.</p>
5	<p>Ensure car travel access is continued. Not everyone has time within their busy week to travel by bike. Cars are a necessity.</p>	<p>This comment is not relevant to the Development Plan Scheme.</p>	<p>No revision proposed.</p>
6	<p>Priority: Protect all Green Belt land now and into future. Ensure all Green Belt land is protected from all developments, now and into future.</p>	<p>This comment is not relevant to the Development Plan Scheme.</p>	<p>No revision proposed.</p>
7	<p>Protect green belt areas now and in future. Utilise brownfield sites first. No altering of green belt boundaries to suit developers.</p>	<p>These comments are not relevant to the Development Plan Scheme.</p>	<p>No revision proposed.</p>

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
8	Document says that the Process to start the scheme is not yet available from the Scottish Government. Dates will have to be updated.	There is the potential that dates within the timeline will change through the process, in part this may be due to delays outside of the Council's control.	No revision proposed.
9	Timing of engagement is important as this allows Council to facilitate early engagement during the evidence gathering. Although Evidence Report will not consider specific sites, the housing crisis and promotion of NPF4 policies and spatial principles are important. Evidence based primary research should be conducted and engagement activities should outline primary research findings regarding housing and infrastructure to ensure robust evidence supports the evidence report. Respondent supports the inclusion of 'Call for Ideas' as part of the preparation of the proposed Local Development Plan.	Comments noted.	No revision proposed.
10	Welcomes inclusion of a Topic Paper on the Historic Environment to support the Evidence Report and looks forward to offering support.	Comments noted. Interest in participating in Review Group 3 is noted for future.	No revision proposed.
11	Do not think this plan should go ahead in such a populated area , these batteries are known to suddenly explode and if lots are stored together they are a risk .	The respondent has not provided any detail to clarify what plan this comment relates to. It is assumed that it relates to an individual planning application. It is therefore not directly relevant to the Development Plan Scheme.	No revision proposed.

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
12	<p>Notes DPS targeting adoption by March 2028 but seeks more ambitious timescales. All local authorities are expected to have an adopted plan in place by 2028. In order to allow for slippage in the timelines the DPS should aim for the conclusion of the examination process and adoption by end of 2027.</p> <p>Inclusion of Call for Ideas stage positive. 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> <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 and members. Open and transparent dialogue sought 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>Current Housing Need and Demand Assessment (HNDA) process and toolkit are flawed and significantly underestimate 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</p>	<p>The Council is not minded to change the timeline set out in the Development Plan Scheme at this time. The Development Plan Scheme is updated on an annual basis, and the timeline may be altered in future Development Plan Schemes depending on circumstances.</p> <p>Comments in relation to the robustness of the methodology of how Housing Need and Demand Assessment are conducted are not relevant to the Development Plan Scheme. Consultation on matters relating to the Delivery of Homes (topic group 3) in the Evidence Report will take place and Homes for Scotland's interest in participation in topic group 2 in particular is noted for future.</p>	No revision proposed.

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
	<p>projections are used to predict future demand; however, these are overly influenced by negative trends associated with the period following the global financial crisis. Use of past trends carries risk of subsuming negative trends, such as the effects of under-provision of housing during periods of economic underperformance. A robust approach to 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. 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. Respondent supports Council's primary research and expects significant weight be given to any external primary research carried out.</p> <p>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 recognised, as should their role in the journey towards net zero through the delivery of increasingly</p>		

Respondee	Consultation Response Summary	Officer Response	Action as a Result of Representation
	energy efficient homes as well as local living neighbourhoods.		

Other Comments - Received independently of the online survey by Respondee 14

Consultation Response Summary	Officer Response	Action as a Result of Representation
Appreciates Evidence Report process is under consideration by Scottish Ministers. Process includes a formal consultation period of 6 weeks for public comment on the 9 topic papers, indicatively in Oct-Dec 2024, but there is also period of engagement with communities in late-2023. Seeks clarity on scope and timing of this.	We will be in touch with all Community Councils with regards opportunities for early engagement upon the Evidence Report later in the year. More detail will be determined at this time.	No revision proposed.
Respondent wants to know what happens if Gate Check reveals issues requiring the Evidence Report to be revisited – given that the Call for Ideas is required to support the outcomes of the Evidence Report?	In such instances where the Council receives an Assessment Report requiring revisions to the Evidence Report, the Council will make the revisions as necessary within a reasonable timescale and resubmit to Scottish Ministers. This will not affect the Call for Ideas stage of the process. It will not be within the Council's gift to ensure that consultees align their ideas with the outcomes of the Evidence	No revision proposed.

Consultation Response Summary	Officer Response	Action as a Result of Representation
	Report regardless of any delay to the Evidence Report.	
Call For Ideas: “The public would be invited to submit ideas for any aspect of the plan such as proposed policies or development sites.” Respondent queries if public has freedom to propose new policies or modify existing ones?	Yes it is for the public to decide the contents of their input and the Council will consider these responses and give reasons as to why they will be or will not be carried forward for inclusion in the Local Development Plan.	No revision proposed.
Seeks clarification on respective scopes of the Evidence Report and Call for Ideas consultation to assist members of public in framing their comments appropriately at each stage.	Comments noted for these respective consultations.	No revision proposed.
Call for Ideas process needs to be sequenced so that the public (including Community Councils) has opportunity to review and comment on developers’ proposals (as was available in the previous process at the Main Issues stage).	Comments noted.	No revision proposed.
Consultation period also includes “modifications”. Bar in the chart and the text description should be split between them so that the public can understand when they are likely to be called on in consultation.	Officers are of the opinion that the diagram is clear enough in its present form.	No revision proposed.
Local Place Plans: During the early consultation on the Evidence Report (July-December 2023) “There will be meetings with Community Council groups with a particular focus on the inclusion of elements from prepared local place plans”. Also “For Local Place Plans to be considered in the preparation of the proposed Local Development Plan, it is necessary for communities to submit them to the planning authority by the 31st of December 2024.” Seeks clarification as to whether this means CC’s must give notice of possible Local Place Plans by 31 st December 2023 and full	Formal notice of LPPs prior to 31 st December 2023 is not necessary. LPPs need to be submitted prior to 31 st December 2024 in order to be included within the final version of the Evidence Report. LPPs submitted after this date are still a material consideration in the planning process and will be taken	No revision proposed.

Consultation Response Summary	Officer Response	Action as a Result of Representation
<p>submission by 31st December 2024, or can LPP initiated after end-2023 still be considered for inclusion in LDP?</p>	<p>into account in the preparation of the 2028 Local Development Plan if they are submitted during its preparation, provided there remains reasonable time for the Council to action their inclusion.</p>	
<p>Advertisement and awareness of consultations: respondent welcomes use of social media and will use own Facebook page and quarterly community magazine. Recommends use of prominent display advertising in the local press news pages and not buried with “public notices”.</p>	<p>Comments noted. The Council has statutory requirements for press advertisements. These are placed within the public notices section.</p>	<p>No revision proposed.</p>