

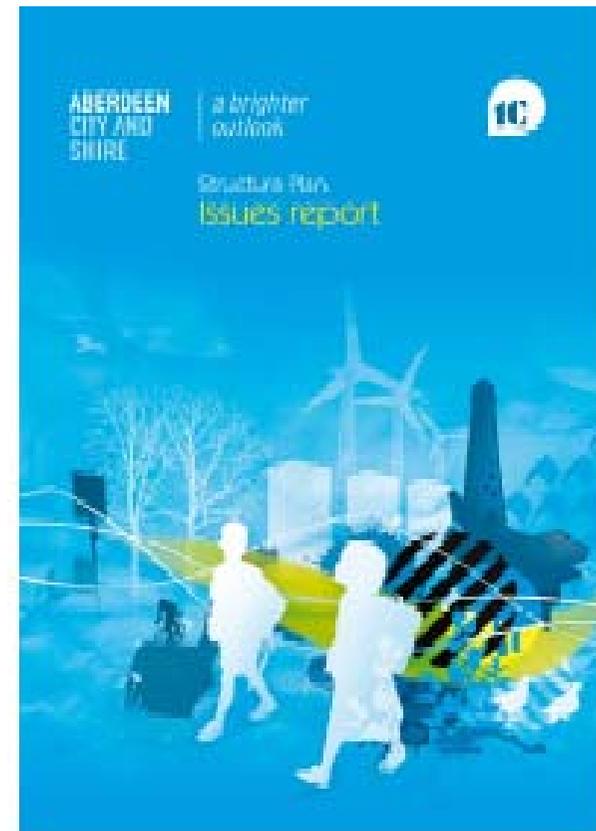
Aberdeen City and Shire Structure Plan

Issues Report

Schedule of summarised representations and the commentary by the Structure Plan Officers Group

This schedule is the basis of the conclusions presented to the Aberdeen City and Shire Strategic Planning Committee on 25 June 2007.

It is ordered alphabetically according to surname (for private individuals) or the organisation of the respondent.



Mrs A Ferries

AS.28.1	I support the draft vision.	Noted.
AS.28.2	Caution should be exercised to allow people the freedom of choice of where to live and work, without undue pressure from the council.	Noted. It is acknowledged that the plan requires to provide choice in location of homes and businesses.
AS.28.3	The needs of the elderly must be considered.	Our draft vision states that in order to achieve our vision we will consider the needs of all our different communities fairly. However housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document.
AS.28.4	Agrees that priority should be given to improving the area people live in and to reduce inequality.	noted
AS.28.5	Consideration should be given to rural areas, such as the farming community, who can play an important part in tackling climate change.	Noted.
AS.28.6	Rural businesses should be encouraged and supported.	Noted.
AS.28.7	Development is vital to the areas economy. Some green belt is necessary, but small areas may be more appropriate than large.	Noted. The need for a green belt in Aberdeen will be considered during the preparation of the draft plan, in accordance with Scottish Planning Policy 21: Green Belts.
AS.28.8	Housing is extremely important. Aberdeenshire has a crucial housing crisis, which has been forecast for some time now, and has been largely fuelled by the refusal of planning permission. Co-operation rather than confrontation is required.	We are aware that the allocations in NEST are running out and are consequently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development over the next 25 years and also the preferred locations. A technical evaluation will be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AS.28.9	The cost of improved design needs to be kept under control.	Developers/applicants are encouraged under planning advice notes (and under existing development plan policies) to improve the design of any new development, which is likely to be reflected by the budget they have allocated towards it.
AS.28.10	Support should also be given to smaller local jobs, instead of allowing supermarkets to dominate.	Noted. This is implicit in the national policy objective of supporting existing town centres.

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AS.28.11	The mobility of the elderly, and rural residents who use local shops the most should be considered.	Noted. Shopping facilities are promoted in accessible locations to accommodate such concerns.
AS.28.12	The contribution rural businesses make should not be forgotten about.	Noted. Rural businesses make an important contribution to rural communities, but also to the region. For example, farming and tourism have been important sectors of the regional economy. It will be important not to overlook the land-use needs of industries typically associated with the rural environment. Equally however, it should be noted that the structure plan does not provide an economic strategy, but a land-use strategy and it will be important for the structure plan to support the various economic objectives for the region.
AS.28.13	Increasing rural businesses could reduce road congestion.	Noted. Road congestion may be better served by providing employment opportunities at locations accessible by public transport.
AS.28.14	Make sure services are made available where they are required.	Noted
AS.28.15	Rural areas could provide renewable energy.	Noted.
AS.28.16	Agree with the statement made in the Issues Report (protecting and managing the area's built, cultural and natural heritage).	Noted. The support is welcomed
AS.28.17	Waste management facilities should be as near as possible to the source of waste. Highlighted that the ORAN group will soon be operating a new rendering plant at Kintore.	Noted.
AS.28.18	The Kintore area is an excellent example of how a rural district can absorb small industries.	Noted.

Mrs Marjory Gordon

AS.64.1	Would like information on the procedure for the consideration of land for rural housing developments, and proposes two sites for residential development: Bridgefield, north of Inverbervie (1.81ha) and Mill of Uras, south of Stonehaven (4.42ha). Both sites are sited near to the A90, and would maximise renewable resources.	Noted.
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Mr G Ingram

AC.6.1	The region's ageing population means that a decline in the size of the work force will be experienced, during the lifetime of the plan.	Noted.
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AC.6.2	The update of the present structure plan represents a waste of tax payers money; there is no need to prepare structure plans, given that local plans are more effective.	Structure plans provide effective coordination at the strategic and pan-authority level that is not available elsewhere. They are required to be produced by law. The Planning etc Scotland Act 2006 continue to recognise the need for strategic plans in parts of Scotland.
AC.6.3	It is doubtful whether the Aberdeen Western Peripheral Route will be built. Aberdeen is too far north of the central belt of Scotland for politicians to commit the necessary funding.	The Scottish Executive has committed funding to a number of projects in the North East, including the Aberdeen Western Peripheral Route.
AC.6.4	The building of flats rather than houses will not encourage small households to choose small homes; a change in lifestyle may be required to encourage this.	The plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community.
AC.6.5	More should be done to sustain the rural way of life.	Noted. The importance of "quality of life" as well as providing for a range of lifestyles are identified in the draft vision.
AC.6.6	Activities suitable for the older age groups should be developed, to serve the ageing population.	This is not a structure plan issue.
AC.6.7	The use of a car is a must for rural areas because there is no opportunity to use public transport. People from rural areas wish to travel across the region and not just to Aberdeen.	SPP15 suggests that development plans should be realistic about the availability of alternatives to the car, in planning for rural areas - this should be taken into account in considering where future development should take place. A structure plan is a long-term strategic document and can enable future development to occur in areas accessible by non-car modes of transport, or so as to reduce the need to travel for work and leisure.
AC.6.8	There are too many listed buildings. When old buildings are restored, generally only part of the structure is retained. By contrast, owners of listed properties cannot undertake alterations. Is this not wrong? Elected members should decide whether to save buildings on the buildings at risk register.	Listed buildings only account for a small percentage of the total building stock, and the type of work permitted to the listed building (e.g. if alterations are proposed) depends on the classification of the building (A to C(S)). The demolition of buildings on the at risk register is not a structure plan matter.
AC.6.9	A concerted effort is needed, with appropriate incentives in place, to reduce the level of household waste sent to landfill sites. Schemes to encourage recycling must be adequately thought through and support other objectives (e.g. to reduce reliance on the private car).	Noted. Schemes to change peoples habits on waste cannot be addressed in the development plan. However, where a national or regional scale development is proposed (e.g. in the National Planning Framework 2), this could be set out in the structure plan. Other local scale developments will be addressed in the local plan.
AC.6.10	Skills shortages across the region have been created by employers, by their unwillingness to take a long term view on the economy. Very few managers in the construction industry have practical experience, at a less senior level.	There are a variety of factors that may be considered to have an effect on the availability of skilled labour. The structure plan could be used to provide additional housing to support inward migration, which may address the lack of skilled labour.

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AC.6.11	The development of large supermarkets should be balanced by a consideration of the needs of local traders, in central locations. They normally have to pay a high rate for floorspace, due to their location within settlements.	Noted. This is implicit within National retail policy as articulated by SPP8.
AC.6.12	There will always be areas of deprivation when settlements become too large for the local employment opportunities available. The plan should help address these problems.	All of the the spatial strategies which are currently under consultation have taken into consideration the guidance set out in SPP3 which highlights that there is a need to ensure that all sections of the community have good access to jobs and services in order help settlements develop sustainably.
AC.6.13	The re-development of brownfield sites for housing raises concerns regarding the density of development and the small size of the flats and houses. The quality of the workmanship is also of concern.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the the preferred locations and appropriate scale of land that should be released for development in the region. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AC.6.14	Land for industrial purposes is being lost, as more money can be made by developing land for housing purposes.	Noted. At least two issues of importance have been raised here. Firstly, there is the issue of providing sufficient housing land, to satisfy demand for new housing. Secondly, there is the issue of the lack of opportunities for business and industrial development due to the high value of employment land. It may be noted that high land values can affect the growth of the particular sectors of the economy (e.g. manufacturing and engineering), for it is then more economically viable to market land for uses that achieve high rents (e.g. office developments). Both of these issues will need to be taken into consideration by the next structure plan.
AC.6.15	Transport ambitions need to be considered in a common sense manner. There is only one railway line serving the region and buses in rural areas terminate in Aberdeen. There are very few alternatives to the car, when travelling in the rural areas of the region.	Noted. SPP15 suggests that development plans should be realistic about the availability of alternatives to the car, in planning for rural areas - this should be taken into account in considering where future development should take place. A structure plan is a long-term strategic document and can enable future development to occur in areas accessible by non-car modes of transport, or so as to reduce the need to travel for work and leisure.
AC.6.16	The idea of making it easier to get to destinations by foot, bicycle or public transport is unpractical in the rural area, when people have to travel to the city or do not have a fixed base for work.	Noted. SPP15 suggests that development plans should be realistic about the availability of alternatives to the car, in planning for rural areas - this should be taken into account in considering where future development should take place.

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AC.6.17	Contemporary solutions to transport problems, such as road pricing, are ill-conceived. There is no real solution to these problems.	The Regional and Local Transport Strategies set the transport policies for the region and it is in these documents that specific measures to address the region's transport problems are found. The structure plan can help to address transport-related problems, by providing for the future development of the region in ways that reduce the need to travel (e.g. by requiring employment land to be in close proximity to housing development) and facilitate an increased use of sustainable modes of transport (e.g. increased rail use).
AC.6.18	Supermarkets offer shopping convenience and cars are required by their customers, in order to get the shopping home. Encouraging the use of public transport for shopping trips is undesirable, as such modes of transport are inconvenient for this purpose.	Noted. All developments, and especially developments with a wide public catchment, should be accessible by public transport, as not everyone has access to a car.
AC.6.19	The data presented in the Report of Survey is misleading at times - for instance, Table 5d does not account for the rural areas with no access to the rail network. It should be noted that tables of data can be constructed to show whatever trend the researcher wishes to show.	Noted. The report of survey has not been produced to support any particular viewpoint, and every attempt has been made to make it value free.
AC.6.20	Passengers travelling to Aberdeen by train must alight at the main railway station; this means that they usually have to take a bus to get to their final destination. This makes train travel less desirable.	Noted. The structure plan can only have a secondary impact on this issue, through the improvement of strategically important public transport links. For example, by providing a strategy for the development of the region that provides a critical mass of users in appropriate locations, it would be economically feasible to invest in the improvement of transport links. The Regional and Local Transport Strategies set the transport policies for the region and suggest specific measures for the integration of different services and modes.

Mr David Jack

AS.2.1	Consideration should be given to future planning policy for wind turbines. Planners should take account of turbine noise and not be influenced by extravagant claims by the developer of the benefits and efficiency of wind generation. Wind turbines are heavily subsidised, and are therefore an attractive financial investment for the developer.	Noted.
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Mrs Genevieve Jones

AS.25.1	The vision is very general and thus meaningless.	Noted. The vision is a statement of aspiration. Specific land-use planning goals that reflect the vision (as revised), as well as the issues that the plan should address, will be made clear in the plan's aims and objectives and through the choice of an appropriate strategy.
AS.25.2	The hard choices that need to be made should all relate to the issue of climate change. This issue is the priority.	Noted.

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AS.25.3	Quality of life across the region is deteriorating, as a result of the over-development of the coast and countryside. Access to the countryside by non-car modes of transport is being made more difficult.	
		The plan could help to stop and reverse any perceived deterioration in the quality of life, due to the development of the countryside. For example, a strategy could be adopted so as to minimise future impacts on the natural environment and to allow for environmental enhancement in other ways (this might be achieved, for instance, through the creation of well-designed new communities). The Regional and Local Transport Strategies for the region propose measures to improve access to public transport - e.g. supporting the provision of high quality transport interchanges. The development strategy and future policies of the plan could assist in improving access to public modes of transport and could help facilitate the development of such interchange facilities, so as to enable improved access between rural and urban areas.
AS.25.4	In order to reduce our impact on the environment, it could be argued that we should aim for economic stability rather than economic growth.	Noted.
AS.25.5	It makes sense to grow existing settlements, however large dormitory settlements should not be attached to small communities. Doing otherwise destroys the social cohesion of a community.	Noted. Social cohesion and "quality of life" issues have to be given serious consideration in the allocation of development to locations.
AS.25.6	New housing within the region's villages should be limited to affordable housing, for those working in the local area. This housing should remain affordable over time. Good quality housing should always be available for rent.	Noted. The local housing strategy will provide the evidence for the need for affordable housing while the structure plan may indicate the scale and general location of any shortage of affordable housing.
AS.25.7	Small local shops in rural areas should not be allowed to convert to housing. If local shops in rural areas are kept open, this reduces the need to use a car for shopping.	This comment requires questions about the viability of rural shops and whether change of use for such a shop is more desirable than leaving it empty. Policy on the maintenance of rural shops is a matter for the local plan to address.
AS.25.8	No large settlement should be built without easy, car free access to a shop.	Noted.
AS.25.9	Sustainable and green technologies (e.g. re-use of rainwater, solar hot water systems) should be standard in new housing. Existing environmental features such as dry stone walls should be retained and incorporated into new developments and street lighting must be energy efficient. Developments should consist of more than one housing type and new homes must be checked for compliance with Building Standards, after construction.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.25.10	The building of new industrial estates is an environmentally damaging way of creating jobs. Employment opportunities should be provided close to the region's towns and villages; they should not be concentrated in areas around Aberdeen.	In order to provide an economically sustainable future for the region, there is a need to provide a range and choice of locations for development, to suit the diverse needs of industries and businesses. The preference for providing for an even distribution of employment opportunities across the region's settlements (as opposed to adopting an approach that centralises employment-related development in Aberdeen) is noted.

Councillor Bruce Luffman

AS.18.1	The first paragraph of the vision is too detached from reality for the man in the street who is more concerned with safety, affordability of housing and affordability of transport	Noted.
AS.18.2	The latter parts of the vision statement will be seen as blandishments as these values have not been delivered in the past by the existing structure plan.	This comment suggests re-wording the vision so as to distinguish the statements in the last paragraph from the statements in the vision of the current structure plan, NEST.
AS.18.3	The man in the street is not listened to by the policy makers in their "ivory towers"	The proposals we have put in place for early engagement on the plan (and our performance to date in forums across Aberdeen and Aberdeenshire) are an attempt to avoid the "ivory tower" image.
AS.18.4	The vision is a catch all for good intentions. The statement relating to considering the needs of communities should be "engaging with, empowering, transferring some power of decision to the communities" and not have everything controlled by the faceless bureaucrat when it comes to designing and delivering the Structure Plan.	We have undertaken a significant process of engagement with communities and other interests on the plan.
AS.18.5	The 3rd bullet point should mean what it ought to say - the change should be the people's hard choices for change (through better informing them and through not making communities feel that everything is imposed upon them).	It is recognised that other stakeholders (not just the two Councils) will have to make difficult choices, in order to deliver the required change.
AS.18.6	Past ideology has worked against rural areas through inhibiting growth in small rural areas and proposing huge tranches of housing into existing centres	Noted. The next plan requires to provide opportunity for rural areas in accordance with national policy as outlined in Scottish Planning Policy 15 "Planning for Rural Development" which seeks to be "more welcoming" to development in the countryside in appropriate locations.
AS.18.7	Huge allocations in rural settlements have left infrastructure and services lagging behind	This is recognised as an issue that future allocations will have to seek to address.
AS.18.8	The growing population of rural areas should be encouraged through the provision of employment and housing land to sustain and increase the small rural communities.	Noted. While it is possible to allocate employment land in these areas current experience is that take up of such land is very low. While the planning system can allocate the land, market forces will dictate where attractive places to do business may be.
AS.18.9	We need to have more accurate needs and numbers assessments made for all our communities to give us a clearer picture of how to react, plan and invest for the demonstrated demographic changes over the next 15 years.	One of the approaches we are considering for the plan is that of planning for the effect of policy intervention above the forecasts. Forecasts are notoriously fickle and actions we take over the 25 year life of the plan are likely to result in a future very different from that which forecasts might predict.

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AS.18.10	We have failed to address this over the last 11 years. Disadvantage in the west of Aberdeenshire has not been assited by lack of opportunity for development, stretched services and lack of innovation to overcome the issues. Current policies work against regeneration in rural areas and this must be addressed by more innovative policies and recognition of the different dynamics for rural areas.	Noted. We are currently undertaking research into rural typologies which shall be incorporated into the plan. The identification of rural typologies provide a way of not only reflecting the differences between rural areas, but also tailoring development policies and decision making to reflect these differences.
AS.18.11	Issues are as big for small rural communities as for the City, but on a different scale and it is arrogant to suggest that local needs are not also big issues. Small communities need to be given equal importance within the plan in terms of permissive planning and social policies to achieve that goal.	We recognise that the issues affecting urban areas also affect rural areas. The needs of small communities might better be addressed by more localised plans, rather than that at a strategic level. Care has to be taken that the strategic framework permits local solutions.
AS.18.12	I agree with the statements made but suggest that the definition of appropriate development is provided to avoid dubiety. This should include small scale tourist accomodation associated with frarm diversification and small buisness start up units on farms.	Scottish Planning Policy 21: Green Belts, allows the development plan to specify which developments are appriariate in the green belt. This is likely to be an issue considered by local plans.
AS.18.13	There should be opportunity to infill on the City side of the AWPR	Noted. This would have to be undertaken so as not to impact on the AWPR as a trunk road. This is taken as support for a City growth strategy.
AS.18.14	Housing in the structure plan has been an unmitigated disaster and we need to positively intervene in the housing market in the same way as being proposed by the CNPA.	Noted.
AS.18.16	The plan must not take account of housing already developed so as not to double count.	The plan will take into account houses which have already been developed in order to ensure that there is no double counting.
AS.18.17	The plan should identify what is constrained and unlikely ever to be built and remove it.	Many constraints to development can be overcome dependant on the scale and profitability of proposed developments.
AS.18.18	We need assessments of the need for social housing and what is reasonable to build in the time span of the plan	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document.
AS.18.19	We need to know what housing is needed that is affordable through survey and assessment	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document. A Local Housing Needs Assessment has recently been undertaken in both Aberdeen and Aberdeenshire.
AS.18.20	Community needs assessments are required for housing in rural areas	Housing needs is an issue for the Local Housing strategy and the structure plan will draw on the information from that document

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AS.18.21	Plan policies have to allow home based working and the establishment of small rural businesses	Noted. The structure plan will address the land-use implications of providing for rural economic development, from a strategic perspective - that is, from the point of view of the long term development of the region as a whole. The plan's likely implications for rural employment will be identified and considered in the technical appraisal of possible strategies (see Table 1 in the Development Plan Scheme).
AS.18.22	Major employers need to talk early about their plans for future investment / expansion to get houses near to workplaces.	Noted. The development of the structure plan is being undertaken in a way that allows representatives of the business community to provide their views on various possible strategies for development (see Table 1 and Appendix 2 in the Development Plan Scheme). In this way we hope to capture their preferences on the location of future housing and employment development, in order to recommend a preferred strategy. SPP 2 suggests that key sites for business and industry uses should be highly accessible - this could mean ensuring that they are closely related to housing, but also that they are highly accessible by public transport.
AS.18.23	Developers should be forced to build smaller houses according to the demographic trends, but also provide 3 and 4 bedroom houses to provide an "aspirational ladder"	Noted. A variety of housing tenures shall be built throughout the plan period.
AS.18.24	A balance of social and low cost houses of up to 60% is required in any development over 4 houses.	This is a local plan issues.
AS.18.25	The shocking Elrick development which is an abomination should not be repeated anywhere in the City or Shire area.	Noted.
AS.18.26	We should be more innovative in design, incorporating sustainable technologies to reduce lifetime costs and other impacts.	Noted.
AS.18.27	Developers should be forced to construct to a higher standard and both inspect and enforce these standards	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.18.28	We should be less prescriptive in design, encourage local variation and take account of landscape	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.18.29	Smaller centres in Aberdeenshire require to have master plans prepared for them	Noted. A structure plan is the strategic tier of a development plan and provides the framework for the long term development of a region, rather than detailed policies for the development of particular locations; these detailed policies are provided by a local plan. As such, this is a local plan issue rather than a structure plan issue.

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AS.18.30	Out of town centre developments encourage greater car use but can support existing town centres if appropriate in size and type of operation. They encourage competition. We have to be clear about what is over-provision and inappropriate in size and type of operation. Policies should encourage economic growth, but not displacement. Retail Impact assessments must be more smartly assessed.	SPP 8 provides a sequential approach for selecting sites for retail uses. This approach provides for development at out-of-centre locations if (among other things) other sites, such as town centre locations, are unsuitable or unavailable. Detailed policies for use in assessing individual applications (and any associated Retail Impact Assessments) should be provided in a local plan and/or in supplementary planning guidance, rather than in a Structure Plan.
AS.18.31	While I agree with the statements in the report more land requires to be set aside for industrial uses rather than retail or service industries, as these are predominantly displacement jobs, producing little for the local economy.	Noted. The question of the scale of future development we should seek to accommodate is one that needs to be addressed by the plan. If we are to ensure that some land is set aside for a particular sector of the economy, we must make sure that we do not overlook the needs of other sectors important for the regional and national economy. Any shortage in the supply of land for industrial uses could perhaps be overcome by a release of large amounts of employment land, which would have the effect of lowering land prices. Retail Impact Assessments can be used to assess the effects that individual retail proposals would have on existing centres; such assessments allow us to make an informed judgement on the likely economic impact - which may be positive or negative - on a case-by-case basis.
AS.18.32	Tourism must be allowed to flourish with less constraint. This is a growing industry and this requires to be recognised.	We recognise the economic importance of tourism to the north east and therefore believe that it is essential that future tourism related development maintains and safeguards the mountains, lochs, coastline, wildlife, architecture and scenery in order to ensure that they remain major quality attractions for tourists.
AS.18.33	Jobs in rural areas that sustain the environment must be maintained and we should not put up barriers to the new jobs which can be created in rural areas.	Noted. The structure plan will address the land-use implications of providing for rural economic and social development, from a strategic perspective - that is, from the point of view of the long term development of the region as a whole. The choice of a preferred strategy may have implications for rural development; any such implications will be identified and considered in the technical appraisal of possible strategies (see Table 1 in the Development Plan Scheme).
AS.18.34	New sports activities require to be supported in the outer countryside.	Noted.
AS.18.35	We need to be more innovative in our transport policies	The Local and Regional Transport Strategies set the transport policies for the region, albeit in view of land-use planning goals and requirements. We need to work in partnership with bodies such as NESTRANS (the Regional Transport Partnership) to create effective solutions to issues that are significant for both transport and land-use planning.

