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## Appendix 3: Responses to other documents

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**Rep. Number**

267 15                      **Subject**                      SEA

**Summary**

The SEA makes some fairly arbitrary assumptions about the potential impacts that different alternatives would have. In that document the councils have come to a view that the preferred housing allowances split will not be V1 or V2 but will be the one promoted in the draft structure plan. Without spending considerable time and money undertaking an independent SEA or having a clear idea of the logic behind V1 and V2 alternative housing splits it would be a fairly pointless exercise attempting to challenge the preferred housing allowances.

**Proposed Response:**                      **Acceptance:**      Do not accept                       Changes to be made

The assessment is proportionate, fit for purpose and appropriate for the type of plan being prepared. A number of spatial options were assessed (p40 of the Environmental Report). Table 28 (p52) and Appendix 6, Table B (p226 – 257) provide the detailed assessment of the alternatives identified in Schedule 1. The consultation authorities (SEPA, SNH and Historic Scotland) have all welcomed the comprehensive nature of the assessment.

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**Rep. Number**

278 8                      **Subject**                      SEA

**Summary**

Does not provide an assessment of a Westhill growth option, as as such the reason for exclusion is not apparent.

**Proposed Response:**                      **Acceptance:**      Do not accept                       Changes to be made

No settlements were assessed individually as part of the SEA process. A number of spatial options were assessed (p40 of the Environmental Report)and development in Westhill was considered as part of several of these.

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**Rep. Number**

319 8                      **Subject**                      SEA

**Summary**

Road accident statistics appear to be omitted from the EIA.

This does not properly recognise key environmental and human problems of existing commuting.

**Proposed Response:**                      **Acceptance:**      Do not accept                       Changes to be made

At an early stage, such issues were scoped out of the SEA. Consultation on the SEA Objectives as part of the scoping report did not raise the need to include this data which is more relevant to other plans and strategies.

319 9                      **Subject**                      SEA

**Summary**

Social problems are ignored from the EIA.

Problems are arising from family breakdown (following migration) and failures to integrate with more established residents - as a result of lack of social infrastructure and the sheer size and rapidity of poorly designed growth.

**Proposed Response:**                      **Acceptance:**      Do not accept                       Changes to be made

The SEA process is distinctly different from the Sustainability Appraisal process required of development plans in England and Wales. Social issues, such as those identified are not covered by SEA.

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**Rep. Number**

441 14 **Subject** SEA

**Summary**

The SEA is difficult to read. Table in in App.5 could be improved.

There are internal conflicts (p.27) re. holiday / second homes which will increase house prices and adversely affecting the tourist industry.

It is difficult to follow the thinking that leads to the conclusions under 5.52 and 5.53 (p.51), except for the beneficial effects on regeneration areas.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

It is recognised that the SEA is not an accessible document. However, the SEA is a technical document which is why it is legally required to be accompanied by a Non-Technical Summary. More effort will be put into improving the NTS and increasing the accessibility of the SEA of the first strategic development plan.

Holiday / Second homes – There is no internal conflict because they represent two different problems; (1) a shortage increases house price; and (2) a shortage damages tourist potential.

It is recognised that paragraphs 5.52 and 5.53 are difficult to follow and a revised wording will be provided.

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**Rep. Number**

465 12 **Subject** SEA

**Summary**

TSC9 - Have some concern with the Cumulative Impact Assessment table within the SEA. On p.323 the statement "Historic environment - concentrated loss or archaeological remains in the Shire from new development and the construction of the AWPR" does not relate to the findings of the AWPR Environmental Statement in terms of the number of known archaeological sites that may be affected by construction. It is requested that this inconsistency is resolved.

**Proposed Response:** **Acceptance:** Do not accept  Changes to be made

There is no contradiction here as the table makes it clear that it is identifying cumulative, secondary and synergistic effects. As such, both new development and the AWPR could lead to the loss of archaeological remains and this loss will be concentrated in particular areas. However, the table does not indicate the scale of any loss attributed to the AWPR – this is properly a matter for the Environmental Statement of the project itself.

