

Summary of comments to pre-consultation draft SG

1.	Compliance with national guidance
1.1	Items for which contributions will be sought and when must be set out in the SDP / LDP in order to be subject to examination.
1.2	The SG fails the tests for developer contributions. Circular 1/2010 para. 17 makes it clear that payments cannot be extracted when not directly related to the proposed development. Must also be limited to providing necessary facilities required as a consequence or in connection with the development.
1.3	It is not the responsibility of developers to resolve existing issues, but to address impacts from their development.
2.	Conformity with the structure plan
2.1	There is no indication in the SP that a levy will be applied to all developments in the SGAs.
2.2	The SP envisages that some public sector contribution will be available to fund the infrastructure improvements arising from new development.
2.3	The SP promotes sustainable mixed communities, but these have high infrastructure costs and STF will impact on viability and undermine the creation of these communities.
3.	Conformity with the local development plans
3.1	The SG must await the outcome of the examination into the LDPs, particularly requirements for strategic transportation within Aberdeen City.
3.2	There should be no requirement for contributions from allocations within the adopted local plans; these were to conform with NEST.
3.3	There is a mis-match between the SG interventions and those in the Shire LDP.
4.	CTA
4.1	The costs for interventions should not just fall on landowners and developers.
4.2	The schemes listed are needed to remedy existing deficiencies.
4.3	Impact should be considered at the time the relevant development proceeds.
4.4	Must consider sustainable communities which will reduce the need to travel.
4.5	In some areas the CTA shows a reduction in traffic post AWPR even with all LDP allocations; this does not support the need for the STF.
4.6	The Elsick Fastlink should remain as a strategic intervention.
5.	Specific SG comments
5.1	More work must be done on the list of projects to assess their design and cost, too early to set contributions without this information.
5.2	Concerned the 'assumed costs' could rise substantially.
5.3	The STF should not be used to pay for appraisal and design aspects, these are revenues costs the councils should fund.
5.4	The 20 year time frame is too long and negates that argument that these are essential projects.
5.5	The imposition of a roof tax in this economic climate could affect the viability of some developments when lending is so difficult to secure.
5.6	The mechanism pays no attention to sites that have significant upfront or abnormal costs.
5.7	Sustainable mixed communities should not be penalised for providing employment uses; there needs to be some flexibility.
5.8	Need to be able to offset contributions for brownfield sites where traffic is already generated and require no contributions where there is a net decrease.

- 5.9 Concern about the proposed amounts for employment land, these are too high.
- 5.10 Contributions for housing may also affect viability of some sites.
- 5.11 Contributions for residential should be standard, proposal is complicated and will be tedious if sites are amended.
- 5.12 There should be no contribution from affordable housing.
- 5.13 The proposed mechanism disadvantages higher density urban development, a per acre rather than per unit price may be more equitable.
- 5.14 Concerned about the differences between land values in Aberdeen and more outlying areas (particularly for employment sites).
- 5.15 Remove any reference to developers paying the contributions, this will come from landowners.
- 5.16 Must be made clear in 3.1 that an unallocated site will make a contribution.
- 5.17 Sites carried forward from adopted local plans must not be asked to contribute.
- 5.18 All development in the AHMA will have an impact on the strategic transport network and should contribute.
- 5.19 Sites in the RHMA could have an impact and should contribute, albeit at a lesser amount to reflect lower impact and land values.
- 5.20 The costs have increased from those initially proposed despite the inclusion of employment land.
- 5.21 Where sites have contributed significant funds, interventions in that area should be given priority.
- 5.22 There needs to be a mechanism to return contributions where projects come in under budget.
- 5.23 The SG should include a commitment from the SDPA to secure up-front funding.

6. Proposed solutions

- 6.1 Some form of means testing is needed and contributions should be based on a percentage of land value.
- 6.2 The solution is prudential borrowing and funding from the Scottish Govt.
- 6.3 The SDPA should take a lead role in identifying funding solutions.
- 6.4 A tariff that covers all planning gain headings would be welcomed, with the councils then trusted to build what is needed.
- 6.5 A bigger picture is the enabling of homes and jobs will generate more council tax and rates and create many jobs – would work like a giant BID.