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AS.18.36	We need to be more positive in allowing small businesses in rural areas at place of work, requiring less constraining policies on the development of redundant buildings.	The structure plan could provide a strategic response to the issue of reducing the need to travel - for example, by proposing a pattern of development across the region that would enable many people to live and work in the same locality. Policies relating to the re-development of redundant buildings, which could help implement such a strategy, would be provided by a local plan. The re-development of redundant buildings in urban areas, for a mix of uses, can also help reduce the need to travel.
AS.18.37	Local retail outlets need to be supported with less out of town retailing.	Noted. It is important for retail developments to be highly accessible by a range of means of transport and SPP 17 identifies walking as the most sustainable mode. In addition, the sequential approach outlined in SPP 8 suggests that development on sites within existing centres should be preferred over out-of-centre sites. There is thus already considerable support for this view, within national planning policy statements.
AS.18.38	Car parking should be more restrictive in new developments.	Noted. Maximum parking standards can help to encourage the use of alternative modes of transport to the private car. Other steps, to improve access to alternative modes, may need to be taken and it would be for Local and Regional Transport Strategies to suggest appropriate solutions.
AS.18.39	Planning constraints on recycling points in the community should be reduced	Noted.
AS.18.40	While I agree with your comment there is not much of a problem with sewage plants outside communities in stand alone clusters so long as it fits with landscape and is associated with a community and local services	Noted.
AS.18.41	Larger developers require to give a greater contribution to local infrastructure. Masterplanning is advocated to ensure that the first developer does not have to do it all	Noted. Cognisance is taken of National Planning Policy which stipulates that developer contributions must serve a planning purpose and should be related and proportionate to the proposed development.
AS.18.42	Retail developments should be required to provide on site recycling facilities.	This is not, in-itself, an issue for a structure plan to address. Detailed policies on the management of development should be part of a local plan and/or supplementary planning guidance. Encouraging the re-use of resources could be an aim for the structure plan, however this would then need to be interpreted in view of the purpose of providing a strategy for the land use development of the region, for the next 25 years.
AS.18.43	Light pollution should be lessened by requiring more demanding standards in developments.	Noted, but this is not a structure plan matter.

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AS.18.44	A clearer long term vision is required about water and sewerage needs than just for the lifetime of the structure plan.	Noted. This longer term vision will be provided by the 5 yearly review of the plan over its 25 year period.
AS.18.45	No development should take place on land that has a 1 in 200 chance of flooding	Noted.
AS.18.46	I strongly disagree with land based wind power as it is inefficient, represents industrialisation of the landscape and there are other, better technologies available.	Noted. It is unlikely that the structure plan will contain a renewables policy, unless developments of national importance are identified in the National Planning Framework 2 and require to be reflected in the structure plan. Scottish Planning Policy 6: Renewable Developments allows the planning authority to decide which plan (structure or local) should contain a policy on renewables. It is likely that the local plans will be a more appropriate mechanism for delivering the renewables objectives in SPP6, as it will be able to go into more detail and avoid duplication of the same policies.
AS.18.47	Not extending the runway at Aberdeen and no AWPR could be a good thing for climate change.	Noted, but the runway extension at Aberdeen Airport is already going through the planning process, and the AWPR has still to go through the public inquiry, which will examine all the arguments for and against the AWPR. The structure plan at present can only reflect on the outcomes of both proposals.
AS.18.48	Current planning recommendations and decisions, particularly that at Glen'O'Dee, make the statement on heritage "empty words"	Planning recommendations and decisions cannot be commented upon here. However, without policies securing the long term future of the area's cultural, natural and built heritage, these sites would disappear and nothing would be done to enhance them.
AS.18.49	The current structure plan is a joke with house prices in rural areas going through the roof due to insufficient zoned land. An enormous supply of zoned land is required so that sufficient quantities of appropriate housing right across the area can be built.	Noted. This supports a high level of housebuilding across the area.
AS.18.50	Control of house type and size, and intervention in the housing market, are required to reduce land prices	Noted. These are issues for the local plans
AS.18.51	We need to think about how houses and businesses fit into the landscape and how communities develop. Clusters of houses within 'spitting distance' of small communities with some facilities like a shop, PO, pub for example should be encouraged.	Noted. SPP 15 highlights the importance of reducing the need to travel through land use planning. Densities of development should reflect the proximity of jobs and services with the aim of reducing the need to travel.
AS.18.52	A social mix of residents should be encouraged through the planning system.	Noted. PAN 74 attaches high importance to the development of mixed, sustainable communities with a range of housing types and tenures.

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AS.18.53	We need to think about sustaining communities, schools and facilities	Noted. The issue of creating and maintaining critical masses of development in order to ensure that settlements are sustainable is an important issue that the plan will seek to address.
AS.18.54	If the AWPR is built Aberdeen will expand west to it and Aberdeenshire's role will be to act as the hinterland to the city.	Noted. This is taken as support for expansion of Aberdeen City.
AS.18.55	An energy from waste plant should be built at Inverurie near the paper factory	Noted.
AS.18.56	Landfill is not an option for the future, greater emphasis has to be placed on recycling and composting facilities	Noted. Depending on the strategic importance of the development, waste management facilities identified in the existing Area Waste Plan will be identified in local plans. The draft Scottish Planning Policy 10: Planning and Waste is currently under review and will inform the structure plan response when published.

Mr Tom Masson

AS.16.1	Object to any wholesale expansion of Westhill.	Noted.
AS.16.2	Westhill has lost its original apparent charm due to the rapid and apparently unstoppable expansion of the industrial park.	Noted.
AS.16.3	A new purpose built town similar to Westhill should be developed.	This proposal supports the the new settlements strategy.
AS.7.1	Westhill should not expand until thorough research has identified what factors and facilities constitute an ideal size for a town in Aberdeenshire	Westhill is currently the subject of a Settlement Capacity Study, which will identify the most sustainable locations for new development in and around the settlement.
AS.7.2	The rapid expansion of Westhill over the last few years has reduced the attractiveness of the settlement and affected the community spirit.	Noted. The impact on quality of life from overdevelopment is recognised. Westhill is one of several settlements that are subject to a settlement capacity study. It is the intension of these studies to identify the sustainable locations of new development in and on the edge of town, and to identify where the town itself could be improved, (e.g. improving access routes).

Mr Euan Munro

AS.24.1	We need to include or consider the protection of rural service centres (country villages) from over development. This is of particular relevance to Kirkton of Skene and other villages threatened by neighbouring towns.	Noted
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Mr Gordon Philip

AS.1.2	Growth has outstripped provision of infrastructure, particularly recreation and outdoor sports. More space is required for provision of healthy outdoor sports activities.	Noted. Both Aberdeen City and Aberdeenshire Councils have updated their sports strategies, and these will be used to identify needs for sports facilities in local plans.
AS.1.3	Concentration of housing in the main towns creates concrete jungles	Noted.
AS.1.4	Concentration of housing in the larger settlements does not help keep the countryside alive. Where there are existing communities the plan should encourage some growth, especially as all main services are already available.	The issue of creating and maintaining critical masses of development in order to ensure that rural settlements are self sufficient and able to maintain their function in the local economy is an important planning issue and is recognised within SPP15. The structure plan will identify the most appropriate locations for all types of new development through a preferred strategic option, which will arise after a series of consultations. The comment supports a strategy of reserving land elsewhere to meet local and rural needs.

Mr Simon Power

AS.8.2	The impacts of the predicted rise in fossil fuel prices over the next few years should be taken into consideration. We should take into consideration the issue of energy depletion and energy descent.	It is noted that the price and supply of energy, as well impact on the climate are potential issues.
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Mr Simon Richards

AS.12.1	A fourth Bullet should be added to achieve the vision "relocalise the economy so that communities become increasingly self sufficient in their daily needs" so as to reduce the need to travel, reduce carbon emissions and help build community spirit.	Noted.
AS.12.2	Services and facilities in local communities must be re-introduced so that everyone can get their daily necessities within walking distance.	This is an issue of critical mass which is addressed in the draft vision. The structure plan is unable to secure the reintroduction of services and facilities in the manner suggested.
AS.12.3	Housing should have an independent means of heating, such as a fireplace, Consideration should be given to constructing Combined Heat and power plants	Noted. These are detailed matters more appropriately considered in the context of local plans
AS.12.4	Walking and Cycling should be prioritised and public parking restricted to discourage driving	These are principles embodied in SPP17 "Planning for Transport, which the Structure Plan will have to have cognisance of.
AS.12.5	Local shopping should be re-introduced. Out of town shopping should be severely curtailed. City centres should be regenerated with small, locally owned shops.	These are all encouraged within SPP8 "Planning for Town Centres" through the application of a sequential approach to retail site selection. The planning system has no control over the ownership of small local shops.

AS.12.6	There is a need to relocalise communities to make them more self reliant	Noted.
AS.12.7	There is a need to encourage local sources of water and energy to be developed including Community wind farms, Combined heat and power schemes etc.	These are issues which may be better adressed at a scale below the structure plan, such as at a local plan or masterplan level.
AS.12.8	The plan should not fight climate change but work with the consequences of it, such as developing on higher ground rather than trying to hold the sea back	Noted.
AS.12.9	Isolated rural developments should be discouraged and existing rural communities should be encouraged to grow to a level where they are viable together with appropriate facilities and services. Growth in existing towns and cities should be halted as they are unsustainable.	The comment supports a dispersal strategy. Such a strategy has been dismissed for a number of reasons including issues of marketability and the ability to create sufficient "critical mass" to provide the major infrastructure that may be required.
AS.12.10	Road transport by private car should be discouraged.	Noted. Modal shift can be encouraged by integrating land uses and providing sufficient critical mass in locations which can be served by public transport.
AS.12.11	Previous rail infrastructure should be reinstated to give a viable alernative to road transport.	Noted. Reinstatement of rail would require considerable investment and would not be able to substitute fully for road based modes. Two of the draft strategies being proposed suggest augmentation or reinstatement of rail transport links.

46 Shirland Mews

Ms Sophia Tennant

AS.32.1	No more development should be allocated in Alford (especially to the east), as any further development will start the adversely impact on the landscape and visual setting of the area due to the siting of Alford in a dip in the landscape. The countryside is one of Alford's principle ameneities for local residents and visitors, and preserving this area of countryside has economic value for the trades people of Alford.	Noted.
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ACSEF

Ms Rita Stephen

AS.78.1 In response to Question 1 of the Issues Report (regarding the draft vision), we submit a copy of the latest version of the new ACSEF vision for the region. We would like the new ACSEF vision to be considered, when amendments are made to the draft vision of the next structure plan.

The new ACSEF vision for the region will be taken into account. We note that there are some similarities and some differences between this vision and the draft vision for the next structure plan. With regard to the similarities, we note that the themes of sustainability and of the quality of the local environment are present in the ACSEF vision, as they are in the draft vision for the plan. In addition, the idea of providing for a range of opportunities in lifestyle reflects the sentiment of providing an image of opportunity and inventiveness for the region, within the ACSEF vision. There is also similarity between the focus on being recognised for technological and intellectual excellence and on attracting organisations operating in high value, quality, niche markets. With regard to the differences however, we note that there is a focus on providing a resilient and efficient economy in the ACSEF vision that is not immediately obvious in the draft vision for the structure plan. The European dimension of the two visions differs, with the draft vision focusing on Europe as a whole, whilst the ACSEF vision seeks comparison only with Northern Europe. In addition, whilst the ACSEF vision makes explicit reference to the oil and gas industry along with the tourism industry, no such reference is made to these industries in the draft vision for the structure plan.

Architecture + Design Scotland

Ms Angela Williams

AS.67.1	The structure plan is a vital instrument for Aberdeen City and Aberdeenshire Council to achieve an exciting, modern and environmentally sustainable European city region.	Noted..
AS.67.2	The Vision should stress that the plan's policy is not only to identify locations where it's aims may be achieved, but also the quality of design, which will be necessary to bring these about.	Noted. This view suggests that the plan should consider the issue of the design of new developments and that, furthermore, this issue should be made explicit in the vision, due to its importance.
AS.67.3	We are pleased that of the 13 key issues identified, design is included, and as a cross-cutting issue, design and change management underpin the search for excellence in the majority of the issues highlighted. It would be useful to develop the linkages between the issues during the next phase of work.	Noted
AS.67.4	We held a discussion on the Aging Population, on behalf of the Scottish Executive, which a record of it is available on A+DS's website.	Noted
AS.67.5	We are aware of the importance of infrastructure in underpinning many of the ambitions for the structure plan, and its impact on the local environment, which calls for thoughtful early design.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.

AS.67.6	A key thread to A+DS's work relates to placemaking, and ensuring that the tools and skills are available to deliver long lasting places of quality, and would support the strengthening of the emphasis on Design as being intrinsic to achieving the aims of the structure plan. Design should be embedded at all levels, from strategic to local level, such as from the scale of new settlements, urban expansion areas and major infrastructure projects, down to public realm projects and individual buildings.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.67.7	There will inevitably be considerable development pressure upon the land adjacent to the AWPR and its interchanges, and on the land between the route and the city. Firm quality-led planning guidelines will be necessary to avoid rash edge-of-city development and 'new settlement' pressure. However, in helping to shape the NE in economic terms, the AWPR could also provide an exemplar of the ways in which infrastructure can lead to carefully thought through regional spatial planning.	It is the policy of both authorities to avoid the creation of a development corridor along the AWPR. We would agree that a quality led approach is vital to achieve "quality of life" objectives and that the AWPR will have an important influence on the spatial strategy ultimately arrived at.
AS.67.8	We are pleased to see that the AWPR is identified as having a key role in determining the way in which the area is developed, and encourage both councils not to underestimate the impact it will have.	Noted
AS.67.9	A+DS would be pleased to contribute to the technical assessments of spatial options.	Noted

Architecture, Planning and Development Consultants

Mr Ian Downie

AS.11.1	The plan requires to provide a housing land supply for a 30 year period	The new structure plan will influence where and how much development will take place over the next 25 years. We have realised the importance of having a longer term strategic vision for the development of land in the area and we are consequently carrying out a series of consultations on strategic options in order to identify the most favourable option.
AS.11.2	65000 to 70000 houses will be required in the AHMA over the next 30 years. 37500 of these require to be allocated in the first decade of the plan to ensure continuity	It is unclear how these figures have been arrived at. The quoted figures suggest a 30-40% increase in completions in the AHMA.
AS.11.3	700 greenfield allocations per annum are required in Aberdeen City to sustain current population levels	It is unclear how the figure has been arrived at. It is assumed to be in addition to an unspecified level of brownfield development.
AS.11.4	The option of focussing new greenfield development in the city while starving the Shire part of the AHMA is not an option consistent with the political aspirations of either authority and should be resisted at all costs	Political aspirations will be determined by the politicians themselves who are required to agree the plan.
AS.11.5	The scale of the task imposes limitations on the strategic options available. Artificial constraints such as the 15 house limitation to secondary settlements, or allocating the vast bulk of development to a limited number of settlements along the main transport corridors will not address the fundamental supply issue.	These statements support a dispersal strategy. It argues against a strategy based on development along the transport corridors.

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AS.11.6	To achieve the level of supply required consideration will have to be given to substantial greenfield development within the City Boundary, possibly along the AWPR and in all settlements within an extended AHMA. A far more sophisticated approach will be required than that seen in NEST to avoid marketability constraints and areas in the RHMA where there is virtually no effective housing land supply.	These statements support a dispersal strategy, and a strategy which promotes development on the periphery of the City. It promotes the AWPR as a development corridor.
AS.11.7	The plan will have to address how the traffic implications of the allocations strategy can be accommodated by existing and proposed roads infrastructure. Previous concentration of development has exacerbated the problem	Traffic growth is a key issue for the plan to address. There are clear alternatives between depending on existing road infrastructure to accommodate traffic growth, or creating additional capacity. Creation of additional capacity may only be possible with large quantities of development. Technical evaluation with transport and infrastructure providers will address this particular question.

Area Manager Kincardine and Mearns

Mr William Munro

AS.76.1	The Aberdeenshire Community Safety Partnership have recently observed that communities that have seen a rapid expansion (e.g. Westhill, Ellon, Inverurie and Portlethen) witness high levels of anti-social behaviour. One of the reasons for this could be that new community facilities are not provided alongside and in proportion to new housing.	The structure plan has taken cognisance of the fact that in order to provide sufficient infrastructure and services it is necessary to allocate the critical mass of development to ensure these are delivered.
AS.76.2	If community safety and antisocial behaviour was the only consideration for the next plan, the high levels of anti-social behaviour witnessed by recently expanded communities suggests that continuing the expansion of these towns is not the best strategy. Obviously, this is not the only consideration but it is hoped that the observation will be of interest.	Noted. The need to create complete communities, rather than expansion of existing communities may address this issue.

Balfuig Castle

Mr Mark Tennant

AS.30.1	No development of any kind should take place enlarging Alford on either side of the main road (the A944), to the east or the south of the settlement, and that the new development at Wellheads Farm should be the final extension of the town. The setting of Balfuig Castle may also be adversely affected by further development.	Noted
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Banchory Community Council

Mr Keith White

AS.6.1	The Issues Report has not been widely discussed by Banchory Community Council, due to time constraints. We do not have any comment on the issues at this time.	Noted.
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Bancon Homes

Mr Harry McNab

AS.55.1	The vision appears to promote a nil growth strategy, rather than promoting growth.	This view supports a re-wording of the vision to promote the economic growth of the region.
AS.55.2	The vision appears to put all its eggs in one basket to address the issue of the projected decline in the oil industry by focusing on renewable energy and not considering alternatives such as services, tourism, new knowledge based industries and develop our reputation as an excellent food producer. The options for each scenario need to be developed- with the consequences for business and housing land requirements identified.	This comment suggests that the vision should be re-worded to focus on the growth of other sectors of the economy, aside from the energy sector.
AS.55.3	Are we going to accept the inevitability of population decline, or should we plan to attract new industry and consequently population into the area and if so, what are the consequences for business and housing land release?	This is a fundamental question for the plan to address, and is contained within considerations of the scale of development to be provided.
AS.55.4	The existing population is rapidly ageing, and we are becoming reliant on a smaller and smaller workforce. Is it time to be very pro-active in enticing young dynamic people into our region? If so, this has clear implication for environmental and heritage policy, as well as business land and residential land locational preferences.	Noted. The structure plan can only provide the land for development and cannot solely entice young dynamic people into our region. This comment supports a growth scenario for development. This may help to accommodate population and economic growth.
AS.55.5	Climate change and sustainability should be a major informant of the settlement strategy, yet it hardly registers as a feature of the current vision.	Impact on sustainability is a key component of the technical evaluations of the strategic options and has already been used in the "filtering" of the options used for consultation. This view supports a re-wording of the vision to strengthen references to climate change and sustainability.
AS.55.6	The vision should be more inspiring and could read.... In 30 years time, the plan envisages the region's economy will have seen sustainable growth at a rate above the national average, and will be encouraged to continue to grow at a rate of at least 2% above that of the UK. This sustainable growth will have been achieved while maintaining the highest environment and 'quality of life' for which the region is acclaimed. These strategies could be achieved by being 'open for business', welcoming inward investment across the full range of business enterprise and having the land and infrastructure available and also encourage inward migration by providing the necessary range of housing, while also providing social infrastructure.	The alternative vision will be considered. The land-use specific element of the alternative is of interest, however the structure plan is not an economic development strategy and will not supersede other documents of this type, for the region (e.g. those produced by Aberdeen City and Shire Economic Forum and by both of the Councils).
AS.55.7	The vision states that the region will be 'exciting and modern' and this implies change- yet no dramatic change appears to be envisaged.	Noted.
AS.55.8	The region needs to be welcoming to all business and not just renewable energy and this implies an availability of business land and housing options on a much wider scale than is currently on offer.	Noted. This view suggests that the vision should be re-worded so as to focus on other sectors of the economy, in addition to the renewable energy sector.
AS.55.9	At the moment Aberdeen is pricing itself out of the global market for inward investment, and does not appear willing to intervene to change the supply side of the land availability equation.	Noted. The regional supply of marketable employment land for the next 25 years will be determined by the plan. SPP2 makes it clear that development plans should provide a sufficient quantity of marketable employment land to meet business requirements and the requirements for the growth of indigenous firms. To realise the draft vision, the plan may also have to provide for additional inward investment and as such, the intent to prevent future problems with supply is clear.

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AS.55.10	The focus on encouraging new development to use land in a sustainable way as set out in the vision is admirable, but avoids the primary issue of the scale of growth which is to be encouraged.	The support for encouraging new development to be sustainable is noted. The question of the scale of development envisaged for the next 25 years is being pursued through engagement with communities and stakeholders on possible strategic options (see Table 1 in the Development Plan Scheme), rather than through consultation on the issues.
AS.55.11	The vision implies that development is to be potentially restricted by the 'wants' of the established community. This statement is likely to discourage inward investment.	Noted. This comment suggests that the vision should be re-worded so as to positively encourage inward investment over the next 25 years.
AS.55.12	In considering 'the needs of our communities' there should to be a focus on assisting young people and young families in particular.	Noted.
AS.55.13	It is felt that the commitment to 'make the hard choices' needs to be much more central to the plan, if the failures of the past are to be avoided. Delivery is the key measure of success, and determining whether the hard choices have truly been made is central to that evaluation.	Noted. It will be important that this element of the vision is reflected in the strategy and in the aims and objectives of the plan.
AS.55.14	In accordance with the National Planning Strategy [Framework], the population needs to be grown rather than merely 'maintained'. Inward migration of young vibrant families is key to this goal and requires to be dynamically promoted and encouraged. This is also an essential component of generating the 'critical mass' required for the delivery of some of the projects which the draft plan envisages.	Noted. This is taken as being support for a medium or high growth scenario
AS.55.15	The ageing population needs to be dramatically reinforced by encouraging both in-migration from abroad, and in particular, major in-migration of young families, from outwith the Region. This implies the release of substantially more housing land than in past, as well as the provision of a much better locational choice in terms of housing, attention to educational provision and a range of 'quality of life' issues.	This comment supports the growth strategies. Issues such as choice and quality of life are key elements of the draft vision of the plan.
AS.55.16	Regeneration is only an element of strategic policy if it is planned to either generate a significant number of new housing units through such regeneration which may be a way of achieving an increase in the City's affordable housing stock or divert significant public sector funds into regeneration.	Noted. The strategic implications of regeneration are significantly wider than just its impact on affordable housing and diversion of funding. Regeneration can make a significant contribution to achieving the aims of the vision for the plan.
AS.55.17	There needs to be growth in the towns and villages as well as the major towns. Maintaining attractive smaller communities would be an important factor in attracting inward migration, and will contribute to several wider goals.	Noted. This supports the concept of local development opportunity for local need, but goes further to promote a dispersed form of development to serve part of the needs of the City Region. The major investments that would be required to support such development would likely require significant scale of development to be directed to these locations, impacting on their attractiveness and quality of life that they provide. A strategy of dispersal was considered in the initial scoping of possible strategic options and was dismissed for this, and other reasons.
AS.55.18	Areas in the green belt close to the City need particularly close scrutiny to assess their contribution to the green belt and potential for land release.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.

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AS.55.19	A review of the green belt needs to consider how a sustainable development strategy can be delivered while maintaining a high quality environment.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AS.55.20	The plan needs to honestly recognise the current deficiencies in supply which are fuelling land values and making houses more and more un-affordable. If the affordability issue is to be addressed, then much more headroom flexibility needs to be built into the supply outlined in the plan.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure and service providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly. The outcome may affect land values and the affordability of houses.
AS.55.21	There is a need for locational choice and a range of house types and sizes to feature in policy.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. The plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community.
AS.55.22	Consideration needs to be given to the sustainability implications of design, as the construction industry moves towards more off-site construction and the more regular integration of standardised components. The import of standard plans in this process should be discussed with the industry.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.55.23	If industry is to be attracted the region, then a substantial housing land supply is equally essential.	Noted.
AS.55.24	The strategy needs to specify that local plan policy should ensure that land is identified specifically for retail growth- to prevent erosion of business land.	Noted. The specific identification of land for retail use will be an issue for local plans
AS.55.25	The plan requires to promote economic growth in all sectors of the economy, rather than being more focused on a single (renewable energy) strategy.	Noted. This view suggests that the vision should be re-worded to support the growth of other sectors of the economy, in addition to those associated with renewable energy.
AS.55.26	If industry is to be attracted to the region, then a substantial housing land supply is equally essential.	Noted.
AS.55.27	Encouraging development along the 'Cross-rail' route and releasing more housing land in Aberdeen City will help promote the goal of getting more homes closely related to the main centres of employment.	Noted. This is taken as support for the "existing transport corridor" strategy.
AS.55.28	The most significant transport issue should be the extension of the airport runway, to make Aberdeen a truly international airport.	This is a project identified in the finalised Regional Transport Strategy currently before Scottish Ministers.