The Non-Technical Summary of the Environmental Statement for the AWPR (August 2007) states that:

"There are a number of sites of cultural heritage importance located within the route corridor. The effects on these include direct physical impacts and indirect impacts on their setting. Where possible, the route of the road has been designed to avoid or reduce direct impacts or impacts on the setting. Where this has not been possible, archaeological recording is proposed for known sites where direct impacts are predicted. Works will also be undertaken to identify and record previously unknown sites. In addition landscape design proposals have been developed to reduce impacts on setting."

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**Rep. Number**

468 5 **Subject** SEA

**Summary**

Welcome that the SEA is clear and very thorough, subject to the following comments:

Non-technical summary

This section should summarise the environmental effects of the plan on the historic environment.

**Proposed Response:** **Acceptance:** Accept  Changes to be made

Recognition of a clear and thorough SEA is welcome. The Non-Technical Summary will be expanded and will include a summary of the environmental effects of the plan on the historic environment.

468 6 **Subject** SEA

**Summary**

Relevant aspects of the current state of the environment (baseline data) and additional baseline information

At the scoping stage we suggested the use of maps in relation to the plans proposals and actions. Note that Appendix 3 (Appendix 4 of the Scoping Report) does not include this information. Maps are useful for identifying and / or verifying potential impacts.

**Proposed Response:** **Acceptance:** Accept  Changes to be made

Maps will be added to aid the identification and / or verification of potential impacts.

468 7 **Subject** SEA

**Summary**

Assessment Framework - SEA Objectives and indicators

At the scoping stage asked that "and their settings" was added to Table 17 after "safeguarding archaeological sites" and after "listed buildings, designed landscape". However, note that mitigation framework measures in Appendix 7 prevents "development adversely affecting historical sites and their setting" and are content.

**Proposed Response:** **Acceptance:** Noted  Changes to be made

The recognition that amendments were made following the scoping stage is welcome.

468 8 **Subject** SEA

**Summary**

SEA of the draft structure plan

The tables in Appendix 5 sometimes have different conclusions for the impacts on the historic environment than those in the summary tables in the main ER (i.e. Table 22 and 29). Assume this is a summary of impacts of the two SEA objectives, but should this be the case, it would be helpful to provide a footnote in the summary to explain this.

**Proposed Response:** **Acceptance:** Accept  Changes to be made

Tables 22 and 29 do provide a summary of the impacts against the two SEA objectives. A footnote will be added to clarify this.

468 9 **Subject** SEA

**Summary**

SEA of the draft structure plan

Note in Appendix 5, Table B that some of the alternative options for the spatial strategy are not assessed for the historic environment, but are included in the summary Table 27 (alternatives 2b, 2c, 3b and 3c). May be that other information was used to inform the assessment of impacts, would be useful if the reasoning for any gaps was provided in the commentary box.

**Proposed Response:** **Acceptance:** Do not accept  Changes to be made

The options were assessed but the different options were not seen as having differential effects. As a consequence, one symbol was used and the table merged over the alternatives (a/b/c). This was done for a number of the objectives, not just those relating to the historic environment. Objective 8 (page 235) appears to be the odd one out – however, no amendment is required.

468 10 **Subject** SEA

**Summary**

Mitigation Framework

Welcome the proposed mitigation framework in Appendix 7, which is clear and sets out the measures proposed and identifies who is responsible for ensuring this mitigation is delivered. Would be helpful if the SEA Adoption Statement clearly identifies the potential environmental issues to be explored in lower level plans and includes a commitment to ensuring that this will be taken forward as the plan is implemented.

**Proposed Response:** **Acceptance:** Noted  Changes to be made

It is likely to be towards the end of 2009 that the Scottish Ministers approve the plan so the SEA Adoption Statement is still some way off. However, this will be noted for future reference.

468 11 **Subject** SEA

**Summary**

Monitoring

Note that Table 31 includes indicators for monitoring changes to the baseline. May also wish to monitor the number of planning applications affecting listed buildings, scheduled monuments, and gardens and designed landscapes.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

It is agreed that these indicators are worthwhile in relation to monitoring the environmental baseline. However, it is likely to be more appropriate for these to be monitored and reported through the local development plan SEA rather than the structure plan.

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Rep. Number

479 1 Subject SEA

**Summary**

Pleased to note that many suggestions offered at the scoping stage have been accommodated in the report. It offers a comprehensive assessment of the likely effects on the environment and a detailed list of measures in the mitigation framework. Note that a full appropriate assessment has yet to be undertaken on the 8 eight spatial options on Natura sites. If an Appropriate Assessment has been completed on the preferred option we would be pleased to receive a copy and comment as appropriate.