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AS.55.29	The connectivity of the airport to the railway also needs to be looked at as a strategic project.	This is a project identified in the finalised Regional Transport Strategy currently before Scottish Ministers.
AS.55.30	Strategic options should be strenuously tested with utility providers before they are finalised.	Agreed. A process of technical evaluation is underway
AS.55.31	Consideration requires to be given to locating new infrastructure capacity where people wish to live as well as where supply can be most cost-effectively delivered.	Noted. The pattern of development that the structure plan will prescribe has taken cognisance of the fact that in order to provide sufficient infrastructure and services it is necessary to allocate a critical mass of development to make these provisions feasible.
AS.55.34	Development allocations require to have regard to the 'critical mass' required to overcome infrastructure constraints.	Noted. The pattern of development that the structure plan will prescribe has taken cognisance of the fact that in order to provide sufficient infrastructure and services it is necessary to allocate a critical mass of development to make these provisions feasible.
AS.55.35	Measures to reduce climate change would be more effective if legislated for on a national agenda through Scottish Building Regulations or SPP6 rather than local policies which produce intra-regional disparities and can discourage inward investment.	Noted.
AS.55.36	We agree that protecting the area's most significant heritage assets is a key component of the strategy geared to attracting inward investment and creating an attractive place to live.	Noted.
AS.55.37	Bancon support the principle of developing a highly sustainable development strategy based on locating development within Aberdeen and on the principle transport corridors to the City.	Noted. This is taken as support for the "Aberdeen City", "edge of City Communities" and "existing transport corridor" strategies
AS.55.38	Development along the proposed 'cross-rail corridor' is particularly welcomed with development from Insh/Inverurie through to Stonehaven/ Laurencekirk.	This is taken as support for the "existing transport corridor" strategy.
AS.55.39	The majority of development should be located in the transport corridors in Aberdeenshire, as the recent City LP- GSNP suggests that for environmental reasons, the City currently has a more limited capacity to absorb growth	Noted. This is taken as support for the "edge of city communities" and "existing transport corridor" strategies, with the majority of new development occurring in Aberdeenshire.
AS.55.40	We do not support a new transport corridor from the City to Peterhead, as this runs contrary to market locational preferences, would be very costly, and difficult to deliver within the plan period.	Noted. The caveats identified will be tested through the technical assessment.
AS.55.41	The opportunity for a new settlement has passed and we should be looking at more sustainable options.	Noted. This is taken as dismissal of the new settlement strategy.
AS.55.42	Delivering a new settlement will be very costly, would therefore absorb a lot of resources and would inevitably be a backloaded option, which could only be delivered towards the end of the plan period.	Noted.

Barton Willmore

Mr Andrew Fleming

AS.61.1	Wish to be informed of the Councils consideration of responses on the issues raised and at successive stages of public consultation.	Noted.
AS.61.2	We wish to continue with dialogue as the plan preparation progresses, and to be kept informed of the timescales for progressing the new plan forward.	Noted.
AS.61.3	Will need to ensure there is enough critical mass to sustain the desired position that the City and Shire want to achieve by 2030. This will require councils working closely with service/infrastructure providers to ensure the desired scenario can actually be achieved and within the timescale desired.	Noted. Infrastructure and service providers are being actively engaged in the preparation of the plan, to ensure that it is deliverable.
AS.61.4	We acknowledge and support the themes incorporated within the draft vision. We also acknowledge the reference to encouraging new development and to helping all the industries that support the vision to be successful.	Noted.
AS.61.5	Increasingly the development industry is being expected to deliver, in full, services and facilities to communities where new housing is provided. As the cost implications are not always appreciated fully by council, it is suggested that after the words "...communities wants," in para 2, add "and which are required to support the growth strategy...".	Noted.
AS.61.6	We concur with the approach taken in the issues report not place any of the issues in terms of importance, as they are all important and play their part in helping to achieve the draft vision. Also, we do not believe any key issues have been omitted.	Noted.
AS.61.7	With regards to the 13 issues, the councils will need to focus on sustaining the population, achieving the right balance in age structure, and planning for where this population growth is to be accommodated. Therefore initial focus should be on a) population, b) changes in the population, d) balancing needs, f) housing, i) economic potential, and j) transport and infrastructure. The other issues should be considered in tandem.	The comment, and the relative priority given to issues is noted.
AS.61.8	It is important to tackle population decline, including from the City to the Shire, particularly young families, in order to realise the draft vision of the area becoming a sustainable city region. Should not be pessimistic with land supply for housing, in order to stimulate investment and development that will reverse population decline.	Noted. This is taken as support for a strategy which would promote variety of house types being promoted in Aberdeen City, and for a growth scenario.

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AS.61.9	Increasing elderly and fewer children and adult of working age is particularly acute in the City, and if the population continues to fall, this will have knock on effects for existing services and facilities and, in turn, the economy. This matter must be addressed by planning for more development that caters for sustainable community growth and a range of age groups.	Noted. The next plan will take into consideration the importance of maintaining critical masses of development in order to ensure that settlements are self sufficient and able to maintain their function in the local economy. The plan will also take into consideration guidance set out in SPP3 which states that more diverse, attractive, mixed residential communities in terms of tenure and land use should be encouraged. It will aim to meet the needs of all in the community and all segments of the market, by ensuring that the appropriate policies are in place to provide the range of house types to meet the needs of all in the community.
AS.61.10	Regeneration of areas has a tendency to deliver accommodation of a particular type - flats, which appeal to a limited sector of the housing market. Regeneration has to be balanced with ensuring that the necessary range and quality of housing (including upper end of the market) is accommodated. Furthermore, it is likely that the level of brownfield land provision will decline and should not be relied upon to deliver substantial elements of housing requirements.	Noted. A further brownfield urban capacity study will be carried out by the councils to establish the scale of land available for housing.
AS.61.11	A balanced approach to development in the city, towns and villages is desirable to achieve the stated draft vision. Growth guided to Aberdeen and its immediate area within the AWPR would provide an opportunity to achieve a sustainable, high quality environment.	Noted. This is taken as support for substantial development to be directed to Aberdeen City.
AS.61.12	Should take account of the revised key objectives of green belts, as set out in Scottish Planning Policy 21: Green Belts, and reassess the role of the green belt and the areas that it covers to ensure that development is allowed in appropriate places to a sustainable pattern.	The Aberdeen Green Belt will have to be reviewed in light of the revised objectives in SPP21. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt has yet to be undertaken.
AS.61.13	Councils should look for a strategy for growth. The predominance of flatted development in the City of recent, emphasises the limited choice of locations and a limited range of accommodation. Land for family housing is needed, particularly in Aberdeen, including land for upper market housing.	Noted. We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. The plan will also take into consideration guidance set out in SPP3 which states that more diverse, attractive, mixed residential communities in terms of tenure and land use should be encouraged.
AS.61.14	New developments that have taken account of and applied best practice design principles provide a positive contribution to an area, and we recommend early involvement of urban designers/master planners in the process to ensure proper master planning is applied in delivering quality environments.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.61.15	Fundamental to the development of a competitive City region, which would aid diversification from oil and gas, which the structure plan can assist in are infrastructure, quality of environment and the provision of adequate and suitable land.	Agreed.

AS.61.16	The provision of sufficient employment land close to transport corridors will assist economic objectives providing opportunities for indigenous companies and inward investors alike.	Noted. It will be important to ensure that new development does not limit the economic competitiveness of the region by adversely affecting the strategic road network.
AS.61.17	Integration between land use and transport planning is vital if sustainable development is to be achieved. Transport infrastructure must be seen as a significant consideration as part of any spatial strategy adopted for the structure plan.	Noted. We agree that transport infrastructure must be seen as a significant consideration in the determination of a preferred spatial strategy.
AS.61.18	The AWPR is an integral and key part of an integrated transport strategy, and the success of other inter-modal transport measures, such as park and ride, bus and road-rail strategies is clearly dependant upon the provision of the AWPR.	Noted. The development of the structure plan is being based on the assumption that the AWPR will be approved and constructed.
AS.61.19	Aberdeen and its immediate area has the advantage of a critical mass of existing services/infrastructure, which make it easier to support new development or enhance existing provision to meet demand.	Noted.
AS.61.20	Growth guided to Aberdeen and its surrounding area would provide an opportunity to achieve a high quality environment and would assist in protecting the environment in the smaller settlements. This would take account of available environmental and infrastructure capacity and market demand and support the Councils' proposed transport infrastructure.	Noted. This is taken as support for a strategy that promotes the majority of the development in and around Aberdeen City
AS.61.21	Would wish to participate in ongoing consultation on the spatial strategy.	Noted. Barton Wilmore were invited to participate in the "strategic options" seminars. The next opportunity for consultation is in the context of a draft plan.

British Wind Energy Association

Ms Abigail Dodds

AS.51.1	The development plan should briefly outline the different renewable energy technologies, and equally encourage and promote all forms of renewable energy.	This issue is promoted through the vision for the plan, and will be a key concern for it.
AS.51.2	The plan should present a positive, objective and robust approach to renewable energy for the wider and local benefit, rather than a restrictive policy in response to renewable energy objectors.	Noted.
AS.51.3	The criteria to be considered for the development plan renewable energy policy should be those criteria set out in SPP6 and will include consideration of the effects of proposed development on the landscape, natural and historic designated sites and areas, telecommunications, residential amenity and the wider environmental, social and economic benefits of the scheme	Noted. These are detailed matters more appropriately considered in Local Plans.
AS.51.4	Policy must emphasise the importance of fully recognising the wider economic, social and environmental benefits that can arise through renewable energy developments.	Noted.

AS.51.5	In the case of wind energy proposals of over 20 MW, the plan should identify the broad areas to which to guide wind farm developments, although it is important that this does not give rise to a sequential approach.	The development types/land uses to be included in the new structure plan has yet to be determined, and the map or key diagram to accompany the plan may not be detailed enough to allow broad areas of search for wind farm developments to be identified in a meaningful way. It may be more appropriate to present this information in the next local plan.
AS.51.6	All wind energy proposals should be assessed on a case by case basis whether within or outwith the preferred areas, unless they have specifically been defined in the plan as being inappropriate for wind energy developments.	In the spirit of the proposed changes highlighted in the 2006 Planning etc (Scotland) Act, the new structure plan will be prepared in the form of a strategic development plan and will focus principally on setting out the spatial strategy and where strategic allocations of new development will be located.
AS.51.7	There should be a policy for the mandatory requirement of onsite renewables for all new buildings and renovations to provide electricity for at least 15% of the building's needs, in accordance with SPP6	Noted. This is not an issue appropriate for consideration in the structure plan.

Broomhills Farm

Mr Harry Milne

AS.31.1	The village boundary of Sandhaven should be extended to include the whole field adjacent to St Magnus Road.	This is a local issue and is more appropriately considered in the context of the local plan.
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Bruce and Partners

Mr Simon Harrison

AS.21.1	Bruce and Partners agree with the reasons set out in the development plan scheme for reviewing the extant NEST structure plan although we do not agree that there is any justifiable case to delay the preparation and introduction of up to date strategic guidance until after 2011	We are not delaying the preparation of the next structure plan until after 2011. Preparation of the next structure plan formally started on 23 February 2007 when we published a Notice of Intent to develop a new structure plan. The timetable in the Development Plan Scheme shows that we hope to have a finalised plan prepared towards the middle of 2008 with the adoption of the plan by 2009/2010 (depending on whether an Examination in Public is held).
AS.21.2	Bruce and Partners urge Aberdeenshire and Aberdeen City Council to progress a formal Alteration to the current NEST Structure Plan utilising the expedited Alteration Procedure that was introduced under Section 37 of the Local Government and Planning (Scotland) Act 1982. Bruce and Partners consider it entirely appropriate that the planning authorities could justifiably submit a statement of reasons for deciding not to publicise or consult.	It is not the intention to alter the existing structure plan, but to prepare a completely new plan. It is not considered that an alteration would save much time, deliver the required change or address the participation agenda of the planning reforms.
AS.21.4	There is a lack of clarity as to what this new Strategic plan is supposed to be. It is unclear whether the new plan is a structure plan under the terms of the current planning system or a strategic development plan under the new Planning Act.	The plan is being developed under the existing regulations, and is therefore a structure plan. However every attempt is being made to embrace the Scottish Executives aspirations for reform and our new plan is being designed to emulate a strategic development plan.

Aberdeen City and Shire Issues Report

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AS.21.5	The issues report appears to introduce an expanded list of issues that merely add clutter and detract from clarity of purpose.	One of the purposes of the issues report is to generate debate and to inform our understanding of the priority of different issues. The issues are a distillation following wide community engagement.
AS.21.6	The whole issue of infrastructure provision should be an early consideration in the preparation of a strategic plan seeking to direct new development to sustainable and accessible locations.	Noted. A technical evaluation of the preferred spatial strategy, will be undertaken with infrastructure and service providers to establish whether the spatial strategy can be delivered.
AS.21.7	Clearer linkages should be made between the Vision Statement and the weaknesses highlighted in the six main reasons for preparing a new structure plan.	These linkages will be made in the application of the vision to the issues to derive the objectives for the plan.
AS.21.8	There is a clear understanding of the failures of the current structure plan although there is no consistent and direct link between these weaknesses into the vision and strategy of this new strategic plan.	The experience of the previous structure plan will inform the preparation of the new plan. This will be more clearly evident in the draft plan
AS.21.9	The structure plan should be a document that is used to direct development in a suitable fashion and not always constrain it.	Noted.
AS.21.10	There is no obvious link between the national planning framework and the vision statement.	Noted.
AS.21.11	We should be reducing the overly proscriptive approach that single use zoning has given to all our communities and any land for development should be zoned as mixed use.	Noted.
AS.21.12	Since the arrival of the oil industry, Aberdeen City has tried to encourage and retain much of the commerce and Aberdeenshire has provided much of the residential accommodation and these roles have been further encouraged by NEST.	Noted. NEST allocates employment land in association with residential land, but take up of employment land has been considerably less rapid than the uptake in residential land. Housing is more mobile than commerce which frequently seeks to "cluster" with its suppliers and customers, and this inevitable tends to encourage centralisation of commercial activities.
AS.21.13	There needs to be a rebalancing between the commerce in Aberdeen City and the residential accommodation in Aberdeenshire, and this needs to be the focus of any spatial strategy that is agreed.	Noted.
AS.21.14	Large scale mixed use development should take place adjacent to existing communities.	Noted.
AS.21.15	Little consideration has been given to other possibilities for allocating future development other than the possibility of a new settlement which has gained support, particularly if it is located within the AWPR.	A wide range of strategies are currently being considered.

Chair, NESAG
Mr Bill Howatson

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AS.68.1	The aspirations in the draft vision (I.e. to manage resources responsibly, to consider the needs of different communities and to be confident and courageous to allow change to happen) are welcomed.	Noted.
AS.68.2	While the 13 issues are fully relevant to the structure plan, it is important to recognise the interaction between these issues in both accessible and remote rural areas.	Noted.
AS.68.3	Focusing on rural development and land based sectors, a range of factors will influence the need for new development, regeneration and a step change from the existing NEST plan.	Noted.
AS.68.4	Regeneration is important to both urban and rural communities and specifically in agricultural dependent communities, where population and economic activity decline is demonstrated.	Noted.
AS.68.5	Economic and demographic change in primary land based sectors will influence the need for provision of modern, affordable, rural accommodation and access to sufficient infrastructure and services to maintain healthy, vibrant communities.	Noted.
AS.68.6	Economic and demographic change in primary land based sectors will influence the need for provision of modern, affordable, rural accommodation and access to sufficient infrastructure and services to maintain healthy, vibrant communities.	The local housing strategy will determine the need for affordable housing and the structure plan will draw on information from this. The pattern of development that the structure plan will prescribe has taken cognisance of the fact that in order to provide sufficient infrastructure and services it is necessary to allocate a critical mass of development to make these provisions feasible.
AS.68.7	As agriculture and forestry have a vital role in both landscape and environment management, while also making a significant contribution to the local economy, it is essential to maintain the economic base of these industries and that sustainable rural business development is enabled through the structure plan.	Noted. The structure plan will address the land-use implications of providing for rural economic and environmental development, from a strategic perspective - that is, from the point of view of the long term development of the region as a whole. The choice of a preferred strategy may have implications for rural development; any such implications will be identified and considered in the technical appraisal of possible strategies (see Table 1 in the Development Plan Scheme).
AS.68.8	As agriculture and forestry respond to reforms of agricultural and rural policies, the opportunities for alternative business development and diversification should be recognised within the structure plan.	Noted. The structure plan will address the land-use implications of providing for rural economic development and diversification, from a strategic perspective - that is, from the point of view of the long term development of the region as a whole.
AS.68.9	A clear strategy to deal with and enable new industries in appropriate locations (e.g. biomass, biofuels and other renewable energy developments that may be influenced by the availability of development land, while balanced with environmental impact) will be required.	Noted.

AS.68.10	Tourism is a key industry within the rural economy but it is not mentioned. The development of sustainable tourist facilities and activities will not only be influenced by land use and availability, but also by the development strategy in the structure plan.	It is noted that the draft vision does not make specific mention of the importance of Tourism to the region. The development strategy of the plan will be of central importance in determining the future development of land across the region and so on the broad distribution of facilities and services.
AS.68.11	The inclusion of design is welcomed. Good design principles are highly relevant in rural and land based sectors, as well as supporting innovative design techniques, building materials and utility infrastructure, such as heat, power and drainage.	Design types and techniques, and materials used in new buildings are issues more appropriately considered in the context of the next local plans.
AS.68.12	The structure plan should take account of national and regional strategies, and work closely with the specialist organisations in the regional forums that focus on these strategies in the development of the plan.	Agreed. The development of the draft vision reflected strategies and plans relevant to the Aberdeen region. Stakeholder engagement has been and will continue throughout the preparation of the structure plan. The Strategic Environmental Assessment also allows all relevant strategies and plans at the national to local scale to be considered during the development of the plan.

Churchill Homes
Mr Gordon Pirie

AS.74.1	Most groups of people, even the green lobby would prefer growth. As for a living economy, the status quo does not exist, and no one should desire recession. On that basis how much growth do we need or want?	The question of the scale of development that should be sought by the plan (in terms of the quantity of housing and employment land) is being pursued through engagement with communities and stakeholders on the strategic options.
AS.74.2	Only once the community have decided what level of facilities are needed, can a plan for growth be made.	This view suggests that the plan should only be drafted after the region's communities have provided a view on what is needed for the region. This is accepted and the issues consultation is one part of the process of determining what people want and require from the plan.
AS.74.3	It cannot be a foregone conclusion that if sufficient development land is made available, it will then follow that the necessary critical mass of population needed to sustain the desired facilities will be established. This is because the population is in decline and not growing.	Following over a decade of decline, the population of the region has grown for the last two years. As indicated in the vision, the development plan can have a role in facilitating population growth, if that is deemed desirable or necessary. It is accepted that a joined-up approach on this issue, between the structure plan and other high-level strategies, would be required to deliver any desired population change.
AS.74.4	We must create a stock of housing land that has already been through the planning mill taking the politicians out of the process in order that, as there is demand, there is supply to meet said demand to ensure that there is a sufficient number and range of houses and house types available for the population.	The Councils, in conjunction with private developers and housing agencies, shall seek to provide a range of houses at appropriate numbers.
AS.74.4	In order to grow our population we will need to make our area attractive as set against our competition and this can be achieved by providing opportunities for business to establish or grow in our area	Noted. This supports a strategy of growth.

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AS.74.5	We need to raise the amenity our area has to offer.	Noted. This is a key element of the vision
AS.74.5	Aberdeen/Aberdeenshire Councils need to commission an economic evaluation of the population at large in our area and for this commission to establish the level of population we would need in order to sustain the sort of facilities the community wants.	The wants of communities will vary considerably, and it is unrealistic to suggest that population levels to provide all wants can be achieved everywhere.
AS.74.6	The question of what the community wants/needs could be established by the same process that the structure plan process is taking.	The needs and wants of communities are likely to be wider than just land use planning. Community planning may be the vehicle for taking this issue forward.
AS.74.7	The less advantaged areas of our community can only be provided for by direct or indirect subsidy and this can only be provided by a growing community and the direction of resources, a stagnant or recessive community cannot provide anything.	Noted. The high growth scenario for development may be pursued in the new structure plan dependant on the outcome of the consultations on spatial strategies and the technical evaluation. This may help boost the economy which in turn could potentially improve less advantaged areas.
AS.74.8	Balancing the needs of our community is established at the most basic level and initially by the proposed economic evaluation, i.e. whats needed and where and what we need to do to provide it.	Noted. The level of need within a community, and the development required to support it will be provided through local plans
AS.74.9	We should better develop our own policy to protect green areas and call it something other than a green belt to stop it from being hijacked by all those who want to stop or cannot be bothered with the hard work of properly considered expansion, which does not mean that all, but probably most development takes place on green land.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The specific structure of the green belt (e.g. a 'belt' or wedge) will depend on the outcome of the review.
AS.74.10	The idea of the green fingers approach to the city has considerable merit.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AS.74.11	The design of our communities are extremely important, if properly carried out this has the capacity to improve the quality of health, reduce crime and create a positive caring sociable society. A higher allocation of housing land to build family homes now would also help to address this problem.	The comment is noted. Most of these are issues more appropriately considered in the context of the next local plans. The comment supports a high growth strategy.
AS.74.12	The Inverurie road is served by the rail network, but might it be possible to serve the other arteries to the City with a tram network which is subsidised in order that the cost of the fare was less than the cost of parking a car in the city for the day and further subsidised for key workers and students. This could be linked to the WPR with the car parks on the outside of the WPR.	Certain of the strategic options lend themselves to innovative transport solution such as this one. Whether it would be possible to provide more than one guided bus / tram axis is an issue of critical mass and will be assessed through the technical appraisal.
AS.74.13	We should strive to improve and change things in order to better the quality of our environment and reduce the impact we have on it although this should not be done at the expense of progress and should not be done to satisfy the passing whim of politicians who decide that this is new way of hoovering up the latest targeted fringe votes.	Noted.

AS.74.14 The Trump development should be provided with every assistance as contained within the spirit of the planning system. We should not let this one get away and the level of investment this would bring to our community and spin off's may only happen once.

It is noted that this view supports a development strategy that would complement the Trump proposal.

Communities Scotland

Ms Elaine Crawford

AS.50.1	Communities Scotland support the draft vision as set out. It is broadly in line with Communities Scotland's Corporate objectives.	Noted
AS.50.2	Changes in population structure require adaptable housing provision	Noted. This is not a specific issue for the structure plan and is more appropriately considered in the context of local or other plans.
AS.50.3	The housing needs of black and minority ethnic groups, gypsies and travellers and recent accession country migrants need to be considered	This is an issue which may impact on the scale of allocations to be made but is otherwise not of a strategic nature.
AS.50.4	Mechanisms for tackling regeneration need to be integrated and not allowed to operate in isolation.	Noted
AS.50.5	The balancing of developments should be considered on a spatial and community basis. Cross boundary issues between Aberdeen and Aberdeenshire should be an important part in the development process.	It is acknowledged that the needs of different communities at all scales needs to be taken into consideration in the new plan.
AS.50.6	Affordable housing has to be targeted to the areas where it is most needed and not just where land is released. The structure plan needs to be informed by up to date housing needs information and local housing strategies	Close working between the planning and housing interests within the local authority will ensure that there is consistency between the local housing strategy and the structure plan.
AS.50.7	Housing should promote mixed communities, and needs to consider service and infrastructure provision	Noted. The plan takes cognisance of guidance set out in SPP3 which states that in order to create mixed communities, a range of housing types is needed, providing for the needs of all in the community. The preferred spatial strategy, which will arise after the series of consultations that are currently being undertaken, will inform service and infrastructure providers of the likely requirements in the long term so that they can align their investment programmes accordingly.
AS.50.8	Housing quality and sustainability (particularly carbon footprint and environmental impact) should be promoted from the outset of any housing development. Design requires to be adaptable to changing household needs	Noted. Many of these are not issues for the strategic plan and will require action at a local plan level.
AS.50.9	The location of housing should be based on evaluation of information presented in Housing strategies and housing needs assessments, not by the availability of land	Housing needs assessments only assess needs for a certain sector of the population. They are one criteria that informs the distribution of development.

AS.50.10 Developments need to be integrated into an existing community, or should become a new community with all the associated services and infrastructure. New housing developments should not lead to economic or geographic exclusion.

Noted

Craigallan Homes Ltd
Mr Lloyd Garvie

AS.14.1 Renewable energy policy should have a much higher profile in the Structure Plan.

Noted.

AS.14.2 Many feasible wind energy developments are being opposed by CAA on the grounds of radar visibility and the structure plan should therefore facilitate an accommodation of interests between CAA and wind farm developers in order to deliver new radar infrastructure and new operating software which is capable of filtering out the false returns generated by turning turbine blades.

The structure plan is not in a position to specify the type of radar equipment that should be erected.

AS.14.2 As land prices are high there is no economic incentive for developers to provide open space or landscaped settings. This has resulted in bland and unattractive developments and also contributed to house inflation. The structure plan should indicate to local plans to make available at least 150% of the predicted minimum requirement in order to ensure developers compete on design.

Noted.

AS.14.2 Very little unconstrained housing land is released for development. This has resulted in high land prices, poor house design and low build quality.

We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly. The action programme will seek to identify constraint on land delivery, and seek to broker a means of overcoming it

AS.14.3 The structure plan housing allocation should not be used to try to force people to use public transport.

The new structure plan housing allocation will take cognisance of SPP3 and ensure that it offers opportunities for reducing travel demand and that there is the effective integration of land use and transport. This will seek to reduce the demand for travel and reliance on the private car and help to reduce general energy consumption.

AS.14.4 Cars will remain the preferred mode of transport for most people who do not live in Aberdeen City centre.

This is likely. However, with more spending on public transport (e.g. cross rail) and the increasing use of Green Travel Plans, it is hoped that the number of people using the car will decrease.

AS.14.5 If it was possible to convert the working population into public transport users, the transport unions would have an economic hold which would result in strikes and labour related disruptions to the public transport networks.

This is not a structure plan matter.

AS.14.6	If more housing land is provided then people will have more choice on where they live and how close to work they wish to live.	Noted. The plan will attempt to provide people with choice on where they live and how close to work they wish to live, within the confines of an agreed spatial strategy.
AS.14.7	If housing is concentrated near existing transport nodes which are already congested, then the problem will be compounded.	If it is an objective to maintain and improve quality of life then development would not be permitted to make an existing situation worse. This comment is taken as not supporting the "existing transport corridor" strategy.
AS.14.8	Land allocated for housing should be dispersed throughout rural areas.	Noted. This is taken as support for support for a level of development opportunity across rural Aberdeenshire. A strategy dependant solely on dispersed development has been considered and dismissed for a variety of reasons, including an understanding that such a pattern of developments would not provide the critical mass required to overcome the capacity constraints in infrastructure that such a pattern would promote.
AS.14.9	Large new housing estates create social problems- this would not happen in less concentrated, more dispersed rural areas.	Noted. The implementation of any allocations made, so as to avoid such problems, will be undertaken in the context of the local plan.
AS.14.10	There are social benefits of dispersed rural communities are the preservations of rural schools, businesses and crafts, people with better lifestyles and less congestion.	Noted. This is taken as support for support for a level of development opportunity across rural Aberdeenshire, A strategy dependant solely on dispersed development has been considered and dismissed for a variety of reasons , including an understanding that such a pattern of developments would not provide the critical mass required to overcome the capacity constraints in infrasrtructure that such a pattern would promote.
AS.14.11	The structure plan should promote the replacement of obsolete modern farm buildings, as well as the existing policies on the conversion of vernacular buildings.	It is unlikely that the replacement of farm buildings would make a significant strategic contribution to the development of the area. This is an issue that requires to be considered in the context of the local plan.
AS.14.12	If traditional materials are proposed to develop housing in rural areas, then a more relaxed planning regime should operate for housing in rural areas.	Noted. Design standards and housing layout will be fully addressed in future local plans.
AS.14.13	The use of traditional materials to develop houses in rural areas will not only make houses more visually attractive but also the stonework involved will help retain traditional skills and craftsmen in the area.	Design standards are an issue for future local plans, but the comment is noted.

Cult Bieldfield and Milltimber Community Council
Mr Colin Cranfield

Aberdeen City and Shire Issues Report

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AC.5.1	All decisions should be carefully thought through and justified, with public consultation, adding that it is important to 'let go of the past', where necessary, in order to revitalise and open up the city, as well as a sensible re-think of transport and other priorities. However, there is currently a mismatch between stated high-level strategies and what is happening (or not happening) in practice.	Noted. It will be important for the strategy and vision of the plan to reflect the aspirations of communities and stakeholders; it will also be important for the plan to be realisable, such that it can be implemented. The plan-led system of development provides for the realisation of an appropriate strategy.
AC.5.2	Unsure what it is meant by "environmentally sustainable" in the first paragraph.	This phrase relates to a vision for the city region whereby resources are used efficiently and adverse impacts on the local, national and international environment (e.g. pollution and climate change) are minimised.
AC.5.3	The first sentence in paragraph 2 ("the plan will encourage new development...") is too vague.	The vision is a statement of aspiration. The specific ways in which the vision shall be understood in relation to the development of land, will be made clear in the future plan - land-use planning goals that reflect the vision (as revised), as well as the issues that the plan should address, will be made clear in the plan's aims and objectives and through the choice of an appropriate strategy.
AC.5.4	Greater emphasis should be given to sustainability, particularly with transport use within the vision, along with an integrated approach to development planning and transport needs.	Noted. This view suggests that the vision should be re-worded to emphasise the importance of the considering the need to travel in order to achieve the vision.
AC.5.5	According to the Report of Survey, new housing has been built in places without good public transport, employment levels are forecast to fall, and tourism may play a greater role in the future, which suggests that development in the Aberdeen hinterland needs to be more carefully planned (e.g. congestion and landscape quality). As a result, there needs to be a flexible and adaptable approach when planning future development, incorporating the needs and individual characteristics of both the City and the Shire, while attempting to achieve overall regional goals. Periodic reviews will be required to adapt to strategies as appropriate.	Noted. This response is taken to support the general concept of planning through a spatial strategy, where impacts can be managed, a level of development to cater for local needs and wants independantly of the needs of the city region as a whole , and the need for regular review of these components of the plan. There will be monitoring and a formal five year review of the plan.
AC.5.6	People from overseas should be integrated as far as possible, rather than treated as a separate group.	This is not a structure plan issue.
AC.5.7	New housing and facilities built on the remaining brownfield sites should be provided for less advantaged families, rather than greenfield sites.	It is important to provide a range of housing on both brownfield and greenfield sites.
AC.5.8	Reassessing the role of the green belt is the first step to changing the landscape setting of the area, which is likely to have far-reaching implications.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AC.5.9	The sensitive areas along the Deeside valley should be protected.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.

AC.5.9	Insulation in homes must be raised above the present specifications.	Noted. This is not a strategic issue.
AC.5.10	New development should be directed towards settlements like Kingswells, to enable them to grow large enough to support their own shops and secondary schools in a manageable way.	The plan will take into consideration the guidance set out in SPP15 which outlines the importance of creating and maintaining critical masses of development in order to ensure settlements are self sufficient and able to maintain their function in the local economy.
AC.5.11	Large housing developments of one style of house should be avoided, as this leads to an influx of people at a similar stage in life, with similar aged children, resulting in schools and other facilities unable to cope with the 'age-spike' produced.	Noted.
AC.5.11	More land should be set aside for business development but we should ensure first that all redundant oil industry sites are redeveloped for other business/ industrial use.	Noted. This view supports the idea that brownfield sites allocated for employment purposes should be released prior to greenfield sites, allocated for the same purposes.
AC.5.12	Most new developments are bland and consist of only rows of tightly packed houses. There needs to be a better balance of local amenities and green networks, with each settlement having their own 'village square' to provide a sense of community focus. Existing developments focus on short-term developer gains (e.g. profits), whereas the long-term benefits of reducing social exclusion and crime through well designed places should be considered.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AC.5.12	The heritage issue should be incorporated into the whole plan.	Agreed, and the draft vision highlights the need to manage built heritage resources responsibly.
AC.5.13	There is unlikely to be sufficient population (customers) for all the new out-of-town large shopping areas planned in Aberdeen City due to the isolated nature and limited population of the North East. Similar for out-of-town developments, who will have to compete with central Aberdeen shops.	No new out of town shopping centres are currently planned in Aberdeen City. Under national policy guidance, such proposals would have to undergo sequential assessment (see SPP 8) and demonstrate minimal impact on existing centres.
AC.5.14	Although there is likely to be limited brownfield sites in Aberdeen City, land set aside for employment should be allocated on brownfield sites as far as possible. The forthcoming urban capacity study will provide some assistance.	Noted. As stated in SPP 2, it will be important to provide opportunities for development in a range of locations and to provide a choice of sites, in order to facilitate the growth of the region's economy. This consideration will be important in determining the suitability of brownfield sites for employment land allocations.
AC.5.15	A more joined-up approach is necessary to deal with North East transport issues, with a strategy that is integrated and adequately funded to meet the aims of the National Transport Strategy and its goals.	Noted
AC.5.16	According to the Oscar Faber study (1998), the AWPR and the three proposed Park and Ride facilities are unlikely to reduce peak-hour traffic, but with the Aberdeen City Centre Masterplan promoting schemes with parking facilities, how does that reduce traffic journeys? Where is the cost-benefit analysis, and what effect will this have on the funding of other aspects of the NE transport system?	Noted. This is a major challenge for both the regional transport strategy and the structure plan. Key to reducing the need to travel will be integration and provision of opportunity to choose different modes.

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AC.5.17	The proposed developments in central Aberdeen appear to make the case for alternatives such as the Eastern Bypass tunnel, which would reduce more traffic than the AWPR. This shows the importance of traffic modelling as a useful tool, which can supplement and enhance planning decisions. Where traffic modelling has been undertaken, the results should be made available to the public.	The Regional and Local Transport Strategies set the transport policies for the region. Transport models are indeed useful tools, but in determining land-use planning decisions (and these are to be distinguished from transport planning decisions) other factors must also be considered, in addition to the transport-related effects of development. It is envisaged that transport modelling will be used in the technical evaluation of possible strategies for the future development of the region. The outcomes to this process of technical evaluation will be made public.
AC.5.18	There is a need to adhere to the principles that genuinely put the effects of climate change to the fore.	Noted.
AC.5.19	The character and heritage value of the region should be preserved to attract professional and successful entrepreneurs to the area.	Noted.
AC.5.20	We disagree with the associated benefits of the AWPR, as highlighted in the Report of Surevy (para 5.6.6), as the new road will only act as a means to opening up the green belt to development, while having a insignificant effect on traffic congestion, and it does not link up with any multi-modal transport strategy. Are concerned that the spatial strategy will lead to this scenario. The AWPR will lead to greater congestion, draw economic activity away from central Aberdeen, have a negative effect on tourism, and have an irreversible adverse impact on the economy of the region as a whole.	Noted. The approach to this plan assumes that the AWPR would be built, as this is the current policy of all authorities involved. The benefits or otherwise of the AWPR will be tested at the Public Inquiry.

Culter Community Council
Mrs Marjory Skinner

AC.4.1	The vision is aspirational and is also all- encompassing/ covers all the bases.	Noted.
AC.4.2	We should try to attract people to the area and increase, not just maintain, the population.	Noted. This is taken as support for a "high growth" scenario.
AC.4.4	If the population is just to be maintained then why do we need more housing?	Falling household size means that more houses are required even to accommodate a stable population. The desirability of growing the population needs to be addressed by the plan.
AC.4.5	In Aberdeen there is a dearth of family houses/flats and homes/flats properly equipped for the ageing population.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document.

AC.4.6	Too many communities in the past have expanded as dormitory villages.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development when it should be released and also the preferred locations for development . A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations shall then be made accordingly.
AC.4.7	It is inevitable that some green belt land will be needed for development in the future but this must be done by expanding existing communities and minimising land need/use and also ensuring that there is public access to green space for informal use adjacent to all communities particularly in the city.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The green belt may not only be defined as a 'belt', but could take a number of forms including wedges of green belt between settlements.
AC.4.8	Existing wildlife sites must be protected and new ones should be looked for and added for public enjoyment and leisure.	Noted.
AC.4.10	Energy saving ideas must become standard requirements in all new build houses.	Noted.
AC.4.13	A large proportion of new development needs to take place in the city to balance the needs of family homes and also more housing suitable for the ageing population to live in their own homes for as long as possible.	Noted. We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development . A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Strategic allocations for housing land shall then be made accordingly.
AC.4.14	The towns within a 20- miles radius of Aberdeen should have only small development to balance out their sustainability	Noted. This is taken as support for a dispersal strategy. A strategy dependant solely on dispersed development has been considered and dismissed for a variety of reasons , including an understanding that such a pattern of developments would not provide the critical mass required to overcome the capacity constraints in infrastructure that such a pattern would promote.
AC.4.15	More should be done to develop areas such as Peterhead and Fraserburgh which are suffering loss of fishing jobs and other small industries.	Noted. This is taken as support for a "key settlement" based strategy.
AC.4.16	Aberdeen-Peterhead/ Fraserburgh link should be used only to serve existing towns/communities.	Noted
AC.4.17	Inverurie- Stonehaven cross-rail should be used with more stations opened within the city to help development links with an already existing transport system.	Noted. Proposals for Aberdeen Crossrail are at an advanced stage of development and have been taken forward by Nestrans, in partnership with Aberdeenshire and Aberdeen City Councils, Transport Scotland and the Rail industry.

AC.4.18	The re-opening of the Deeside Railway line is not a viable proposition because of the huge cost it would entail to re-establish bridges and demolish housing and business sites and it would also take away a well-used, established cycling and walking path.	Noted. This proposal could only be undertaken if there was the critical mass of development concentrated near the railway line to fund it. It is noted that this is now an established cycling and walking path.
AC.4.19	The Western Peripheral Route should not be viewed as a development corridor and should be maintained with only the few junctions proposed as a fast access link around the city, and for getting quickly north and south.	Agreed. This is the position of both Planning Authorities

Defence Estates

Mr Kenneth Daly

AS.52.1	Please add Defence Estates (MoD) to the list of Public-sector stakeholder groups given in Appendix 5 of the Development Plan Scheme.	The development plan scheme does not contain exhaustive lists of those we propose to consult with. The list extends to over 1,000. The development plan scheme will be reviewed in 9 months time and consideration will be given then to including Defence Estates.
AS.52.2	Defence Estates would like assurance that the Aberdeen Western Peripheral Route will not effect the use of the MoD ranges at Blackdog.	Any impact the AWPR will have on the Blackdog firing range is not a struture plan matter. The approval process for the AWPR is completely separate.
AS.52.3	The vision should be more positive about the need to protect the environment. It should state that development will not take place in woodlands, moorlands or dune areas, because the environment is a key asset and a magnet for attracting businesses and people to the area.	Noted. This comment suggests that the vision should be re-worded to emphasise the need to protect the region's natural heritage.
AS.52.4	By protecting the natural environment from development, the plan can deliver the Government's agenda for health, social inclusion and a low level of crime. Brownfield land and farmland should be the only options for development, as there is a shortage of "wild land/places" across the region.	Noted. The draft vision highlights the need to manage natural heritage resources responsibly. The spatial option selected for developing the region will depend on a number of factors including the impact each one may have on the natural environment. These impacts will be highlighted in Strategic Environmental Assessment, and the Appropriate Assessment of internationally protected natural heritage sites.
AS.52.5	The next structure plan should strongly favour small local businesses and communities, with a view to making towns and villages more self-sufficient. This requires a "courageous" stance against supermarkets and big business so that demand for travel by car and air reduces; it also requires a return to basic planning theories such as the Concentric Zone Theory.	This is taken as support for a level of development opportunity to meet localised needs and to sustain local communities. Application of concentric zone theory would suggest that there is a place for "big business" at the core of the City region zone but such a model is very simplistic to apply to a spatial strategy for the structure plan.
AS.52.6	The Green Belt should not be relaxed unnecessarily - the urban sprawl of the city should not continue. Instead, land use within the city should be maximised and other towns should be encouraged to become more self-sufficient.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.

AS.52.7	Towns across the region should be planned to fit the old Concentric Zone Theory, so that individuals are less reliant on the car.	Concentric zone theory is currently applied to retailing and office type uses through the application of a sequential approach to site selection. Concentric zone theory for residential and business land allocations has, to some extent, been discredited as being inflexible, and an approach which promotes mixed uses is favoured.
AS.52.8	The generation of electricity through the use of renewable resources (e.g. wind and water) is wise, but the activities involved in this should not compromise existing activities on and around areas of land used by the MoD e.g. Blackdog ranges. Renewable energy developments could be located on farmland, rather than on wild land.	The requirements of SPP6, will be considered in the development of the structure plan. Site specific concerns are a matter for local plans.
AS.52.9	Wild places should not be urbanised by installing surfaced footpaths, fences, gates or sculptures. This way of managing areas of wilderness is detrimental to wildlife and creates a false sense of security amongst visitors, which can lead to accidents.	Noted.
AS.52.10	The Aberdeen Western Peripheral Route should not become a reason to release land and create further urban sprawl. Towns should be encouraged to grow and become self-sufficient, but urban sprawl around Aberdeen should be discouraged as this will create more commuters. Development within the city should maximise the use of land e.g. it should occur on brownfield sites.	Noted. These comments support the "key settlement" strategy, but there have to be concerns that such a strategy would increase commuting, rather than diminish it as people commute between centres. The comments on brownfield land support this as a strategy for development within Aberdeen City.

Forest Cottage

Ms Julie Nairn

AC.13.2	The plan should promote fewer "suburban" type developments with few facilities and with no "community spirit". More consideration should be given to develop integrated housing/workspace/leisure/shopping combinations, in community clusters. This would provide for developments that have a friendly village/small town feel and that reduce the need to travel for work and leisure.	Noted.
AC.13.3	The plan should consider the integration of walkways and cycle routes into new developments, so that these can form part of the infrastructure at the time of development.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AC.13.4	Housing for the disabled should form part of a "community cluster" type development. Integrated communities should be encouraged, with housing for the elderly mixed with other housing, to give the elderly better choice/options.	Noted. The plan will take into consideration guidance set out in SPP3 which states that in order to create mixed communities, a range of housing types is needed, providing for the needs of all in the community.
AC.13.5	More thought should be put in to the location of housing for the elderly e.g. not on top of steep hills, but close to shops, community facilities and public transport stops.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.

AC.13.6	The Councils should make the effort to encourage new industries and not just oil and oil-related businesses.	Noted. This view relates to the effective management of the economy and as such, it is of specific relevance to an economic growth strategy (a type of document that is produced by Aberdeen City and Shire Economic Forum), rather than to a land-use development plan. It will however be important for the structure plan to support the economic vision for the area e.g. by providing a vision for development that enables the diversification of the regional economy. As such the vision statement may require amending.
AC.13.7	The plan should consider placing new developments adjacent to existing established towns and settlements, where a good number of services already exist. New services should be added to contribute to the whole, not to take away from what is already provided.	Noted. This is taken as dismissal of a new settlement strategy.
AC.13.8	I would not wish to see urban sprawl to the east of the future AWPR, such that communities are swallowed up to become a mass of suburban residential development and business parks/industrial sites. If a new development should take place near to the AWPR, it should be to the west - this will keep existing communities intact and provide for green spaces close to the city.	Noted. This is taken as support for development of a "edge of city" communities strategy.
AC.13.9	To reduce the volume of traffic travelling through Peterculter, Milltimber and Cults, a new road could be built from the current North Deeside Road (before Peterculter), across the existing Malcolm Road and on to join the proposed AWPR directly at the Milltimber interchange. Such a road could reduce congestion and provide a quicker, safer route for travellers and freight coming from Deeside.	The Regional and Local Transport Strategies for the region provide the transport policies for the region. The view that such a proposal would provide for the effective future management of traffic in this area is however noted.
AC.13.10	We have land in the current green belt area near to Peterculter and would be happy to have it (in whole or in part) allocated for housing or used to provide for highway or transport-related improvements, if this should be deemed appropriate by future local or structure plans.	Noted.

Forestry Commission Scotland

Mr John Risby

AS.4.1	The Forestry Commission have an interest in the plan, and wish to be involved at the appropriate stage.	Noted.
AS.4.2	Woodlands have a role in promoting regeneration (i.e. providing a setting).	Noted. The site specifics of any new woodland is best cited in a local plan policy.
AS.4.3	Workers and their families from other countries should be encouraged and helped to integrate.	Noted
AS.4.3	Woodlands make a contribution to climate change (e.g. as a source of bio-energy).	Noted. This is not a structure plan issue

AS.4.4 There is a need to improve access to woodlands and to develop forest habitat networks to support biodiversity.

Noted, but this is not a structure plan matter.

Garioch Community Council

Mr Mike Cunningham

AS.26.1	Employers should be encouraged to locate to Inch, in order to provide employment opportunities for the expanding local community.	Noted.
AS.26.2	Unless new employment opportunities are provided together with new homes, people will have to commute from Inch to work in larger centres such as Aberdeen.	Reducing the need to travel through integrating housing and employment opportunities should be a key objective of planning policy
AS.26.3	Development in the West Garioch Community Council area should take place in the smaller villages as well as in Inch. This would prevent Inch from losing its identity and ensure the continued viability of the villages.	This is taken as support for a proportion of development to be allowed to cater for local needs
AS.26.4	All development in the Inch area should include a significant proportion (50%) of affordable housing. Small commercial premises should also be provided with the housing.	The view is noted. The proposed proportion of 50 % of affordable housing may be unfeasible economically consequently may not lead to delivery of the development.
AS.26.5	Young and economically active people should be encouraged to locate to rural settlements, to provide thriving village communities.	The structure plan can only provide opportunity for the development of land and cannot solely entice young and economically active people to locate to rural settlements, to provide thriving village communities.
AS.26.6	All new housing should be energy efficient and use sustainable technologies to achieve this. New housing and business clusters should use communal combined heat and power systems.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.26.7	More land should be made available for housing, to reduce the high cost of housing land. Some agricultural land should be made available for building small "hamlets".	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AS.26.8	Greater utilisation of the Aberdeen to Inverness railway line could reduce the reliance of smaller communities (such as Inch) on Aberdeen as a shopping and employment centre.	Noted. This is taken as support for the "existing transport corridor" strategy.
AS.26.9	Improvements to the Aberdeen to Inverness line, such as the re-opening of smaller stations, could bring benefits to existing communities and increase the attractiveness of rail travel for commuting purposes.	This is taken as support for the "existing transport corridor" strategy.

Garioch Heritage Society

Dr. Geoffrey Gill

AS.29.1	A larger premises to display the Garioch Heritage Society's numerous artefacts and to accommodate additional facilities (visitor attractions, exhibitions) is required and is being planned. The Society hopes that a Heritage Centre in the centre of Aberdeenshire would be encouraged and supported.	Noted. This is not a strategic issue.
AS.29.2	The region's heritage is important and should be emphasised, to boost tourism and to educate the local community.	Noted, although mechanisms to boost the regions heritage for tourism and to educate people on natural heritage are outwith the remit of development plans.