**Proposed Response:** **Acceptance:** Noted  Changes to be made

The recognition that amendments were made following the scoping stage and the comprehensive nature of the assessment are welcome. The Environmental Report (July 2008) contained a screening exercise but not a full appropriate assessment. This has now been completed with the advice of SNH who have made comments as appropriate and the assessment amended in light of them.

479 2 Subject SEA

**Summary**

SEA Topic: Biodiversity - Conserve protect, maintain and enhance biodiversity (including ecosystems, habitats, species and genetics).

Establish a green network in and around Aberdeen City and the three strategic growth areas in order to ensure:

1. A planned approach to creating and protecting wildlife corridors;
2. Allow for the migration of species affected by climate change;
3. Protect species and habitats from inappropriate development; and
4. Improve public access to the natural environment.

**Proposed Response:** **Acceptance:** Accept  Changes to be made

The issue of accessible greenspace and Core Path Plans have been reflected in the text of the Finalised Structure Plan.

479 3 Subject SEA

**Summary**

SEA Topic: Human Health - Improve accessibility to good quality open greenspace and countryside

Establish a green network in and around Aberdeen City and the three strategic growth areas in order to ensure:

1. A planned approach to creating and protecting wildlife corridors;
2. Allow for the migration of species affected by climate change;
3. Protect species and habitats from inappropriate development; and
4. Improve public access to the natural environment.

Development plan should locate new developments to safeguard and allow easy access to the core path network.

**Proposed Response:** **Acceptance:** Accept  Changes to be made

The issue of accessible greenspace and Core Path Plans have been reflected in the text of the Finalised Structure Plan.

479 4 Subject SEA

**Summary**

SEA Topic: Landscape - Protect and enhance and where appropriate restore the quality and distinctiveness of the area's landscape character and townscapes

The development plan should include objectives/policies that discourage large scale windfarms around the periphery of the Cairngorms National Park in line with the duty to 'have regard' to the Park Plan. The Plan should also set out criteria for assessing areas where wind farms would or would not be likely to be acceptable in relation to achieving this objective.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

The issue of the Cairngorms National Park has been reflected in the text of the Finalised Structure Plan.

479 5 Subject SEA

**Summary**

SEA Topic: Climatic Factors - Reduce causes of adverse climate change

The development plan should include proactive proposals for the requirement for domestic and local scale heating and power generation.

**Proposed Response:** **Acceptance:** Accept  Changes to be made

The issue of combined heat and power schemes has been reflected in the text of the Finalised Structure Plan.

479 6 **Subject** SEA

**Summary**

Suggested alternative information required to monitor effects of the plan.

BIODIVERSITY (please see table 2 of representation for detail of what sort of information is required, where it can be obtained, who is responsible and when).

**Proposed Response:** **Acceptance:** Do not accept  Changes to be made

This level of information is not appropriate for monitoring the effects of the structure plan because it does not determine the use of particular sites.

479 7 **Subject** SEA

**Summary**

Suggested alternative information required to monitor effects of the plan.

LANDSCAPE AND BIODIVERSITY (please see table 2 of representation for detail of what sort of information is required, where it can be obtained, who is responsible and when).

**Proposed Response:** **Acceptance:** Do not accept  Changes to be made

This level of information is not appropriate for monitoring the effects of the structure plan because it does not determine the use of particular sites.

479 8 **Subject** SEA

**Summary**

On p.66 the table refers to "the number of notified or qualitative interests (e.g. protected habitats and species) adversely affected by new development". However, the correct terminology for Natura 2000 sites is "qualifying interests" and for SSCI's "natural features".

**Proposed Response:** **Acceptance:** Accept  Changes to be made

It is agreed that the text included a typo and this will be corrected.

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**Rep. Number**

481 1 **Subject** SEA

**Summary**

1. General Comments

The Environmental Report (ER) is well presented and seems to cover well all the aspects required by the Act. SEPA welcomes the fact that all aspects of the Plan seem to have been clearly assessed.

**Proposed Response:** **Acceptance:** Noted  Changes to be made

The recognition of the comprehensive nature of the assessment is welcome.