Graham & Sibbald for Auqhorthies Estate

Mr Ian Kelly

AS.62.1	The future realisation of the Aberdeen Western Peripheral Route and the Crossrail Project will enhance the attractiveness of the Portlethen area as a place to live and work.	This is taken as support for the existing transport strategy, as the statement made is true along the length of that corridor
AS.62.2	The expansion of Portlethen would clearly fit with possible Strategic Options 1, 2, 6, 7 and 8. It is therefore considered that there is a strong case for the consideration of development proposals in the Portlethen area, such as those related to the land of Auqhorthies Estates.	Noted. This is taken as support for the "existing transport corridor" and "edge of city settlement" strategies.
AS.62.3	Housing development allocations for the Portlethen area will facilitate the continued growth of the region, by meeting future housing land requirements associated with the Aberdeen Housing Market.	Noted. This is taken as support for the "Edge of city communities" and "Existing transport corridor" strategies
AS.62.3	Market demand and the support for rural locations are key objectives and some element of the land allocations should support these.	Noted. This supports the concept of an element of the development allocations being reserved for local needs and hopes.
AS.62.4	The expansion of Barentoy Park would allow for the short-term provision of marketable industrial land in the area. This will help realise the economic potential of the region.	The view that an expansion of Barentoy Park would help to realise the economic potential of the region is noted.
AS.62.5	Development in the Portlethen area could provide attractive, sustainable places to live and work, following the implementation of the Aberdeen Western Peripheral Route and the Crossrail public transport project. Such development could also be linked to the town, to create a quality environment where people are able to live and work without having to travel extensive distances.	Noted. This is taken as support for the "Edge of city communities" and "Existing transport corridor" strategies
AS.62.6	The development of land surrounding Portlethen would conform with the expected aims and objectives of the proposed Aberdeen City and Shire Structure Plan.	Noted. This is taken as support for the "Edge of city communities" and "Existing transport corridor" strategies
AS.62.10	If the release of areas of green belt is planned for, development in these areas could be in line with and support the general aims and objectives of Scottish Planning Policy guidelines.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt has yet to be undertaken.

Graham and Sibbald for Cannon Solicitors

Mr Ian Kelly

AS.44.1	Seeks to secure the release of land at Netherly. The site is not in itself of strategic significance but would address ongoing demand for land in the Aberdeen Housing Market Area, provide for specific locational needs which will be sustainable in form.	The issues report did not request development bids and sites of this scale are more appropriately considered in the context of the local plan. However this representation supports the need for local development in addition to strategic allocations.
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GVA Grimley LLP

Mr Peter Carus

AS.36.1	Although SPP8 provides a presumption in favour of town centres for new retail development, it should be noted that sites at these locations are not always appropriate or suitable for certain retail formats. It is important that an indication of the type and scale of suitable retail development is given for those town centre sites that are identified for retail development.	This is an issue which is particular to certain town centres and requires to be determined within the local plan.
AS.36.2	The structure plan should establish a policy framework and strategy suitable to ensure that the land use needs of those retail developments unsuitable for town centre locations are also accommodated.	Noted. The structure plan will seek to identify town centres and other retail locations in accordance with SPP 8
AS.36.3	Retail, and in particular convenience retail, is a key contributor to the Scottish Economy.	Agreed.
AS.36.4	Retail policies should be based on up to date and accurate information. A full review of existing and committed retail provision should be carried out on a regular basis.	Noted. Aberdeen and Aberdeenshire Councils undertake a full review on an approximately 5 year cycle. This is deemed appropriate at the strategic scale

Haliday Fraser Munro for Heron Properties Ltd.

Mr Bob Reid

AS.49.1	Heron support the development of a new community at Counteswells of 2000 homes	Noted. This is taken as support for urban expansion
AS.49.2	The weighting of development should be greater than 75% towards the Aberdeen Housing Market Area, an emphasis towards Aberdeen City and with sustainable new settlements as a key means of delivery	Noted.
AS.49.3	As much as 90% of growth should be directed to Aberdeen City	Noted.
AS.49.4	Heron advocate a high growth scenario of 60,000 homes in the plan period, with 45,000 of these focused on Aberdeen City	Noted. The response favours a high growth scenario

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AS.49.5	Focussing development on Aberdeen City, with minor development in both the existing transport corridor and the edge of city settlements is promoted as the preferred development strategy, predicated on the delivery of the AWPR and Crossrail	Noted
AS.49.6	To continue current trends in housing allocation would result in settlements in the Aberdeenshire part of the AHMA ballooning, resulting on greater pressure on existing facilities and infrastructure.	Pressure on infrastructure and facilities will occur no matter where development occurs. The issue is to ensure there is sufficient critical mass of development to ensure new developments can be sustained without such unacceptable impacts.
AS.49.7	Any new settlement must incorporate land to accommodate office space, convenience and comparison retailing.	Noted.
AS.49.8	Existing settlements have a limit for expansion that has to be realised at some point to prevent "urban sprawl" over countryside areas. Even with substantial investment such practices cannot be sustained and alternatives such as new settlements, must be considered.	Urban sprawl is an issue of urban design rather than spatial strategies. The issues report highlights the need to create high quality environments.
AS.49.9	New sustainable villages of around 2-3000 population around the city are an appropriate solution, avoiding urban sprawl and encouraging sustainable patterns of living and reducing reliance on Aberdeen City.	The number of such new settlements required to meet the respondents target of 60000 homes would be in the order of 20 to 40. This represents its own "urban sprawl" and it is questionable whether development of that scale would provide the critical mass to enable significant improvements to be made to infrastructure to accommodate the proposed growth. It is not clear how these communities would reduce reliance on Aberdeen City when they would be so clearly associated with the city for the majority of their services.

Halliday Fraser Munro for Glenmore

Ms Jill Patterson

AS.46.1	The spatial strategy needs to consider the important contribution of rural areas to the city region; sustainability at a local level is of considerable importance.	Noted.
AS.46.2	Given the largely rural nature of the structure plan area, it is essential that the structure plan policies and strategies address the social and economic challenges (e.g. decline in service provision and low levels of business growth) in rural areas. The structure plan should also seek to capitalise on the opportunities that rural communities and areas offer.	The needs and opportunities of rural areas will require to be considered in the structure plan's spatial strategy.
AS.46.3	The strategy and policies of the new plan need to allow for economic growth, in order to maintain and grow the regional population, support local services and help regenerate rural areas.	Noted. Promotion of opportunity for economic growth as a priority for the plan is taken as support for "front loading" and "High growth" elements within the strategic option.

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AS.46.4	The strategy should capitalise on the region's key asset - the high quality environment - to help compete with other city regions. The key aim of the strategy should be to maintain and grow the population. This will support economic growth, which will in turn help to create a successful and attractive location for people and businesses.	Noted. The high quality environment is only one aspect of the quality of life issues which the plan requires to promote, as a unique selling point for the area. Identification of maintaining and growing the population of the area as a key aim of the plan is taken as support for medium and high growth options within the strategy.
AS.46.5	The spatial strategy should allow small-scale development in rural areas and in dispersed rural settlements. This could mean development as an extension to loosely clustered groups of housing, or alongside individual houses or farms. Small clusters of houses can provide for sustainable development, by offering opportunities for home working and providing custom for local services and facilities.	Noted.
AS.46.6	The new structure plan should support limited development in or next to rural settlements. This may involve adopting a more accommodating approach to housing in the countryside	This will be dependant on which spatial strategy is selected after a series of consultations and reviews by infrastructure and service providers which will determine where most development will be located throughout the region within a strategic allocation. A smaller allocation may be made to reflect local need.
AS.46.7	The Councils should recognise that as some of the main towns in Aberdeenshire increase in size, dependent communities will be created. As such, the largest towns are likely to have their own commuter populations, living outwith the centre. The distinctive needs of such populations should be taken into account.	Noted
AS.46.8	Tourism is a key contributor to the economy of the region and leisure facilities are vital to many rural communities. The structure plan should adopt a strategy that helps to support small-scale tourist development, where this is suitable for the local economy and environment.	Noted. Unless the strategy adopted for the structure plan indicates otherwise, the promotion of small-scale developments for tourism purposes would be an issue appropriate for a local plan. It will be important that the final development strategy does not adversely affect the growth of tourism across the region.
AS.46.9	A proportion of the housing allocations provided by the plan should be directed to rural areas/communities.	Noted.

Halliday Fraser Munro for Mr J McIntosh

Mr Bob Reid

AS.47.1	Hypothesis 1[Reserving a proportion of the overall allocation for local needs] proposes a balance of development land between the Aberdeen and Rural Housing Market Areas. The closer development is to Aberdeen, the better.	Noted.
AS.47.2	Hypothesis 2 couples the strategic land allocations with the 'major themes' of the strategy. As sustainability will be the main theme, along with economic and rural development. Allocating land for tens of thousand of houses will require new assumptions about location and density to be considered in far greater depth. As a result the few available locations that exist for new settlements must be a fundamental part of the new structure plan.	Noted. This is taken as support for a new settlement strategy.

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AS.47.3	Hypothesis 3 looks at the scale of the development that should be planned for, and believe that the High Growth scenario is the correct option, based on present building and development rates and house price inflation.	The support for a high growth scenario is noted
AS.47.4	It is clear that new settlements feature in nearly all of the spatial options suggested, and favour two options AWPR and Existing transport corridor (with most development in Aberdeen), and propose these options should be considered as Phase 1 and 2.	New settlements only feature in one of the spatial options currently being considered . A strategy based on development along the AWPR has been considered and dismissed.
AS.47.5	The structure plan will have to take account of other strategies and contexts: the National Planning Framework, the AWPR, NESTRANS Transport Strategy, and ACSEF (economic) Strategy.	Noted.
AS.47.6	The AWPR is only being built to allow for a 15 year growth in traffic, and the junctions as presently designed have limited capacity to cope with the growth proposed in the structure plan scenarios, and should be redesigned, especially the Goyal junction.	This is noted. However, the AWPR factors in growth up to 2011 to reflect the growth proposed in the City's and Shire's current local plans. It is highly unlikely that the junctions can be changed now, as it would require years of work (e.g. assessments and studies) to reflect the changes, as the public inquiry is due later in 2007. Rather, it would be for the applicants whose development may affect the capacity of the AWPR at specific junctions to discuss potential options with Transport Scotland.
AS.47.7	Established settlements in the AHMA simply cannot continue to grow without appropriate infrastructure and facilities investment, and will reach a limit to their expansion, in order to prevent 'urban sprawl', particularly in countryside areas. The most appropriate solution is the 'sustainable village' of around 2-3000 inhabitants within the AHMA in the city, reducing the reliance of settlements in the AHMA and creating self-sustaining environments.	We do not agree that a large number (up to 25) new "villages" within the Aberdeen City region is an appropriate solution, and will in itself create urban sprawl and the suburbanisation of the countryside surrounding Aberdeen City. We agree that established settlements within the AHMA will require infrastructure to continue to grow, but disagree that limits to their expansion require consideration of a different growth strategy. We do not believe that villages of 2-3000 inhabitants represent sustainable communities.
AS.47.8	Sustainable villages would require: a range of housing, types and tenures, a village centre (including retail, commercial, primary school), recreation space and accommodation, safe and pleasant environments for pedestrians, shared public spaces, short walking distances between dwellings and facilities, varying residential densities (e.g. higher in the centre and lower at the edge), excellent public transport links to the City, and a sense of identity and recognisable character. Examples include BedZED, Lightmoor and Dickens Heath.	Noted, and welcome the positive approach to settlement layout design.
AS.47.9	Perwinnes, north of Bridge of Don is promoted as an opportunity for developing a sustainable village, which is an area of farmland extending c156Ha and south of Corby Loch. The site is 8km from Aberdeen City Centre, close access to the proposed AWPR, and significant 'green wedges' would be retained towards Corby Loch. The settlement could be free-standing, or part of an existing community - Whitestripes or Middleton Park. The scale of the development would maximise energy saving and energy generation, and the use of planning gain to building more effectively social and physical infrastructure.	This is taken as support for a strategy for urban expansion around Aberdeen City, or for AWPR Villages

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AS.58.1	The starting point of the proposed spatial strategies are wrong. The process should start from identifying where the most sustainable locations for new development can be secured, these include: being sustainable, have good access to transport networks, create some form of consensus amongst the wider population, create quality environments, not constrained, and are able to take advantage of south facing slopes.	The process suggested is incremental and opportunistic rather than strategic. The considerations identified are more appropriate in the implementation of the chosen strategy through the local plan.
AS.58.2	Of the high growth scenario, the total number of houses proposed should be split evenly between the City and the Shire. Developments in the Shire should be in sustainable locations and take advantage of public transport links.	Noted.
AS.58.3	Any land allocations should relate closely to policy objectives, with sustainability being the core objective, although market demand and the support for rural locations are also key objectives, and some element of the land allocations should support these.	The support for sustainability, promotion of rural development and marketability as objectives of the plan are noted.
AS.58.4	A carefully planned high-growth scenario is the most appropriate for the City Region.	This is taken as support for a high growth scenario in the context of a spatial strategy.
AS.58.5	The development of settlements near the AWPR, and along the transport corridors (as well as the City) are the two favoured spatial options, as they hold the most benefits for the structure plan, and perhaps should be seen as phase 1 and phase 2. This is predicted on the time lag which is envisaged for the delivery of the AWPR and the cross rail service from Stonehaven to Inveruire.	Noted, this is taken as support for the "Edge of city settlements" and "Existing transport corridor" strategies. The comments on phasing are noted.
AS.58.6	The development of the structure plan will have to take account of the National Planning Framework (which may include national developments), the AWPR (e.g. it will focus development onto the radial development corridors), NESTRANS transport strategy and ACSEF (economy) strategy.	Noted.
AS.58.7	One of the key concerns industry continues to mention is recruitment and the ageing characteristics of the present workforce.	Noted. The planning system can only address these issues by managing the future use of land and providing opportunity for the population of the area to increase.
AS.58.8	The affordability of housing in the region is an important consideration. The rise in house prices can be part attributed to the lack of new completions and ever-increasing household numbers.	Noted
AS.58.9	Growth levels in the oil industry are not expected to present a great demand for employment land. It is more likely that employment land for office space and retail will be required. Any new settlement or extension must incorporate land and accommodation for these uses.	Noted. It is likely that a flexible approach to planning for particular land uses will be required, if we are to achieve the aim of providing for the economic growth and diversification of the region. The requirement for new retail and office developments will depend, amongst other things, on the impact of large-scale development on the existing facilities and services.
AS.58.10	Current travel to work patterns indicate a large daily influx of commuters to Aberdeen City from both the main settlements in the AHMA and a wider rural area. In order to avoid urban sprawl, the most appropriate solutions are 'sustainable village' and the 'sustainable urban extension' of around 2-3000 people. This would reduce the reliance of settlements in the AHMA on Aberdeen and create self sustaining communities.	Noted. This is taken as support for a strategy of urban extension of Aberdeen City. The concept of a "sustainable village" as a solution to the development land needs of the area is inappropriate as it does not provide the scale of development to meet needs of that community, and is dependant on travel to other locations for employment and services.

AS.58.11	It is unlikely that smaller developments will be able to achieve sufficient critical mass to afford the infrastructure costs.	It is agreed that there will be cases where small scale development is insufficient to deliver the required infrastructure.
AS.58.12	There are a small number of examples of settlements founded on sustainability principles in the UK, and the majority of these tend to be on brownfield sites. The examples cited on the principles of sustainability are still in their infancy, but they present a viable alternative to the continued expansion of housing estates on the edge of existing settlements.	Noted. This is taken as support for a strategy which promotes new settlement development on brownfield land as an alternative to urban expansion. Whether there is sufficient brownfield in the Aberdeen City and Shire Area to accommodate the volume of development which could be required will be assessed through the technical assessment of the spatial strategies.
AS.58.13	Blackburn presents an excellent opportunity for future development and expansion into a sustainable village, given its proximity to Aberdeen, and its location on the main transport corridor. Furthermore, the site is identified in the Aberdeenshire Local Plan as a 'fn*' site for future housing developments.	The bid supports the spatial strategies for the expansion of existing settlements along the proposed AWPR and along the main transport corridor. However, site specific proposals will be considered in the context of the next local plan.

Halliday Fraser Munro for Chap Homes

Mr Bob Reid

AS.48.1	Largely as a result of climate change, new developments will have to be as sustainable as possible. This means that brownfield sites will be preferred for development, that development should be close to Aberdeen and that houses will have to minimise the energy and water they use and the waste they produce.	Noted.
AS.48.2	There will be continued growth in housing demand from new households and in-migration.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document.
AS.48.3	It is likely that 60,000 new homes will be needed over the next 30 years. The great majority of these homes should be allocated to Aberdeen. This will help achieve the critical mass needed to improve facilities and provide for vital infrastructure.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure and service providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AS.48.4	CHAP homes recommends that development should be focused on new self-sustaining communities, at least 1000 houses in scale. New infrastructure (such as roads, drainage and schools) can be paid for more easily and better sustained by building new villages of this scale. CHAP homes believe that a strategy based on a number of new settlements and on development on brownfield land is now required.	This is taken as support for a new settlement strategy. It is questionable whether 1000 is sufficient critical mass to provide the range of services required to make such communities independent of existing service provision.
AS.48.5	The condition of the land at Park Quarry (to the south of Drumoak) is ideal to engineer and design the most sustainable settlement to be built in Scotland.	Noted. Sustainability, while important, is not the only criteria that needs to be considered when identifying strategic areas for development. All developments should be pushing the boundaries of sustainability.

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AS.48.6	The physical relationship between different land uses (e.g. places of residence and places of work) is absolutely critical to sustainability. It will be important to determine how the spatial strategy minimises the need to travel.	Noted. We agree that minimising the need to travel must be seen as a significant consideration in the determination of a preferred spatial strategy.
AS.48.7	The functioning of the City Region - e.g. where housing and industry are developed - is vital to securing future prosperity.	Noted.
AS.48.8	It is likely that the new Strategic Development Plan will have to be more determinedly strategic than the current structure plan. It will have to take a longer term view and be more flexible - it should recognise the rate at which technological and socio-economic change is occurring.	Noted. It is intended that the new structure plan will be more strategic, flexible and take a longer-term view than the current plan.
AS.48.9	The answer to the question: 'which new development strategy should be adopted?' will be more of a technical than a political answer, given that the plan will undergo Strategic Environmental Assessment.	The choice of strategy will be made by the two Councils based on a wide range of information, including the views of communities.
AS.48.10	There is a strong belief that constraints on housing land supply have precluded the Aberdeen city region from moving forward as fast as it might otherwise have done.	Noted.
AS.48.11	Continuing to allocate housing land to those areas and settlements favoured by the current structure plan would result in settlements within the Aberdeenshire portion of the AHMA ballooning in size. This would have an adverse effect on existing infrastructure and facilities.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AS.48.12	The relatively high increase in house prices between 2001 and 2006 can be in part attributed to a lack of new completions available, and a rise in the number of households, over the same period.	Noted
AS.48.13	It is more likely that employment land will be needed for office and retail development, rather than to serve the needs of the oil industry. There is an emerging view that the requirements for employment land and infrastructure will continue to grow, even in spite of a gradual employment downturn in the oil and gas sector.	Noted. It will be important to provide a range and choice of locations to satisfy the diverse needs of businesses and industries. The amount of employment land sufficient to satisfy future needs, as well as aspirations for growth, will be determined by a technical appraisal and through engagement with communities and stakeholders.
AS.48.14	The most significant economic trend for the region is the emergence of Aberdeen as a centre for the knowledge economy - in particular, the emergence of the energy sector as an exporter of technical expertise.	Noted. The trend highlighted is significant for the growth of the economy, but other economic trends may also be significant for the distribution of future development across the region e.g. the growth of the service sector (e.g. tourism) and the decline of some of the region's traditional industries such as farming and fishing. The importance of the knowledge economy to Aberdeen City and Shire is recognised within the draft vision.

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AS.48.15	Existing settlements have limited capacity for expansion. This has to be recognised at some point, in order to prevent 'urban sprawl' over countryside areas. As such, alternatives must be considered for large-scale development.	Noted. We remain unconvinced that we have reached the stage where existing settlements have reached their capacity for expansion. The alternative to greenfield "urban sprawl" is brownfield development as new settlements of the scale likely to be required will create their own "urban sprawl". This statement is therefore taken as support for brownfield development strategies.
AS.48.16	The creation of new sustainable villages would be the most appropriate solution to the problem of the lack of development capacity within existing settlements.	Noted. This is taken as support for a "new settlements" strategy
AS.48.17	New settlements, created as sustainable villages, would encourage sustainable patterns of living through reducing the need to travel to Aberdeen. If appropriate facilities and employment opportunities are provided within the planned settlements, residents will not need to travel into Aberdeen with great regularity.	Noted. This is taken as support for a new settlement based strategy. However, the comment does not recognise the greater mobility in the employment market currently observed than in the housing market. People may change jobs without moving house negating any reduction in the need to travel.
AS.48.18	Public transport services would need to be up-graded, in order to serve new communities. This means that the most appropriate locations for sustainable villages would be on established transport corridors.	The importance of public transport links to new development is noted.
AS.48.19	It is of positive benefit that a structure plan that focuses on creating new sustainable villages (of at least 1000 homes in size) can be co-ordinated with the renewal of education facilities. It is unlikely that smaller developments will be able to achieve the critical mass necessary to cover the cost of providing for the new infrastructure.	Noted. The co-ordination of renewal of education facilities can be linked with any of the spatial strategies, and is not dependant on the creation of village developments.
AS.48.20	Public policy will be driven by what is stated in the Stern report and in Al Gore's film: "An Inconvenient Truth". It doesn't matter whether one believes the content of what is stated in either the report or the film - action is needed today.	Noted.
AS.48.21	The following developments are similar in certain respects to an envisaged sustainable village at Park Quarry: BedZED, Lightmoor, Dickens Heath, Espoo Housing Fair and Vikki (in Finland).	Noted
AS.48.22	Park Quarry would be a sustainable village, designed to minimise its carbon footprint, but also designed in keeping with the best traditions of a Deeside village (e.g. the layout of places such as Ballater, Aboyne and Kincardine O'Neil will inform the design of Park Village).	Noted. It is the emphasis in the issues report on design quality and sustainable development might suggest that all new developments would require to meet or exceed the standards proposed for Park Village.
AS.48.23	Live-work accommodation will be an essential element of the Masterplan proposals for Park Village, to reduce the potential for external trips and so contribute to the aim of providing development that reduces the need to travel. The masterplan could also maximise travel by sustainable modes - e.g. by incorporating local walking and cycling networks into the layout of the settlement.	The experience in Aberdeenshire of "live-work" development policies has been that they do not work particularly well and consequently will not make a significant contribution to reducing the need to travel. The detail of a live-work policy is a matter for local plans.
AS.48.24	Development at Park Quarry could offer an exclusive opportunity to apply sustainable transport ideas, to utilise a reliable and sustainable energy and water supply system, and to create a community with a distinctive sense of place.	Noted

Halliday Fraser Munro for FM Developments

Mr Steve Crawford

AS.63.1	The favoured spatial strategy should be sustainable in the wider sense of the word, have good access to transport networks, create some form of consensus amongst the wider population, create quality environments, should be locations that are physically able to be developed and should take advantage of south facing slopes.	The technical assessments of the possible strategies will include issues of sustainability, access and transport, and deliverability and marketability. The community engagement process we have undertaken will inform public consensus on the strategy. The creation of quality environments is detailed matters which are unrelated to the spatial strategy, they should be criteria which are applied to all proposals, irrespective of the strategy
AS.63.2	Growth in the next plan should be split 50:50 between the City and the Shire.	Noted. . The volume of development identified in each location should be based on sound planning principles, not political boundaries
AS.63.4	The majority of allocations should be made in locations that can offer a choice of means of transport, have sustainable and deliverable development sites, and offer an integrated development scenario that supports or improves existing infrastructure and services.	The need for sites to be accessible to public transport, and desirable to the development industry will be tested through the technical appraisal of the different strategies. We would agree that allocations would have to be capable of being integrated with existing development and support and improve services and infrastructure.
AS.63.5	A carefully planned high growth scenario is the most appropriate option for the City region.	Noted. This is taken for support for a high growth scenario.
AS.63.6	Locating new homes in locations where commuting can be encouraged to be more sustainable must be a core requirement of the spatial strategy.	Agreed. This will be tested in the technical appraisal of the strategic options.

Halliday Fraser Munro for Mr Michael Hickey

Mr Bob Reid

AS.45.1	The City has been performing better than expected in delivering brownfield units, but failing abysmally in providing greenfield house release. The underlying structural flaw in this picture is that virtually no family housing is presently being built within Aberdeen.	Noted.
AS.45.1	The structure plan contains a stronger Green Belt policy than the one which was proposed for the Green Spaces New Places Local Plan 2004.	Noted, but we will be seeking to review the current Structure Plan policy.
AS.45.2	The 2004 Local Plan has not resolved problems about how the 1991 Aberdeen Greenbelt had been designated and this has proved to be the heart of the current land supply difficulties in Aberdeen.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AS.45.3	The greenfield land at Causeway could be developed to address the problems associated with the shortage of family housing being built within the city region.	Noted. This is taken as support for a strategy of development within Aberdeen City, as an urban expansion.

Historic Scotland
Ms Lily Linge

AS.65.1	In general, we have no problems with the draft vision.	Noted.
AS.65.2	We are content that no key issues appear to be missing from the report.	Noted.
AS.65.3	We will be looking for compliance with national policy for the historic environment, including that in the recently published Scottish Historic Environment Policy series.	Noted. Detailed policies on built and cultural heritage protection and designation are likely to be considered in future local plans rather than this structure plan due to the strategic nature of the document. However, as the structure plan will be subject to a Strategic Environmental Assessment and any likely significant effects as a result of the spatial option chosen will be identified and remedial measures identified. Once the plan is approved, it will be monitored to identify any possible significant impacts and remedial action(s) required.
AS.65.4	We are unable to express a view on the various options outlined without further information on their likely implications for historic environment interests.	Noted.

Homes for Scotland
Mr David Horsfall

AS.70.1	The draft statement is not strong enough and does not appear to be planning for growth. The vision should not be taking an anti-oil industry approach by focusing on falling oil and gas production.	This view supports a re-wording of the vision to focus on the economic growth of the region. The vision does not however focus on falling oil and gas production - no mention is made in the draft vision of the future of the oil industry.
AS.70.2	The vision should plan for the future, encouraging new development and should provide a clear definition of economic development.	Noted. It will be important for the plan's vision to complement the vision for the economic development of the region, such as that provided in the Economic Growth Strategy of Aberdeen City and Shire Economic Forum.
AS.70.3	Aberdeen and Aberdeenshire should be promoted as the energy capital and economic development and a diverse local economy should be the focus.	Noted. This view supports a re-wording of the vision, to emphasise the economic development and diversification of the region and, in particular, to highlight the importance of the energy sector to the future regional economy.

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AS.70.4	The vision must be based on realistic aims and objectives, established from up-to-date forecasts on population growth, households and employment. These forecasts should underpin the plan. It is also important that the vision addresses any threat of decline by encouraging business to locate in the north east and by trying to consolidate its place in the energy market.	The vision for the structure plan is an aspirational, political statement. The aims and objectives for the plan will be drafted to reflect the vision and the issues that the plan should tackle, but also to remain realistic as to what can be achieved by the land-use planning system. Forecasts on matters such as population growth have a role to play in determining the feasibility of the possible options for the plan's development strategy - this strategy will itself seek to realise the vision as this has been expressed in the aims and objectives. The last statement on what the vision should do is noted.
AS.70.5	The structure plan should be developed in accordance with the national planning framework and should focus on growth rather maintenance.	Noted. This is taken as support for a growth scenario.
AS.70.6	The net migration out of Aberdeen needs to be reversed. Also more people will live across the whole area if this plan tackles the housing shortage through the provision of effective land, particularly in Aberdeen City.	The preferred spatial strategy arising from a series of consultations will determine where development is located over the next 25 years. The comment on the need for effective land is noted.
AS.70.7	If more land is allocated and is coupled with a realistic phased delivery, programme housing will be built in good time which will address need and demand and support economic growth.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development when it should be released and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AS.70.8	To ensure the growth of the economy, the plan must also take steps to attract further skilled employment to the area.	Noted. It will be important for the structure plan to provide for any growth in the regional population, should this prove desirable for purposes of attracting skilled workers to the area, or for other reasons associated with the growth of the economy.
AS.70.9	The plan should provide for all of the different elements of the population with a variety of house types in a variety of locations.	The local plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community. The preferred spatial strategy arising from the series of consultations will determine where most of the development is located.
AS.70.10	Consideration should be given to ensuring a range and choice through the provision of both high density flatted developments and mixed use communities on greenfield on the outer edge of the city.	The local plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community. The preferred spatial strategy arising from the series of consultations will determine where most of the development is located.
AS.70.11	The house building industry supports the regeneration of existing growth areas where it forms part of a growth strategy.	Noted.

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AS.70.12	Any regeneration which simply replaces existing housing stock should not be counted towards meeting the overall housing requirement.	Noted.
AS.70.13	Regeneration can make a positive contribution and create a community focus and has the potential to provide affordable housing in locations to a larger cross section of the population.	Noted
AS.70.14	It is important to release more greenfield sites within the City to allow a greater range and choice of house types and to ensure the retention of young families.	The local plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community. The preferred spatial strategy arising from the series of consultations will determine where most of the development is located.
AS.70.15	The green belt needs reviewing.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AS.70.16	There needs to be a clear direction on scale and the direction of growth from up to date forecasts that provide accurate household and population figures.	Noted
AS.70.17	Past experience has shown that historic build trends do not assist growth and we should not be planning for decline.	The preferred strategic option, which will arise after a series of consultations with communities and stakeholders and a technical evaluation by infrastructure providers, will stipulate the level of growth that will take place in the region for the duration of the new plan.
AS.70.18	The council should release a sufficient supply of land to ensure that housing is available for everyone.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. The local plan will take cognisance of guidance set out in SPP3 to ensure that a range of house types is needed to provide for the needs of all in the community.
AS.70.19	The housing requirement should not prescribe the mix of houses which require to be built rather there should be a range of housing opportunities which will meet product choice and mix and meet the demands of the population who may wish to live there.	The local plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community.
AS.70.20	A housing needs assessment should be undertaken to replace the current assessment prepared by Fordham Research Limited which has been argued is flawed.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document.
AS.70.21	It is important to set out the total number of Affordable Housing Units which are required in order that the plan can then monitor the progress towards the overall figure just the same way as an annual audit is done on housing land at the moment. The affordable housing provision should be a specific element of that audit.	Noted

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AS.70.22	Any design requirements should be realistic and should be developed in consultation with the house building industry and the detail of design should be addressed in Local Plans and Supplementary guidance.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.70.23	The maintenance and improvement of shopping in the centre of Aberdeen is supported, in particular, consideration should be given to ways of reinvigorating the west end of Union Street.	Noted. The structure plan is not, in itself able to reinvigorate particular areas but can provide a framework in which this can happen.
AS.70.24	The maintenance and improvement of shopping in towns and villages within Aberdeenshire is also supported and should be linked to an overall strategy of growth linked to the areas where land is released for development.	This support is noted
AS.70.25	The wording of question 2i appears to be anti-oil industry and planning for decline.	This was not the intention. The Issues Report was prepared to stimulate debate on the issues that the structure plan should consider. The text to accompany the issue of Economic Potential was drafted for such a purpose and not to indicate that the structure plan will take the view indicated. It is however noted that the draft vision does not specifically mention the oil-related sectors of the energy industry and as such may need to be changed, if it is widely thought that this is an oversight.
AS.70.26	It is a concern that the plan seems to be addressing economic uncertainty rather than economic expansion and stability.	It is thought that economic uncertainty will be an issue the plan has to deal with and the draft vision provides an indication of how the plan will seek to address this. This vision will be amended (if appropriate) in light of the consultation on the issues report and, with regard to the topic of the economy, will seek to reflect the aims and ambitions of the organisations involved in promoting the economic development of the region (e.g. ACSEF and the two Councils). The future objectives of the plan, when written, will explicitly state how the plan shall achieve economic growth and stability, in order to realise the vision.
AS.70.27	It is important that the plan has up to date forecasts to clearly identify the economic condition.	Noted.
AS.70.28	Land should be set aside for development in areas where there is a clear need and which are capable of meeting the sustainability agenda.	Noted. This approach fails to consider either opportunity provided by development, or the advantages of implementing a spatial strategy.
AS.70.30	Any new policy relating to economic potential must also recognise where there is no market for land which is allocated for employment and these should be promoted for alternative uses.	Noted. The allocation of land is a matter for local plans. The plan will be concerned with providing a sufficient quantity of marketable employment land. In SPP2, it is stated that employment land described as being marketable should serve business requirements - as such, the plan should seek to ensure that only land that can achieve this aim (amongst others) is allocated for employment purposes. It will be important to remember that if sites are not in demand due to servicing constraints, these sites can become marketable through (e.g.) improvements to local infrastructure.

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AS.70.31	Whilst it is recognised that there is a need to reduce the need to travel, it is hard for developers to accomplish this when relevant transport infrastructure is not in place.	Noted.
AS.70.32	There should be discussions with transport providers such as first group and network rail to see what they can be encouraged to do linked to the growth which the plan is forecasting.	The technical assessment of different possible strategies for the plan will involve liaison with groups such as Network Rail, to determine the feasibility of these strategies and also what would be needed, in terms of new infrastructure, to accommodate various levels of growth for each of them.
AS.70.33	The Aberdeen Western Peripheral Route and Cross-Rail project need to be agreed and a further strategy should be drawn up beyond this.	The Regional and Local Transport Strategies set the transport policies for the region, albeit in view of land-use planning goals and requirements. It will be important that the strategy of the structure plan continues to provide support for transport strategies envisaged over the next 25 years.
AS.70.34	Investment needs to be made in public transport services to encourage people to leave their cars.	Noted. One way of providing for additional investment in public transport services would be to adopt a land-use strategy for the development of the region that supports the increased use of public transport.
AS.70.35	Provision should be made to ensure that land is not simply allocated in areas where infrastructure capacity exists, but where people want to live and where there is housing need.	The preferred spatial strategy which will arise after a series of consultations and reviews by amongst others, infrastructure and service providers will determine where most development will be located throughout the region within a strategic allocation. A smaller allocation will also be made to reflect rural and local need. All of the spatial strategies take into consideration that infrastructure can only be provided if there is the necessary critical mass of development to fund the required improvements.
AS.70.36	Land should be allocated on a sufficient scale to addressing infrastructure deficiencies and to provide housing for everyone that needs it.	Noted. This is fundamental to the concept of "critical mass" of development.
AS.70.37	Rather than relying entirely on developers to fund infrastructure this is an opportunity for the councils to co-ordinate development with all infrastructure providers to ensure that infrastructure is operational in areas when required.	Noted. A technical evaluation of the spatial strategies will be undertaken with infrastructure and service providers to establish whether the spatial strategies can be delivered. This will allow infrastructure providers from an early stage to align their investment programmes accordingly.
AS.70.38	Any future policy relating to climate change should be led by national guidelines and should balance the need for growth and the environment.	Noted.
AS.70.39	Recognition should be given to the fact that the plan's area is wide and reducing the need to travel will be difficult.	Accepted. The challenges associated with making travel around the City Region more sustainable are great and may require confident and courageous decisions to be taken regarding the location of development.

AS.70.40	The plan must recognise that micro renewables are not necessarily appropriate for every housing development and we would oppose any policy that suggests that all housing developments must use renewable energy. Such measures would have a knock-on effect for house prices and the housebuilding industry is best placed to tackle the issue of climate change by reducing energy consumption through improved insulation technology.	Noted. Scottish Planning Policy 6 on renewable energy provides for part of the context for the way in which such issues will be addressed.
AS.70.41	Policies relating to climate change should take account of the economics and commercial viability associated with development and should not effect the delivery of housing.	Scottish Planning Policy 6 on renewable energy requires the reduction of carbon emissions through better designed developments (as does the revised Building Regulations), which will require proposals to use less energy (heat/power), and for any residue energy to be derived from cleaner, non-carbon emitting sources. All developments would be affected equally and this would therefore not impact on economic viability.
AS.70.42	Whilst managing the area's built, cultural and natural heritage, the plan must recognise that land will require to be released for development and that different and more modern designs may be appropriate.	Noted.
AS.70.43	The plan should ensure that the area continues to create heritage as it grows and moves forward.	Noted. This supports a focus on high quality design in new developments.
AS.70.44	The plan should direct development to specific growth areas and have a general policy covering development in other areas.	Noted.
AS.70.45	The plan should not prevent development in settlements which are not specifically named if there are good reasons for that development and it complies with the overall strategy of the plan.	Noted. Decisions on the distribution of development amongst settlements "unnamed" in the structure plan would be a matter for the local plan to address, in the context of the guidance provided by the structure plan.

HSE Chemical Industries

Dr. G A Cook

AS.53.1	The Servo Directive 96/82/EC, Article 12 requires land-use policies and procedures for implementing those policies take into account the relevant distances of establishments covered by the Directive. The Health and Safety Executive play an important role in the consultation process to ensure the risks are known to planning authorities. Further information can be found at www.hse.gov.uk/landuseplanning/padhi.pdf , as well as referring to the consultation zone library, which sites major hazard sites and consultation distances.	Noted, and the documents mentioned to will be referred to during the preparation of the structure plan.
AS.53.2	Where hazardous substances consent is granted (by the council), the Health and Safety Exec set the consultation zone for each one. Where such a consent is no longer used or required, councils should revoke the consent to minimise the area of land subject to development restrictions.	Although this matter is relevant in identify non-constrained sites, the revoking of hazardous substance consents is not a matter for the development plan.

Jenkins & Marr

Mr Roger Laird

AS.75.1 A strategic policy framework is required for major inward investment associated with the tourism industry Noted.

AS.75.2 We recognise the role of the city in accommodating much of the new housing in the area, but would advocate the development of a new transport corridor to the north of the city as an opportunity to revitalise the communities in this area. Noted.

Keep Grampian Beautiful Campaign

Mr Paul Miller

AS.15.1 More effort should be given to encourage new industry to create new jobs in order to reduce population decline. Noted. This is taken as support for a strategy which promotes employment land allocations as the driving force behind other development allocations.

AS.15.2 More needs to be done to establish and preserve water features, and increase tree and shrub planting. Detailed design standards of new developments are more appropriately addressed in local plans, but the comment is noted.

AS.15.3 More emphasis needs to be given to conserving sand dunes which are threatened by global warming and the rise of sea water. It is not the purpose of the structure plan to conserve sand dunes on their own, but rather secure their future where a new development is proposed. Natural heritage designations exist to protect and enhance important habitats and geological sites.

AS.15.4 Self building projects should be encouraged to help the low paid to generate property ladders. The Councils will take into consideration guidance set out in SPP3 and review how proposals for self-built housing and other small scale developments may help to meet local affordable housing needs.

AS.15.5 Not enough attention is being paid to increase in traffic levels. Noted. A strategy for the future land use development of the region could help address problems associated with the increase in traffic levels.

AS.15.6 Insufficient action is being taken to ease traffic congestion, especially at the Bridge of Don and Dee. Noted. The Local and Regional Transport Strategies set the transport policies for the region and it is in these documents that specific measures are suggested to tackle problems such as road congestion. The structure plan has a role to play in tackling such an issue, given that the distribution of land uses has effects on the use of transport networks. A strategy that supports particular measures likely to reduce traffic congestion (e.g. the Crossrail project) could help address the concern outlined.

AS.15.7	Encourage water power.	Noted. Design specifics, including the incorporation of renewable energy technologies are not appropriate for consideration in the structure plan.
AS.15.8	The exploration of Scottish mineral resources needs to be encouraged a lot more.	Noted. If the mineral needs of development are met using regional or national resources, the amount of energy used in their transportation can be reduced. In addition, economic benefits can be realised for the regional and national economy (e.g. jobs can be created, often in rural areas). SPP4: Planning for Minerals states that a key strategic aim for development plans is to provide policies and land allocations that do not prevent mineral working yet accommodate environmental and community interests; a technical assessment of possible strategies for the plan will allow this aim to be realised.
AS.15.9	Wherever possible, heavy lorries should be deterred from entering towns.	The Local and Regional Transport Strategies set the transport policies for the region and it is through these strategies that measures should be suggested, to tackle specific problems relating to freight transportation by road. The structure plan could however assist in addressing some of these problems, by suggesting a pattern of land-use that supports the transport of freight by other means e.g. by rail or sea. Increased use of such means of transport could lead to a reduction in the number of HGVs on the road.
AS.15.10	Where industry is located within a town, heavy goods vehicles should only operate during out-of-rush-hour times.	It is noted that this view relates to the effective management of motorised travel and to road safety - issues that the planning system should address. Controls over the operation of specific developments can be provided through the use of conditions, attached to planning permissions. It is not the purpose of a structure plan to offer detailed advice on how these matters should be dealt with.
AS.15.11	More action is required to get public utilities to work together before digging up roads and delaying traffic.	This is not a structure plan matter.
AS.15.12	Gaps in pavements are not being filled, which affect wheelchair users and those using walking sticks.	This is not an issue that can be addressed in the development plan. This is an issue for the councils maintenance teams.

Keppie Planning
Mr Gordon MacCallum

Aberdeen City and Shire Issues Report

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AC.3.1	The vision is consistent with the aims of CALA Homes (East) Ltd, to create sustainable new communities within transportation corridors.	The vision is a statement of aspiration for the region and not a statement that addresses the question of how development should be distributed. The aims and objectives for the plan will be drafted to reflect the vision and the issues that the plan should tackle; these will provide the land-use planning goals for the region, so as to facilitate the realisation of the vision. As the objectives have not yet been drafted, it cannot be said that they either conflict with or support the land-use strategy mentioned.
AC.3.2	We support the view that hard choices need to be made, to allow positive change. The Councils should work with key stakeholders to provide a long term vision that provides for both economic and sustainable population growth.	Noted.
AC.3.3	It is vital to maintain and grow the city region; in particular, it is important to reverse the decline in population of Aberdeen.	Noted
AC.3.4	Population decline in Aberdeen is likely to continue until 2021, if measures are not taken to address the lack of sufficient, effective housing land across the city. The Council should plan for growth over and above the GRO(S) projections for population.	This comment supports growth strategies.
AC.3.5	There is a shortage of affordable housing, as outlined by Aberdeen City Council's Housing Needs Assessment.	Noted.
AC.3.6	It is imperative that sites for housing development are brought forward in an effective manner. The Councils should encourage developers and landowners to commit to a delivery programme and resolve infrastructure constraints. There must be "buy-in" from both the public and private sector on the housing element of the plan, for the plan's wider objectives to be realised.	Agreed. This comment stresses the need for a consensus to be developed around the plan, in order for this "buy-in" to be realised.
AC.3.7	The plan must cater for an ageing population and for an increase in the demand for affordable housing.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document.
AC.3.8	If flats are concentrated in the centre of the city, this could provide sustainable accommodation (close to shops and services) for those requiring less living space. Greenfield land should be released on the outer edges of the city, in order to create new mixed communities for those requiring more space. This land should be near to public transportation corridors.	The specification regarding flats in the city centre is a local plan issue. Also we are currently carrying out a series of community and stakeholder consultations to gauge opinion on the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AC.3.9	The regeneration of urban institutions within the greenbelt can provide a community focus for new developments. If affordable housing is provided at such locations, a variety of people can live in attractive surroundings.	Noted. It is likely that specific policy on greenbelt will be a matter for local plans to consider. Redevelopment of institutional buildings in the greenbelt is unlikely to be of strategic importance.

AC.3.10	The comparative lack of development opportunities in the city has resulted in the growth of Aberdeenshire towns and villages. Areas that combine a city location but a village or community focus should be made available, to address the imbalance in development opportunities.	The support for development in Aberdeen City, in the form of cohesive communities, is noted.
AC.3.11	We think that it is important to retain a green space area around the city. The green belt should be reviewed by the structure plan; it should not block appropriate development. In particular, the inclusion of residential and education uses within the green belt should be reviewed, as suggested in SPP 21. Craibstone Campus could be sensitively developed even though it is currently within the green belt.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AC.3.12	The brownfield supply of land in the city has a role to play in providing a range of housing choices. It could be used to accommodate smaller households and the elderly. There is also a niche role for urban village type communities.	Noted.
AC.3.13	Developments should be designed to utilise the local character and natural features of a site. By adopting the urban village concept, quality residential environments can be created.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AC.3.14	We think that new housing areas should be located close to new employment areas; they should be linked with public transport initiatives on transport corridors, such as the AWPR.	Noted. The structure plan will be considering all forms of development and will be seeking to juxtapose homes and business with the aim of reducing the need to travel in line with national policy guidance.
AC.3.15	The Strategic Environmental Assessment approach, allied with a sequential test and comparative analysis of locations, is the appropriate way forward for deciding on where to locate development.	The approach proposed does not encompass the concept of "vision" for the area or of a spatial strategy to achieve such a vision, and instead would have us plan on the basis of a limited set of criteria. It raises the importance of environmental criteria above all others.
AC.3.16	The development strategy should focus on linking land-uses and providing opportunities for the creation of sustainable communities. Access to the countryside for leisure purposes will be important.	Noted.
AC.3.17	A quality, sustainable spatial strategy can be achieved through consulting and engaging with stakeholders in the initial stages of formulating proposals.	This has already been undertaken with stakeholders with an interest in business, housing, transportation and the environment. Community engagement of the strategic options has also been undertaken to find out residents and business views.

Kevin Murray Associates

Mr Kevin Murray

AS.71.1	We support the Councils' progressive ambition of "an exciting, modern and environmentally sustainable European City Region." In particular we support the themes of inclusion, environmental sustainability and fairness.	The support is noted
AS.71.2	We applaud the principle of being "confident and courageous when making the hard choices needed to allow change to happen"	The support is noted.

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AS.71.3	The vision cannot be delivered with continued depletion from the city of the economically active population with most choice. A new equilibrium is required to maintain the social and economic capital of the city, family and social networks, and reduce commuting.	This view supports a strategy for the development of the region that concentrates large quantities of housing development within the city.
AS.71.4	To deliver the vision requires a full range of 21st century living environments and lifestyle opportunities. Sustainable urban expansions would be an appropriate mechanism for delivering a core part of the joint vision	Noted. This is taken as support for a strategy which would see development in Aberdeen City in the form of major urban expansion.
AS.71.5	The following addition to the vision is proposed " Our communities will include everybody and enjoy the highest quality of life and lifestyle choice across the whole area , both within the city and outside it.	Noted.
AS.71.6	Even a static population will require more homes.	Agreed. The strategic forecasts consider this in reaching the housing requirement
AS.71.7	It is the retention and growth in the city of those who are economically active and can exercise choice that we need to keep. The scenario of Urban poor- Country Rich is socially and economically divisive, would have negative implications and would be difficult to reverse.	Agreed. The issue of balance is one threat the Structure plan needs to address.
AS.71.8	Planning is required at a neighbourhood scale to address community needs and facilities. Distinctive, liveable neighbourhoods for all should be at the heart of delivering the vision.	The scale of allocations likely to be required lends itself to this kind of approach, although it would be up to Local Plans to deliver neighbourhood scale developments.
AS.71.9	Regeneration of existing neighbourhoods is an important part of modernising the city. It will not, however provide sufficient housing land quickly enough, or hold all the economically active population. Complementary options are required to provide the quantum of new houses and facilities.	Noted. The strategic implications of regeneration are significantly wider than just its impact on affordable housing and diversion of funding. Regeneration can make a significant contribution to achieving the aims of the vision for the plan.
AS.71.10	Regenerated areas should pursue an integrated tenure approach to provide the most robust long term housing stock and neighbourhood flexibility for the city region as a whole.	Noted. This is a local plan issue
AS.71.11	There is a potential contradiction between the "confident and courageous" approach identified in the vision and the text of this section. Local needs and hopes of those lobbyists already well served may be for no change, only to the disadvantage of the less well off.	Noted. This point is well made, and the risk identified will be guarded against.
AS.71.12	There is a need for a range of stronger, liveable communities, at least some of which should be in the city, of a scale that can deliver a range of community benefits .	Noted. This supports a strategy of development in both Aberdeen and Aberdeenshire, and in a form which provides sufficient mass to allow these new communities to be created.
AS.71.13	A reorientation is required that aims for balanced growth linked to localised employment, seeking to minimise commuting. We should be moving away from the idea of dormitory towns and suburbs.	Noted. This supports the "growth pole" strategy. The support for employment led growth is noted.