481 2 **Subject** SEA

**Summary**

2. Detailed Comments

1. SEPA is satisfied that all the relevant background information is provided.
2. SEPA is satisfied that all relevant plans, programmes, strategies and environmental protection objectives have been identified and notes that those which SEPA identified as missing at the scoping stage have now been included.
3. SEPA considers that Table 5, presenting the linkages between SEA topics, is a useful and interesting exercise.
4. SEPA is satisfied with the information presented on significant environmental problems. This seems suitably specific to the area but wide ranging in the types of issues it considers.

**Proposed Response:** **Acceptance:** Noted  Changes to be made

This expression of support is welcome.

481 3 Subject SEA

### Summary

#### 5. Comment on SEA Objectives

5.1 SEPA notes the second SEA Objective on water has changed since the scoping stage. SEPA notes that it only relates to the marine environment, but in view of the additional comments provided in the text, presumes that this is a mistake and that it relates to the whole water environment.

5.2 SEPA is disappointed to note that its request that a SEA Objective specifically covering sustainable waste management has not been acted upon. As a result the impacts of the Plan on waste management may have been under-assessed.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

While the wording of objective 2 (p29) was amended following the scoping report, the scope of the objective has not and it does relate to the whole water environment and not just marine issues.

SEPA were informed in 2007 that its request to include waste as a separate SEA objective was not supported and that its inclusion in the soil objective was appropriate. The plan recognises waste as an issue, as well as the need to make significant changes to the way waste is managed.

However, it is unable to go beyond these general statements at the current time. The plan does identify the need for strategic supplementary guidance on the issue of waste management facilities and it will be the SEA of this guidance that will be the appropriate process to address this issue.

481 4 Subject SEA

### Summary

#### 6. Alternatives

6.1 The section on alternatives makes it clear how difficult and involved the process of plan-making can be.

6.2 SEPA considers it a practical approach to have only fully assessed those alternatives which were truly considered for inclusion in the Plan. Table 19, highlighting the general types of strategies which were rejected and the reasons for doing so is helpful to explain the early process.

6.3 SEPA is satisfied with the assessment of the eight strategic options as presented in Appendix 5, Table C and the summary of it given in paragraph 5.22 and Table 20. SEPA agrees that it seems reasonable to suggest that the least negative effects will be found if development is concentrated into already developed areas (i.e. Aberdeen City and the existing transport corridor).

7. SEPA is pleased to note that all aspect of the current Plan that could have significant effects has been assessed. ie. the vision, aims, spatial strategy and strategic objectives.

**Proposed Response:** **Acceptance:** Noted  Changes to be made

This expression of support is welcome.

481 5 Subject SEA

### Summary

#### 8. Assessment of Vision and Aims

8.1 SEPA understands that rather than assessing the vision and aims directly these were broken down into 12 principles and these principles were assessed instead. Such an approach is useful for determining whether the vision and aims cover all the principles which the Authority consider are important, however, it may limit the ability to use the assessment as a way to improve the wording of the individual aims and vision.

8.2 Notwithstanding the comments in 8.1 above SEPA considers that the assessments presented in Appendix 5 Table A seem reasonable. SEPA notes that paragraph 5.35 identifies that the economic growth principle is the only principle which is likely to impact negatively on the SEA Objectives. SEPA agrees that there will be negative effects from this principle and considers that they may have been under-recorded in the current assessment. SEPA previously raised this issue when given the opportunity to comment on the draft assessments. For example:

8.2.1 No explanation is provided as to why the economic growth principle may have both positive and negative effects on the first air SEA Objective;

8.2.2 Similarly economic growth is assessed as having no (i.e. 0) effect against the second SEA Objective on water, yet the supporting text identifies both positive and negative effects relating to this; and

8.2.3 The economic growth principle is assessed as having a positive effect on reducing the area of land contamination (SEA Objective 6), yet the supporting text identifies that there might be an increase in potential contaminated sites.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

The limitations of the approach adopted are recognised but the recognition that the assessment seems reasonable is welcomed.

The three examples provided have been reviewed...

**Summary**

## 9. Assessment of the Spatial Strategy

9.1 Generally the assessments presented in Appendix 5 Table B also seem reasonable. SEPA takes the opportunity to highlight the following.

9.1.1 SEPA understands that the Western Peripheral Route will be delivered no matter the subsequent development proposed by the Plan. If this is the case it is not clear how development in Aberdeen City will have a positive effect against the first air quality SEA Objective.

9.1.2 It is not clear why development in Aberdeen City would have no effect on the marine / water environment SEA Objective (objective 2). SEPA agrees that the other spatial strategy element are likely to have negative or significantly negative effects against this SEA Objective and this should be considered when determining appropriate mitigation.

9.2 Summary Table 27 is perhaps expressed more positively than the associated detailed assessments in the appendix. For example, the City is assessed as positive (i.e. +) against the Water SEA Topic in the summary table yet the individual assessments are '0', '-ve', '+', and '+'. SEPA would consider that a summary of this would be better expressed as mixed.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

The general recognition that the assessment seems reasonable is welcomed.

Development in Aberdeen will encourage walking, cycling and the use of public transport rather than car-based journeys into the City. The impacts will be mixed but the nature of that mix will be determined by the way the plan is implemented through local development plans.

It is agreed that development in Aberdeen would probably have a negative effect in the same way as other elements of the strategy on objective 2.

It is recognised that the summary may over-state the positive and a mixed summary would be more appropriate.

481 7 Subject SEA

**Summary**

## 10. Assessment of Strategic Objectives

10.1 SEPA notes that the six strategic objectives have been assessed against the SEA Objectives for each of the six growth scenarios. This is a comprehensive approach.

10.2 It is not clear, in its own right, how the Economic Growth Objective will have positive effects against the air SEA Objective. In comparison it is clearer why the Objective will have been assessed positively against SEA Objective 24 on assets, as the objective itself states that it will improve essential strategic infrastructure.

10.3 SEPA agrees that the Sustainable Development and Climate Change objective will have a positive effect against the SEA objective 4 on flood risk. The SEA Objective itself is more appropriately focused on the issue than the wording of the related target in the Plan; SEPA provides detailed comments on this in its separate response to the Plan. If SEA Objective 7 covers sustainable waste management then SEPA considers that the assessment is less positive than has been recorded. SEA considers that the Objective and supporting text does not provide clear guidance on how sustainable waste management will be achieved. Again further comment on this is provided in SEPA's response on the Plan.

11. The monitoring framework outlined in Table 31 is clear and seems to be well considered.

12. SEPA would have welcomed at this stage information on how carrying out the assessment had impacted upon the draft Plan. This should be provided in the Post Adoption Statement.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

The recognition of the comprehensive nature of the assessment is welcome.

Economic growth will have positive as well as negative impacts will come about through the replacement of employment with less polluting uses (centred around the knowledge economy), encouraging growth on a scale which makes higher environmental standards possible and locations which make communities more sustainable.

Flooding & Waste - the text of the finalised plan has been amended in light of SEPA's comments.

It is likely to be towards the end of 2009 that the Scottish Ministers approve the plan so the SEA Adoption Statement is still some way off. However, this will be noted for future reference.

**Rep. Number**

286 14 Subject Background Paper

**Summary**

Some sites should not be included in the UCS, specifically; Woodend Hospital Annexe, Hillhead and Dunbar Halls and Triple Kirks. Also, Denburn and Woolmanhill cannot be considered for high density due to Listed Buildings present and a number of others are within the community regeneration areas and a decision needs to be taken whether these contribute to brownfield figures, or not, to avoid double-counting.

**Proposed Response:** **Acceptance:** Noted  Changes to be made

The urban capacity study provides a snapshot of brownfield land with potential for housing at 1 January 2007. As time moves on, sites are developed, new sites come forward and existing sites become more or less likely to be developed for housing. The purpose of the study is to provide evidence to support assumptions about the rate of new housing on brownfield sites. The issues raised do not undermine the assumptions made.

**Rep. Number**

416 1 Subject EqHRIA

**Summary**

Found the assessment deficient in many ways and believe that some assistance should be sought in completing it. It would not stand up to any scrutiny.

It is deficient in relation to many of the equality streams:

\* impact on race is not considered at all

\* issues to do with inward migration have not been addressed in view of the major impacts that this has had on all service provision in the north east

Impact assessments are not tick box exercises - they should be done properly and with some thought using existing research and evidence etc to ensure that we do not repeat the mistakes of the past.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

The EqHRIA has been produced following the principles set down in the guide published by Aberdeen City Council and is robust in its analysis of the structure plan and its potential impacts on the identified minority groups.