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AS.71.14	Reassessment of the green belt requires to include future policy and purpose, as well as extent. There is a need to communicate the concept of "green belt" as a temporary spatial structuring instrument, not a blocking mechanism, or a permanent designation.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The lifetime of the green belt under Scottish Planning Policy 21: Green Belts is 20 years, which reflects the lifetime of the structure plan. Future boundaries will be drawn to reflect the spatial option that will be adopted in the plan.
AS.71.15	Reconsideration of greenbelt in the Grandhome / Whitestripes area should be considered without over simplistic demarcation by field boundaries. The final articulation of boundaries should be based on good placemaking design	Noted. These are issues for a local plan to address.
AS.71.16	We support the aspiration for good design in the creation of attractive contemporary living environments which will have an enduring attractiveness over at least a century or more. The Structure Plan should reinforce the need to produce masterplan frameworks, design briefs and design codes where necessary.	Noted.
AS.71.17	The structure plan requires to emphasise the need to produce attractive distinctive neighbourhoods at a Scottish level.	This is a role for the National Planning Framework, not the Structure Plan.
AS.71.18	While endorsing the need to support the role of existing shopping areas there is a need to include shops as part of mixed use local community provision	Noted.
AS.71.19	We support the forward looking approach to economic development beyond narrow dependency on the oil industry but would caution against reliance on large scale employers. We would encourage the use of integrated employment and service activity in neighbourhoods, particularly where this is compatible with residential uses as these strengthen the attractiveness of these areas, bring employment choice and can reduce the need for commuting.	Noted.
AS.71.20	We support the aspiration to embrace a range of transport modes. Location of development and public transport need to creatively use the enhanced transport network once the AWPR and Third Don Crossing are implemented.	Noted. A creative use of the enhanced transport network could be taken to involve locating development so as to maximise the improvements in journey times for businesses and communities, or perhaps to provide for an increased use of sustainable modes of transport and park and ride facilities involved with the enhanced network.
AS.71.21	We support the importance attached to this in the issues paper. The plan should progress capacity and network thinking rapidly in a manner that supports and integrates with proposals for new land releases and development on brownfield areas.	Noted
AS.71.22	We support this objective and its implications, including avoidance of flooding, integration of SUDS, capturing renewable energy and minimising long distance commuting.	Noted.
AS.71.23	We support the aspirations on heritage.	Noted.

AS.71.24 We strongly believe that the Grandhome / Whitestripes area fit well with the new spatial geography that will apply once the AWPR and Third Don Crossings come into play This comment supports an urban expansion to Aberdeen City

Kincardine Estate
Mr Andrew Bradford

AS.27.1	From the existing practices of the City and Shire, it is difficult to believe that such radical changes can be delivered by the plan. For example, economic growth appears to be at the expense of the environment (e.g. the large scale development at Arnhall Business Park, Westhill, which is increasing levels of light pollution, from street lights in the countryside).	Noted. The last line in the draft vision acknowledges that the Councils will need to make hard choices, to allow the vision to be achieved. A co-ordinated effort, from all involved in shaping the future of the region, will be required.
AS.27.2	The Councils need to rectify existing practices and bring offenders to book before the respondent believes that the content of the Vision statement are more than just words.	The development plan for the region - of which the structure plan will be a part - is a critical tool in the management of development. It should be noted however that it looks forwards, rather than backwards. The new plan will be more clearly focused on delivery against a vision than previous plans have been.
AS.27.3	There is very little in the 'planning' process to rectify the mistakes of the past (e.g. to have a long-term planning goal to remove sites from flood-affected areas, which were previously granted planning permission, such as caravan sites).	The councils are well aware of sites at risk from flooding, and flood management schemes/proposals are being considered at present, which will filter into the development plan, where relevant.
AS.27.4	The plan ought to be seeking to reduce the overall level of light pollution, not adding to it.	Noted. The issue of light pollution is not an issue for the vision to consider.
AS.27.5	In order to safeguard resources, it would be better to plan for a managed decline of the areas population, and to see that as an advantage - higher standards of living, and less pressure on housing and land etc. Although, an increase in population in smaller settlements might (not) be necessary to sustain basic services.	This is taken as support for a "low growth" strategy for the city region, with an emphasis on meeting local needs
AS.27.6	Fit elderly people should be encouraged to continue to work. Elderly people could also be encouraged to stay in their own homes or in their own communities with better care provision, which is easily achieved with modern I.T.	This is not a structure plan issue.
AS.27.7	Regeneration is important.	Noted.
AS.27.8	Through the granting of planning permissions for supermarkets and out-of-town shopping facilities have adversely affected local services. Although supermarkets create jobs, they have also taken away more local jobs than they create. Furthermore, it is environmental unsound to have out-of-town supermarkets as they encourage more car journeys, where previously much of the shopping could have been done on foot.	Noted. Current policy only supports out of town supermarkets where there is no capacity in existing centres and the new facility will not have an adverse impact on town centres. Supermarkets are commonly seen as qualitative improvements to shopping facilities, providing a wider choice and convenience.

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AS.27.9	A truly sound planning policy should be seeking to minimise the impact of development everywhere. Green Belts should not allow inappropriate development further into the country.	Green Belts exist to manage development of a city/town in the long term, and have at least a 20 year life span. The role of the Green Belt in Aberdeen will be reviewed in light of the revised planning guidance (Scottish Planning Policy 21).
AS.27.10	I agree with most of the statement, but a more robust approach is required to reflect those who do not live in a house, such as travellers.	Noted. The plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community.
AS.27.11	Design is hugely important, but local vernacular and vision has been lost in current housing developments, which all look the same as everywhere else. Poundbury is a good example of a mixed use development, which leads to a reduction on traffic mileage and an improved society, and reflects local architectural traditions.	Aberdeenshire Council has been working with Robert Gordon University to overcome the issue of poor design and energy intensive residential developments. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.27.12	The granting of planning permission for out-of-town supermarkets/facilities has adversely affected local services, and led to more job losses than what has been created. What is being done about reducing out of town shopping centres?	National policy is being applied to strengthen town centres. Local plans will identify deficiencies and needs in existing centres and will make appropriate land use allocations to support town centre retailing.
AS.27.13	With the presence of oil, other older traditional activities have been forgotten about, such as field sports and game fishing, which sustain hundreds of rural jobs.	Noted. The structure plan will address the land-use implications of providing for rural economic development, from a strategic perspective - that is, from the point of view of the long term development of the region as a whole. The plan's likely implications for rural employment will be identified and considered in the technical appraisal of possible strategies (see Table 1 in the Development Plan Scheme).
AS.27.14	Public transport only works effectively when there is a frequent service, which means you do not need to refer to the timetable (i.e. you know that a bus or train will be along shortly, such as the London Underground).	Noted
AS.27.15	Public transport only works effectively as a replacement for cars only where there is a high density of population or between areas of high population. As a result, in the less populated areas, the car should be seen as a vital component of the transport system, and better use should be made of it, such as car sharing (using IT software). The councils should facilitate such as scheme.	Noted. The Regional and Local Transport Strategies set the transport policies for the region - measures to promote car sharing have been included in the Regional Transport Strategy for the area.
AS.27.16	Public transport only works effectively as a replacement for cars only where there is a high density of population or between areas of high population. As a result, and due to the removal of most of the rail tracks in the less populated areas, the car should be seen as a vital component of the transport system, and better use should be made of it, such as car sharing (using IT software). The councils should facilitate such as scheme.	Noted. A series of consultations are currently being undertaken to establish preferences on various spatial strategies. Some of these spatial strategies propose the critical mass of development that would be required to fund a new railway. All of the spatial strategies have taken into consideration guidance set out in SPP 17 which aims to provide the opportunity for people to use more sustainable forms of transport. The Councils, through NESTRANS do facilitate car sharing.

AS.27.17	There is a need in the plan to define just how the 'new and better facilities' are to be provided. Water extraction from the River Dee has increased, but the environmental impacts have not been 'planned away'. Little has been done to deliver long-term infrastructure solutions to tackle the environmental impact of water supplies. Is this plan going to make a difference?	Noted We are currently liaising with SEPA and Scottish Water on this issue. The structure plan will take cognisance from these liaisons and will seek to ensure that appropriate infrastructure is provided for new development to avoid impacts.
AS.27.18	The impact of climate change is happening already - the River Dee has seen an increase in the frequency of both large spates and periods of very low river flow since the 1970s. Improvement to infrastructure to reduce the environmental impacts of extracting water from the river needs to be undertaken.	Noted.
AS.27.19	Managing heritage 'resources' in the long-term creates a financial burden on the owners of, for example listed buildings, who receive little help, and are further hindered by the lengthy planning process, which in other circumstances for certain proposals would be considered as 'permitted development' (e.g. replacement windows).	Noted, but this is not a structure plan matter.
AS.27.20	The structure plan should mention how it will deliver adequate policing, because if there is not an orderly society, then all the proposals in the structure plan will come to nothing.	The structure plan takes account of the respective community plans, which includes input from a number of partners, including the police. Grampian Police are also involved in the technical appraisal of options which will identify implications for service delivery and how these could be addressed. Reducing crime through improved designs and layouts, as set out in Planning Advice Note 77: Designing for Safer Places will be implemented in the next local plans, which the PAN identifies as the most appropriate means of setting out specific crime prevention policies.
AS.27.21	The council should ensure that any waste to energy schemes proposed use the heat as well as the electricity that is generated, which would require such plants to be close to settlements, rather than out in the country.	Noted

MBM Planning and Development Consultants Ltd

Mr Mark Myles

AS.3.1	The next structure plan should place a greater emphasis on the promotion of appropriate, small-scale opportunities for housing in the countryside.	Noted
AS.3.2	Policies on housing in the countryside should recognise the importance of individual site circumstances, in defining a cohesive group of houses.	Individual houses in the countryside are not a strategic issue.
AS.3.3	Recent Scottish Executive guidance should be taken into account in defining a policy approach to housing in the countryside. Such guidance may be found in SPP3, SPP15 and PAN72.	The new structure plan will take notice of the recent Scottish Executive Guidance.
AS.3.4	NEST Policy 12 does not provide rural housing opportunities in the Aberdeen Housing Market Area but does provide limited opportunities in the Rural Housing Market Area; this creates an imbalance that appears to be unjustified.	Noted.

AS.3.5	There is a need to provide a policy that does not create an unjustified imbalance in the provision of housing in the countryside across the structure plan area. This policy should be more welcoming to housing in rural areas, given recent Scottish Executive guidance contained in SPP3, SPP15 and PAN72.	Noted. The plan will take cognisance of recent Scottish Executive guidance contained in SPP3, SPP15 and PAN 72. Most of the development will be allocated to land within the preferred strategic option which will arise after a series of consultations. Some development will also be allocated to land to meet local and rural needs.
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Muir Group
Mr John Evans-Freke

AC.7.1	Generally support the draft Vision as presented.	Noted.
AC.7.2	We question the emphasis of shopping exclusively on the maintenance and strengthening of existing centres. The distribution of shops should adjust to any changes in the distribution of housing.	There is a clear difference between shops designed to meet a local need and shops which have a sub regional catchment. National policy requires that sub regional shops are directed to town and other retail centres. Over the life of the plan new local centres are likely to be created to serve expanding communities.
AC.7.3	Broadly agree with the approach put forward on the other issues and do not consider that there are any significant omissions.	Noted.
AC.7.4	There is a quantitative need for much greater housing land release and a qualitative need for the release of land of the right type and in the right location, so that all segments of the market can be properly addressed.	Noted. This supports a "high growth" strategy supported by a technical evaluation of marketability and feasibility.
AC.7.5	There is no realistic prospect of the City being challenged as the economic engine for the wider area, and as the focus for jobs, services and public transport, and in the interests of achieving sustainable solutions, it will be essential to maximise the capacity of the City to support new housing developments, particularly family housing.	Noted. This is taken as support for a strategy which promotes significant development within Aberdeen City
AC.7.6	The neglect of building family housing in the city calls for a long term response by way of strategic greenfield land release, without impacting adversely on quality of life issues.	Noted. We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Strategic allocations for housing land shall then be made accordingly.
AC.7.7	Given the strategic focus on employment expansion in the area south of Cove the area to the south of the City should be a particular focus for new community development, with particular emphasis on family housing.	This proposal supports development along the transport corridor, but with the emphasis of building a new settlement in the area south of the City.

NESTRANS
Mr Peter Cockhead

Aberdeen City and Shire Issues Report

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AS.73.1	At 172 words, the vision is far too long. It is recommended that a short vision be adopted, preferably with a link to the vision of the Regional Transport Strategy.	Noted.
AS.73.2	The plan needs to consider how the population will be maintained in each community. The growth of the population in some parts of the region, together with a chronic decline in other parts, is the key issue.	Noted. The plan will allocate land so that there is a balance between local and strategic needs.
AS.73.3	The issues report should have discussed ways of addressing any future demographic changes, such as maintaining balanced communities.	Noted
AS.73.4	It is naïve to assume that Aberdeen city is a single entity. Imbalances within the city are as pronounced as imbalances between the needs of rural and urban communities. The structure plan needs to recognise inequalities between communities.	Noted. A vision for the city region will have to recognise the internal character of Aberdeen City. There are limits to the influence of the land use planning system on the resolution of inequalities within the City.
AS.73.5	The Green Belt is important and should be reassessed to ensure that it guides development, rather than constrains it.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt has yet to be undertaken.
AS.73.6	The photograph in the Issues Report (above the design section) is inappropriate, for it gives total prominence to the car. Car parks that dominate developments not only harm visual aesthetics, exacerbate flooding and run-off issues, but also perpetuate the myth that authorities are planning only for car access.	Agree. The photograph does not adequately reflect the thrust of issues f (housing), g (design) and j (transport)
AS.73.7	The Issues Report should emphasise the idea of appropriate scale and location of retail development. It should also emphasise the threat to centres posed by out-of-town car-dependent development.	Noted. These are aspects of national retail policy. Out of centre retail proposals have to demonstrate accessibility to their catchment by non-car modes and so should never be "car - dependant". National policy recognises the threat to town centres from out of centre proposals.
AS.73.8	The structure plan has a role to play in directing employment development to appropriate locations and in ensuring services, including access by a choice of travel modes.	Agreed.
AS.73.9	The key strategic point for the plan regarding transport is to improve connectivity - reducing the need to travel and encouraging mode shift are secondary or otherwise contribute to this. The role of the structure plan in supporting the Regional Transport Strategy should be made clear.	The view that improved connectivity is of utmost importance is noted. SPP 17 states that Regional Transport Strategies are to be co-ordinated with structure planning, not that structure plans are to support these documents. The next structure plan is to provide a vision and strategy for the development of the region over a period of 25 years from its adoption; the finalised Regional Transport Strategy does not extend beyond 2021. As such, it would be inappropriate for the vision and strategy of the plan to follow the lead of the Regional Transport Strategy. It is agreed that the transport policies for the region will be important considerations for the next structure plan.
AS.73.10	There are a number of factual mistakes in the document. In addition, there are a number of confusing statements and tables. These should be addressed.	The Report of survey has been developed from existing data sources . Many of the detailed criticisms are valid and will be considered again if or when an updated report of survey is produced.

NFUS Scotland

Mr Ross Williams

AS.54.1	The agricultural industry is an integral part of the rural economy. Agriculture is closely linked with other rural land uses and these links need to be strengthened. Other forms of income generation are required in rural areas to support the rural economy.	The need to maintain the rural economy is noted
AS.54.2	Rates of development should be similar to those currently observed, and with some early development to ensure that sub structures are adequate for all the development.	This supports the strategic option of "medium growth" and "front loading"
AS.54.3	The city should not be the focus for the new plan. Agriculture is the mainstay of the area and should be treated in this way.	The city has to be considered as part of the strategic development of the region. The emphasis given to rural areas is a question of balance, and this view clearly supports a balance towards rural areas
AS.54.4	A clear understanding between the thirteen issues identified and farming in rural areas is vital	Noted.
AS.54.5	Decreasing numbers of jobs and unaffordability of housing is decreasing rural population	Noted. Providing opportunity for economic development and addressing the affordability of housing are two key issues for the plan to address.
AS.54.6	An ageing population in rural areas must be addressed by providing opportunities for development. Economic change within the agricultural sector will influence the need for modern affordable accommodation and services to maintain healthy, vibrant communities.	Noted. This comment suggests a development strategy which promotes development opportunity as a means of promoting vibrant rural communities. This is similar to the current strategy, with the exception that economic development is identified as needing to be supported by housing.
AS.54.7	The opportunities for alternative business development and diversification should be recognised in the Structure Plan	Noted. These are issues which may be more appropriately considered in the context of future local plans.
AS.54.8	Tourism is not mentioned. The development of sustainable tourist facilities and activities will be influenced by land use and availability, and the development strategy in the plan.	It is noted that the draft vision does not make specific mention of the importance of Tourism to the region. The development strategy of the plan will be of central importance in determining the future development of land across the region and so on the broad distribution of facilities and services.
AS.54.9	The structure plan needs to take account of national and regional strategies on enterprise, rural development and sustainable development	Agreed.
AS.54.10	More housing development opportunities are required on farms	Noted

AS.54.11	Development rules require to be sufficiently flexible to allow for diversification of on farm enterprises	Noted
AS.54.12	The plan has to be sufficiently flexible to allow for the development of biomass energy plants to allow agriculture to become an enegy producer for the future	Noted.
<p>NHS Grampian Mr Gerry Donald</p>		
AC.2.1	The inclusion and reference to Healthcare, and to the importance and accessibility of these services, is welcomed.	Noted.
AC.2.2	The North East needs to raise the bar and be ambitious for the area if the region is to achieve the vision.	Noted.
AC.2.3	Although not everyones desires will be satisfied, the plan must be sustainable and well thought through, which will seize economic advantage to the benefit of the majority.	Noted. This comment suggests that the vision should be more realistic in its ambition to include everyone, with regard to future economic prosperity.
AC.2.4	A skills/workforce analysis should be undertaken, which may require the population to grow to sustain the vision. Healthcare needs to be part of that outcome to ensure the area attracts and retains the much needed healthcare expertise to support the region.	With exceedingly low regional unemployment rates it is not felt that a skills / workforce analysis is required, all kinds of skills will be demanded if economic growth and diversification are to occur. The comment is taken to support growth of population.
AC.2.5	The population is likely to age with fewer people of working age. NHS Grampian will need to plan their resources in parallel to any proposals outlined in the structure plan.	Noted.
AC.2.6	Deprivation remains a real concern in Aberdeen and Aberdeenshire. Regeneration provides an opportunity to improve upon communities and individual needs, and if planned accordingly should see visible health gains.	Noted
AC.2.7	The proximity of Aberdeen to the rural area (and vice-versa) in terms of travel time is a real attraction of the area.	This comment proposes that good access to rural and urban environments contributes to a high quality of life.
AC.2.8	More land for affordable housing needs to be released in Aberdeen.	The councils in conjunction with private developers and housing agencies, shall seek to secure appropriate levels of affordable housing. The means and general level of provision will be outlined in local plans and determined by area housing needs, and the location, marketing considerations and suitability of sites.

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AC.2.9	There should be an affordable housing policy, developed through the local plan process, and supported by a housing needs analysis, which is regularly updated during the life of the plan(s).	The structure plan will set out from the information available, including levels of need, local house prices and likely building rates, the appropriate level of affordable housing. The local plan will identify the appropriate sites for these allocations. Local Housing Strategies will provide information on housing need.
AC.2.10	Design should respect the traditions of the area, but not at the expense of economic development.	The comment is noted, although specific design and built heritage (conservation) matters are more appropriately considered in the context of the next local plans.
AC.2.11	Contemporary design should be encouraged, and there needs to be an acceptable balance between 'old' and 'new' designs in the future.	The comment is noted. These are issues more appropriately considered in the context of the next local plans.
AC.2.12	In order to be sustainable as a region, land should be set aside for industrial use in key areas adjacent to the main road networks.	Noted. The location of business and industrial development is an important consideration and in many cases, connection to the strategic road network (trunk roads such as the A90 and A96) is advantageous to remain competitive. Equally though, it will be important to secure reliable journey times between the region and other areas; negative impacts on the road network should be minimised. The plan should ensure that there is sufficient land available in a range of locations, to suit the diverse needs of different industries and businesses.
AC.2.13	Aberdeen and Aberdeenshire to be recognised as a global market leader in the oil and gas sectors.	Noted. This sentiment is not repeated within the draft vision, where emphasis is placed on the renewable energy sector. The view supports a re-wording of the vision, to focus on other sectors of the regional economy.
AC.2.19	Any 'settlement plans' produced should show the appropriate location for the availability of healthcare services; preferably in a location central to the community, with good visibility and accessible by public transport.	This is a local plan issue as local plans set out the appropriate locations and different types of development that could be within or around a settlement.
AC.2.20	Identify flood zones to protect potential flood affected areas outwith built up areas.	Noted, although site specific flood management is largely a matter for the local plan.
AC.2.21	Embrace renewables, and demonstrate the region as global leaders in renewables, as well as demonstrating geographically the benefits.	This is a key element of the draft vision for the area.
AC.2.22	As it is important to retain much of the heritage of the area, a balance requires to be found to ensure we progressively look towards the Vision, which will inevitably require a contemporary approach.	Noted.
AC.2.23	Healthcare facilities should be as central to communities as possible, which will require a review of how communities are planned to grow if we are to actively promote a green transport strategy.	The need to consider the long term needs of communities as they grow suggests the need to embrace a long term "masterplanning" approach to new development

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AS.13.1	Welcome the inclusion and reference to healthcare as well as the importance and accessibility to these services.	Noted.
AS.13.2	The North East needs to raise the bar and be ambitious for the area if the region is to achieve the vision.	Noted.
AS.13.3	Although not everyones desires will be satisfied, the plan must be sustainable and well thought through, which will seize economic advantage to the benefit of the majority.	Noted. This comment suggests that the vision should be more realistic in its ambition to include everyone, with regard to future economic prosperity.
AS.13.4	A skills/workforce analysis should be undertaken, which may require the population to grow to sustain the vision. Healthcare needs to be part of that outcome to ensure the area attracts and retains the much needed healthcare expertise to support the region.	With exceedingly low regional unemployment rates it is not felt that a skills / workforce analysis is required, all kinds of skills will be demanded if economic growth and diversification are to occur. The comment is taken to support growth of population.
AS.13.5	The population is likely to age with fewer people of working age. NHS Grampian will need to plan their resources in parallel to any proposals outlined in the structure plan.	Noted.
AS.13.6	Deprivation remains a real concern in Aberdeen and Aberdeenshire. Regeneration provides an opportunity to improve upon communities and individual needs, and if planned accordingly should see visible health gains.	Noted. The plan will take cognisance of guidance set out in SPP3 which states that redevelopment in existing neighbourhoods can support the wider regeneration of these areas, by providing greater choice in terms of housing type and tenure, as well as high quality residential environments.
AS.13.7	The proximity of Aberdeen to the rural area (and vice-versa) in terms of travel time is a real attraction of the area.	This comment proposes that good access to rural and urban environments contributes to a high quality of life.
AS.13.8	More land for affordable housing needs to be released in Aberdeen.	Noted. The local housing strategy will outline the need for affordable housing and the structure plan will draw on this information.
AS.13.9	There should be an affordable housing policy, developed through the local plan process, and supported by a housing needs analysis, which is regularly updated during the lofe of the plan(s).	The local housing strategy will provide the evidence for the need for affordable housing while the structure plan will indicate the scale and general location of any shortage of affordable housing.
AS.13.10	Design should respect the traditions of the area, but not at the expense of economic development.	This is an issues more appropriately considered in the context of the next local plans.
AS.13.11	Contemporary design should be encouraged, and there needs to be an acceptable balance between 'old' and 'new' designs in the future.	These are issues more appropriately considered in the context of the next local plans.