Inward migration has not been explicitly mentioned in this document, but is included in the race category. In terms of quantifying in-migration, this has been covered in the Report of Survey and the Population and Household Forecasts and Projections in the Background Paper.

The process for producing the EqHRIA has been thorough and resulted in a change to the plan; this is evidence that it was more than a 'tick box exercise'. The amended assessment is also clear that this is part of an ongoing assessment of development plans.

416 2 Subject EqHRIA

**Summary**

Does not believe that the assessment has been undertaken in a professional way. Believes that there are adverse impacts that have not been considered nor addressed.

Particular area of concern is in relation to Gypsy Travellers. There has been an increase in numbers in recent years taking to the roads and a decrease in service provision in terms of pitches on official sites. Also there has been little or no progress (progress on paper maybe) on delivering halting sites for them.

Suggest that the assessment is done again be a little more open and honest about it. Planners have already been advised on some of these matters but appear to be ignoring them. Gypsy Travellers have considerable difficulties in relation to planning matters.

Has already been in contact with the EHRC about this matter and suggested discussing this issue with them, the Scottish Gypsy Traveller Law Reform Coalition and Planning Aid.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

An amendment to the sustainable mixed communities section of the plan is proposed to refer to Gypsy / Travellers. Amend 3rd paragraph to read:

"It is important that new development meets the needs of the whole community, including the specific needs of Gypsies / Travellers. With an ageing population and smaller households, new development will need to meet the changing needs of society over its whole life."

Planning Aid have provided a research findings paper on the 'Reach Out' project, which provides factual information, advice on involving Gypsy / Travellers in the development plan process and facilitating site delivery instead of constructing planning policies around blocking sites. The proposed wording change in the plan emphasises the fact that "the whole community" includes groups whose needs may be different and emphasises the importance of meeting those needs.

It will be for the local development plans and/or supplementary guidance and local housing strategies to address these issues in greater detail.

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**Rep. Number**

453 2 Subject EqHRIA

**Summary**

Surprised no negative response has been recorded against "Race" as Gypsy/Traveller is included here. It is important to recognise the needs of the Gypsy/Travellers and not encroach on land they already use as part of their nomadic way of life. By setting targets in relation to allocation of land for housing and business etc. travellers may become squeezed out of sites currently used and become victims of hostility or harassment. No authorised sites at present.

**Proposed Response:** **Acceptance:** Partially accept  Changes to be made

Although the text of the draft plan was written in an inclusive manner, an amendment to the sustainable mixed communities section of the plan is proposed to refer to Gypsy / Travellers. Amend 3rd paragraph to read:

"It is important that new development meets the needs of the whole community, including the specific needs of Gypsies / Travellers. With an ageing population and smaller households, new development will need to meet the changing needs of society over its whole life."

The issues of identifying the need for authorised sites and site identification are for local housing strategies and local development plans rather than the structure plan.



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**Rep. Number**

454 3

**Subject**

EqHRIA

**Summary**

Although the EHRIA carried out on the draft Structure plan in April 2008 came back having a neutral impact on gypsies, ethnic minorities etc the evidence drawn upon for this was a consultation workshop held on the 7 November 2006 for Communities of Interest Forums to identify the main issues. It is suggested that the demographics of the area has changed greatly in this time and that further consultation should be considered. Access to affordable housing was identified as a high priority issue in the findings from the Ethnic Minority Forum consultation held on 21 June 2008.

**Proposed Response:****Acceptance:**

Partially accept



Changes to be made

The workshop on 7 November 2006 was one element of the evidence gathering process for the preparation of the stage 1 assessment. The Communities and Interest Forums have been kept up-to-date throughout the plan's development and the opportunities to engage in the process.

Any changing demographics over the period of 18 months are very unlikely to invalidate the conclusions of this assessment given the strategic nature of the plan. However, those involved in the preparation of the assessment were involved in Communities of Interest issues over this period and would have been aware of any changes taking place.

The issue of affordable housing is covered in the plan and amendments to the draft plan make it clear that it is critical for the delivery of sustainable mixed communities.