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AS.13.14	We need to secure the long term base of the oil and gas sectors in Aberdeen and Aberdeenshire if the region is to remain as a global market leader in these sectors.	Noted. This view relates to the effective management of the economy, to respond to the economic challenges that lie ahead. As such, it is of specific relevance to an economic growth strategy (a type of document that is produced by Aberdeen City and Shire Economic Forum), rather than to a land-use development plan. It will however be important for the structure plan to support the economic vision for the area e.g. by providing a vision for development that is economically sustainable.
AS.13.15	We should seize economic opportunities and diversify into to new industries, whilst building up on the oil and gas sectors.	Noted. This view relates to the effective management of the economy, to respond to the economic challenges that lie ahead. As such, it is of specific relevance to an economic growth strategy (a type of document that is produced by Aberdeen City and Shire Economic Forum), rather than to a land-use development plan.
AS.13.16	Should provide a Green Transport Strategy for the area, which shows what the councils will be doing to promote walking, cycling, and the use and availability of public transport.	The Local and Regional Transport Strategies set the transport policies for the region and it is through these strategies that the Councils should demonstrate a commitment to encouraging the use of sustainable modes of transport.
AS.13.17	Substantial improvement in walking, cycling, use and the availability of public transport is required in some areas of Aberdeen.	The Local and Regional Transport Strategies set the transport policies for the region and it is through these strategies that measures should be suggested, to tackle specific problems relating to deficiencies in the provision of transport-related services and facilities. If future transport strategies are developed in view of the pattern of development suggested by the structure plan, the plan can help to minimise any future problems in the availability of (e.g.) public transport.
AS.13.18	Significant challenges lie in linking up Aberdeenshire settlements with one another and with improving access to Aberdeen, which is vital to improving access to healthcare services.	Noted. The location of large-scale future development relative to healthcare services, and the distribution of such development across the region, are important factors for improving access to these services. Local and Regional Transport Strategies can also address problems relating to the connectivity of settlements within the region.
AS.13.19	Any 'settlement plans' produced should show the appropriate location for the availability of healthcare services; preferably in a location central to the community, with good visibility and accessible by public transport.	This is a local plan issue as local plans set out the appropriate locations and different types of development that could within or around a settlement.
AS.13.20	Identify flood zones to protect potential flood affected areas outwith built up areas.	Noted, although site specific flood management is largely a matter for the local plan .
AS.13.21	Embrace renewables, and demonstrate the region as global leaders in renewables, as well as demonstrating geographically the benefits.	This is a key element of the draft vision for the area.
AS.13.22	As it is important to retain much of the heritage of the area, a balance requires to be found to ensure we progressively look towards the Vision, which will inevitably require a contemporary approach.	Noted.

AS.13.23 Healthcare facilities should be as central to communities as possible, which will require a review of how communities are planned to grow if we are to actively promote a green transport strategy.

The need to consider the long term needs of communities as they grow suggests the need to embrace a long term "masterplanning" approach to new development

Optimus Aberdeen

Mrs Lesley Munro

AS.23.1 When developing the local plan it should be taken into consideration that residents of rural service centres do not want to be 'swamped' by an invading housing estate, particularly Kirkton of Skene which seems to be constantly under threat from Westhill.

This is a local policy issue and inappropriate for the structure plan.

AS.23.2 Preservation of the status and rules of Rural Services Centres is a must to preserve our heritage and way of life

Noted.

Paul & Williamsons for Barrat Homes

Ms Elaine Farqharson-Black

AC.12.1 The councils do not define the size they wish the population of the area to be. This should be the target, rather than a needs basis. Past trends could be used to establish the population and base housing allocations.

This issue of "how big" is a key question for the Structure plan, and one on which views are actively being sought. It would be improper to state such a target when there has been no public debate on this issue

AC.12.2 There is confusion in the published documents as to the time period to be covered by the new plan.

No decision has been made on this before the publication of the draft plan. The published documents refer to 20+ years and 2030 as an indication of a longer planning horizon.

AC.12.3 Why does the plan need to be prescriptive and include consideration of phasing? These cannot be sensibly established before the aims and objectives of the plan are determined. It is important that development is not constrained by artificial time constraints

Noted. A 25 year timespan has been advised for strategic plans by the Scottish Executive and represents a time sufficiently far into the future to allow real change be imagined. The mechanism used to release land in "phases" will be a key issue for this plan.

AC.12.4 The city requires to stabilise decline and encourage people back into the City. Low housing allocations in the past have had the direct result of adding to an already declining population. The plan needs to reverse the past trends and plan for growth.

Noted. This supports a strategy for development in Aberdeen City.

AC.12.5 The vision for the plan is planning for a decline in the economy with particular reference to Oil and Gas. The vision should not be about maintaining what we have, but encouraging growth and expansion.

The need to diversify away from oil and gas is a prudent approach to take for the long term. Questions about whether the area is maintained or grows are being asked in the context of the strategic options.

AC.12.6 The report of survey relies on historical and outdated information

The report of survey uses the most up to date information available at the time it was prepared (early 2006). If a new report of survey is produced, the statistics will be up-dated .

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AC.12.7	The councils may be preparing a plan with an inadequate number of houses required to address current difficulties.	The level of housing promoted is the subject of our engagement on the "strategic options"
AC.12.8	Efforts need to be made now to grow the whole area and release of greenfield land in the City and Shire is essential.	Noted. This is taken as support for a growth scenario
AC.12.9	The greenbelt review is essential to allow for communities to expand and encourage economic growth.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AC.12.10	There is a great deal of difference in terms of the potential to make developments "sustainable" between the City and the Shire. Recognition is required of the difference in Aberdeenshire and the dispersed nature of settlements.	Noted.
AC.12.11	One of the main issues for the area is the AWPR and the plan will have to clarify its role in relation to releasing development land	Noted.
AC.12.12	Sufficient land requires to be released to create a co-ordinated approach to the provision of infrastructure.	Noted. This is fundamental to the concept of "critical mass" of development
AC.12.13	The hierarchy of settlements in NEST is insufficiently flexible, the new plan should not be so prescriptive.	Communities and businesses benefit from certainty while there is a need to retain flexibility to accommodate change.
AC.12.14	The figure in the Issues Report of 250 ha of brownfield land coming forward for housing in the plan period is incredible. Reliance on brownfields land cannot ignore the need to allocate greenfield land to support the growth of the area.	Noted. There is no reference to a figure of anticipated brownfield land release in the issues report
AC.12.15	In order to allow delivery, both Councils must recognise and devise policies which are robust and defensible against those who would oppose development in any part of there area, they must be prepared to explain and defend their decisions on growth	Noted. Confident and courageous decisions are required.

Paul & Williamsons for Client

Ms Elaine Farquarson-Black

AC.8.1	There would be advantages in identifying a new settlement area to the south of Aberdeen	Noted. This is taken as supporting a new settlement strategy.
AC.8.2	Many of the existing settlements within Aberdeenshire are reaching their notional capacity in terms of landscape, infrastructure and distance to amenities. The structure plan should take a significant number of the required units and employment land and plan an overall settlement rather than continuing the incremental expansion of existing settlements.	Noted, this is taken as support for the new settlement strategy. It is likely that more than one new settlement would be required to accommodate the scale of development required.

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AC.8.3	Locating a new settlement to the south of the City offers an advantage in terms of: its strategic location and proximity to the A90 and AWPR and its "fast link", the significant employment areas to the south of Aberdeen City, the potential to connect existing infrastructure in the area and to provide new infrastructure in a planned way with a critical mass, the proximity to the A90 will provide connectivity to locations south of aberdeen such as Dundee and there is significant landscape capacity in the south to accommodate further development with a very limited amount of environmental designations in contrast to other areas around the city.	Noted. This is taken as support for the new settlement strategy.
AC.8.4	The plan should, in addition to a new settlement, focus growth on settlements which have a strategic role within the Shire as well.	This is taken as support for a strategic option which combines new settlements with development in growth poles across Aberdeenshire.
AC.8.5	A suggested split of new housing between the City and the Shire would be 40% in the City and 60% in the Shire.	This comment supports strategies which promote most of the development in Aberdeenshire and Significant development in Aberdeen City

Paull & Williamsons for Gladedale Limited

Ms Elaine Farqharson-Back

AC.9.1	It appears that the structure plan is trying to conform with the 2006 Planning etc (Scotland) Act 2006, and if this is the case, the Issues Report or the timetable does not conform with the 2006 Act. The Act states that the Issues Report should set out proposals for new development. The Issues Report does not contain any proposals for development - this will come out of the Spatial Strategy, but that Strategy has not yet been prepared and the timetable does not allow for representations on the strategy.	The relevant parts of the 2006 Act have not yet come into force, draft regulations have yet to be published. The structure plan currently being prepared is being progressed under the existing legislative framework. The 'issues report' published in February is not intended to be the "Main Issues Report" envisaged by the 2006 Act.
AC.9.2	The timetable schedules the publication of the draft Action Programme after the publications of the draft Plan, which is contrary to legislation.	Part 2 of the 2006 Act has not yet come into force, draft regulations have yet to be published. There is no legal requirement to publish an Action Programme under current legislation.
AC.9.3	The Vision appears weak in relation to encouraging and promoting economic growth across the region, and conflicts with the "confident and courageous" approach proposed in the draft Vision, which Gladedale (NE Scotland), formerly Bett Homes (NE Scotland) believe is down to the use of out of date forecasts, as they have a base date of 2001. Biennial Forecasts should have been carried out in 2006 for the next structure plan.	This comment suggests a re-wording of the vision to encourage the economic growth of the region. The vision has not been drafted on the basis of any forecasts; it was not drafted based on a consideration of data from the Report of Survey, but on a consideration of the views and aspirations of stakeholders and elected members.
AC.9.4	The vision does not express the need to reverse any signs of population decline (if that is what is predicted in forecasts), such as promoting initiatives to encourage businesses and workers to locate in the area.	Noted. The vision is a statement of aspiration. Specific land-use planning goals that reflect the vision (as revised), as well as the issues that the plan should address, will be made clear in the plan's aims and objectives and through the choice of an appropriate strategy.
AC.9.5	The plan needs to take positive steps to attract workers to live in the area, and correlation between employment and housing land allocations is required. More people should be encouraged to live in the City given the loss of families to the shire.	Noted. This comments supports a spatial strategy that proposes development in the City area.

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AC.9.6	We support the regeneration of disadvantaged areas, but that other areas should not be excluded. Land will be required to be released for development in various locations, not solely on disadvantaged sites.	Noted.
AC.9.7	Past completions show a disproportionate amount of land being developed in the Shire. The plan must readdress this imbalance between the City and the Shire.	Noted. This is taken as support for a strategy which seeks to promote additional development in Aberdeen City and a more equitable distribution within the strategy between the city and other locations.
AC.9.8	The current green belt will need to be critically assessed in terms of landscape, infrastructure and environmental issues and whether it still serves the functions of the green belt under Scottish Planning Policy 21: Green Belts. Land, particularly within the City, should also be released for development.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AC.9.9	The needs for and amount of affordable housing required (if provided through the plan) should be determined against new Housing Needs Assessments and Local Housing Strategies. The plan should also state that affordable housing can be provided by anyone, and not just through the Devanha Partnership.	Noted. The structure plan will draw on information on the housing needs from the local housing strategy. The plan will not restrict the provision of affordable housing solely through the Devanha Partnership.
AC.9.10	The structure plan should not dictate the size of houses, as that is something that the market will decide, using market research. The release of more development land will ensure a wider mix of types, size and affordability of new homes. Not releasing housing land has led to a rise in land prices and developments of principally 4 or 5 bedroom units.	Noted. This is taken as support for a high growth scenario
AC.9.11	If the plan includes policies requiring developments to improve the environment through sustainable measures, this must be supported by renewable energy policies. Sustainability of new buildings is already required to a certain extent under the building regulations. The Plan should have regard to the requirements under Scottish Planning Policy 6: Renewable Developments on-site and renewable sources of energy and new developments.	Noted.
AC.9.12	Support any proposals that maintain the role of existing shopping areas and improve the attractiveness of these areas. Councils should ensure that major development areas are accompanied by appropriate services.	Noted. The approach to retailing within the structure plan will be that advocated in SPP8 with identification of town centres and other significant retail areas.
AC.9.13	We would support developments that have both housing and employment land located in close proximity.	Noted.
AC.9.14	The plan should recognise that by its nature the Shire is different from the City and is not well served by public transport. Land being released for development should relate, where possible, to the main routes served by public and other transport modes. For example, at junctions of the AWPR or where there are railway stations or halts.	Noted. This view is taken to support development along a transport corridor or corridors.
AC.9.15	Councils to date have left it for developers to negotiate directly with Scottish Water over the provision of water and sewerage facilities. If developers/land owners are to provide such services, councils need to ensure that allocations are of sufficient size to support the necessary investment in infrastructure.	Noted. A technical evaluation of the spatial strategies will be undertaken with infrastructure and service providers to establish whether the spatial strategies can be delivered. This will allow infrastructure providers from an early stage to align their investment programmes accordingly.

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AC.9.16	The plan will require well thought out renewable energy policies and have regard to Scottish Planning Policy 6: Renewable Developments and national targets for on-site low carbon and renewable sources of energy and new developments. Consideration should be given to building along the main transport corridors and public transport routes to reduce the need to travel.	The requirements of SPP6 will be considered in the development of the structure plan.
AC.9.17	We support the need to protect and manage the area's built and natural heritage, but this needs to be balanced against the need to release land for development to enable the area to expand.	Noted.
AC.9.18	We support the release of development in areas well located to the AWPR (especially along the junction of the A90, A93, A96, A944 and A947). Releases should coincide with employment and retail opportunities where appropriate.	It is the policy of both authorities to avoid the creation of a development corridor along the AWPR. AWPR villages have been considered and dismissed as a component of the strategy due, amongst other things, to their inability to deliver the scale of development required, their poor sustainability and their potential impact on the road network. We agree that releases of housing land should coincide with employment and retail land releases.
AC.9.19	Development should be supported in the following locations: smaller settlements that are well located to the AWPR, railway stations, or adjacent to arterial corridors already served by public transport. Releases should coincide with employment and retail opportunities where appropriate.	This is taken as support for the "Edge of City settlements" and "Existing Transport Corridor" strategies. The need for colocation of business and community facilities is noted.

Paul & Williamsons for J & B Walker

Ms Elaine Farquharson-Black

AS.35.1	Supports the draft vision as it acknowledges that the needs of communities will differ.	Noted.
AS.35.2	Greater consideration needs to be given to each individual settlement at the Structure Plan stage in fixing housing and employment allocations since they guide the site specific releases through Local Plans.	The statement appears to support the dispersal spatial option. However, depending on the spatial option selected, the structure plan's main principle is to look at the NE as a whole. The structure plan will not identify the total housing (or other) land requirements, as the nature of the plan means it cannot go down to the local level. Consideration is being given to not allocating part of the total requirement in the structure plan, and seeking to distribute this in the next local plans on a site by site/need by need basis.
AS.35.3	A blanket approach to housing allocations, as undertaken in the current structure plan (NEST) (e.g. restricting the number of new houses in areas not identified as a 'main settlement') is inappropriate.	This is an implication of a plan led planning system. Restrictions in some areas are necessary to promote appropriate levels of development in others.
AS.35.4	Regard should be given to each settlement in terms of services and facilities that exist and whether there is potential to maintain and expand these facilities through additional land allocations.	Depending on the spatial option chosen, it is likely that such a task (e.g. reviewing all settlements) will be undertaken at the local plan level. Settlement Profiles of 180 settlements was produced in 2002 for the current Aberdeenshire Local Plan.

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AS.35.5	Changes in population structure will impact on the type and location of housing, which the structure plan should be catering for, and not be planning for a declining population.	Noted. This is taken as support for a growth strategy.
AS.35.6	Regard needs to be given on whether investment will be forthcoming for regeneration schemes. Development allocations throughout the area would ensure there is enough land in different locations at different values for everybody.	Noted
AS.35.7	The community needs of each individual settlement should be addressed in Aberdeenshire, as not everyone wants to live in Aberdeen. A spread of development opportunities has other benefits (e.g. to cater for the settlements (e.g. more facilities) or communities (e.g. services for the elderly) own needs).	This approach appears to support a dispersal strategy. However, to identify the needs of the settlement and community is better suited at the local plan or community plan level through Settlement Profiles, and, depending on the size of the settlement, Capacity Studies.
AS.35.8	Supports the reassessment of the green belt, as it is a requirement of the structure plan review.	Noted.
AS.35.9	Supports the promotion of a range of new housing developments in a range of communities.	Noted. The plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community.
AS.35.10	Support high quality development layouts and designs, which would make a positive contribution to the area, but this issue should be reserved for the local plan.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.35.11	Support the provision and retention of shopping facilities that serve towns and villages across Aberdeenshire.	The support is noted.
AS.35.12	Any land set aside for business uses should be reviewed annually and released for other types of development if these sites are not developed within an appropriate timescale, due to lack of demand.	Noted. There may be a variety of reasons why land set aside for business or industrial uses has not been developed and some of these may also affect the demand for that site. For example, land that is constrained by infrastructure deficiencies may not be in demand until such problems are addressed. The need to safeguard an adequate supply of land, for a range of employment uses must not be overlooked.
AS.35.13	Regard should be had to the diversity of communities within Aberdeenshire, and to build upon existing settlements and providing sufficient land to provide these facilities in order to reduce the need to travel. Restricting development opportunities to certain settlements (and limiting the amount of new building in the smallest villages) will not enable 'self sustainability' to occur.	Noted. Dispersal of development will not reduce the need to travel. It is accepted that opportunity needs to be provided for local communities to develop and so sustain themselves. We do not agree that implementing a spatial strategy, to target development to areas where infrastructure can be provided, is unsustainable.
AS.35.14	Development needs to be of sufficient scale to pay for additional infrastructure. Better co-ordination is required with the relevant authorities at a strategic level rather than requiring developers to undertake all negotiations.	Noted. The pattern of development that the structure plan will prescribe has taken cognisance of the fact that in order to provide sufficient infrastructure and services it is necessary to allocate a critical mass of development to make these provisions feasible.

AS.35.15	Support the proposals to tackle the causes and effects of climate change, but not all developments can incorporate renewable energy technologies due to variations in site conditions.	Noted.
AS.35.16	Support proposals to protect and manage built, natural and cultural heritage, but further land will need to be identified for development purposes.	Noted.
AS.35.17	Development needs to be spread throughout Aberdeenshire to existing settlements, and propose significant development at Kirkton of Rayne (roughly 8km/5miles NW of Inverurie) on 1,000acres of farm land in their ownership. There is a primary school half a mile away that is undercapacity, and nearby settlements provide a range of local services (e.g. shop, playing field, community hall, restaurant, and a petrol station).	This proposal supports a strategy of development within the existing transport corridor. As stated the proposal does not meet current expectations for either maintaining a critical mass of population to sustain communities (development of the scale proposed would require significant short term expansion of the school) or creating a self sufficient new community, as it would seem to rely on facilities and services in adjacent settlements.
<p>Paul & Williamsons for Mr Alan Buchan Ms Elaine Farqharson-Black</p>		
AS.34.1	If the needs of individual settlements are considered at the structure plan stage then that will guide the site specific releases through the relevant local plans.	Individual settlements may only be considered if they form an integral part of the spatial strategy. Including all settlements within the plan removes flexibility and the ability for local communities to determine their own future within the context of a local plan.
AS.34.1	The adopted Structure Plan directs development to existing settlements, but in the past the settlements which are not classed as main settlements have been restricted to 15 or fewer unit housing allocations. This approach is not sustainable nor does it accord with addressing the needs of different communities in different ways.	This is taken as support for a level of development independent of the needs of the city region.
AS.34.2	A blanket approach to housing allocations is inappropriate as each individual settlement will have its own services and facilities that currently exist which can be maintained and expanded through additional land for development.	This is taken as support for a level of development independent of the needs of the city region. Such an approach ignores the benefits, in terms of economies of scale, that implementation of a spatial strategy would bring.
AS.34.3	We are concerned with the suggestion in the issues report that the Councils are planning for a decline in population rather than encouraging growth.	No decision has been taken about whether to plan for decline, the status quo, or growth. It is taken from this comment that the consultee would not favour a "low" growth scenario.
AS.34.4	If particular local facilities such as shops, healthcare facilities etc are required by communities then a critical mass of both housing and employment land should be allocated to ensure delivery of these facilities and regard should be had to this in identifying locations for development.	Noted. New development is unable to resource the resolution of existing problems, this requires other interventions. Identification of a local need for development to sustain local services may be taken as support for a strategy that promotes development for local needs.

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AS.34.5	The greenbelt needs to be reassessed. This is a requirement of a structure plan review and will ensure that sufficient land is identified for a range of new housing in a range of communities.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt has yet to be undertaken.
AS.34.6	Expanding existing facilities and providing sufficient development land to provide or enhance facilities within a settlement which may be currently lacking is one way of potentially reducing the need to travel.	Principle generators of travel are the "travel to work" the "travel to education" and the "travel to shop". Provision of local employment, education and retail opportunities local to centres of population would have an impact on the need to travel.
AS.34.7	Newmachar is well placed to accommodate additional development as it is already well placed for the airport and Dyce Drive business park and it will benefit further with the proposed junction of the AWPR with the A947	Noted. This is taken as support for the "edge of city communities" strategy.
AS.34.8	Newmachar has been going through a period of restraint with only one area marked in the Aberdeenshire Local Plan for future housing in the period 2006-2010 with an indicative capacity of 5 units.	Noted.
AS.34.9	Whilst Newmachar Primary School is currently overcapacity, additional housing allocations for the settlement could help relieve the pressure on the school by providing additional space at that school or, if the critical mass was sufficient, the provision of a new school	This is taken as support for an "edge of city settlements" strategy
AS.34.10	The land to the north and north east of Newmachar would be a suitable area for a mixed residential development being located close to the centre of Newmachar where the current facilities are situated.	Noted. This is taken as support for an "Edge of city communities" strategy.

Paul & Williamsons for Stuart Milne

Ms Elaine Farquarson-Black

AC.11.1	We would wish to make representations on the spatial strategy when that is published for comment.	The spatial strategy will be published in the draft plan. There will be a public consultation on this draft plan at the appropriate time.
AC.11.2	It appears that the structure plan is trying to conform with the 2006 Planning etc (Scotland) Act 2006, and if this is the case, the Issues Report or the timetable does not conform with the 2006 Act. The Act states that the Issues Report should set out proposals for new development. The Issues Report does not contain any proposals for development - this will come out of the Spatial Strategy, but that Strategy has not yet been prepared and the timetable does not allow for representations on the strategy.	The relevant parts of the 2006 Act have not yet come into force, draft regulations have yet to be published. The structure plan currently being prepared is being progressed under the existing legislative framework. The 'issues report' published in February is not intended to be the "Main Issues Report" envisaged by the 2006 Act.
AC.11.3	The timetable schedules the publication of the draft Action Programme after the publications of the draft Plan, which is contrary to legislation.	Part 2 of the 2006 Act has not yet come into force, and draft regulations have yet to be published. There is no legal requirement to publish an Action Programme under current legislation.
AC.11.4	The vision is not a "planning for growth" vision. The vision should cement Aberdeen City and Shire as the Energy Capital of Europe. It should encourage existing and new industries and consequential population growth. The draft vision is directed at maintaining what we have.	Noted. This view supports a re-wording of the vision, to emphasise the importance of the energy sector to the future regional economy and to suggest that economic growth should be stimulated.

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AC.11.5	The bullet points in the vision virtually paraphrase the vision statement in the approved structure plan. The structure plan needs to achieve more than its predecessors.	Noted.
AC.11.6	Comment on the draft vision is difficult without seeing the aims and objectives that will help its realisation.	Noted. The purpose for asking for opinions on the draft vision was to determine whether the aspirations outlined were considered appropriate for the development of the region over the next 25 years.
AC.11.7	How can the structure plan be going forward at this time when there are no up to date forecasts to underpin the plan? These require to be produced in early course and publically consulted upon.	Forecasts are currently in preparation and assumptions will be discussed with stakeholders prior to publication. However forecasts are but one input to the process.
AC.11.8	The report of survey is very negative.	This highlights the challenges facing the area, and the need for confident and courageous actions to turn around the possible future which these forecasts suggest.
AC.11.9	Policies and proposals are required to address any threat of the potential economic decline. It should be encouraging Government departments, financial and other businesses to locate here, and seeking to consolidate the areas place in the Energy market. It needs to make the area a vibrant and attractive area in which to live and work.	Noted. Increasing the attractiveness of the area to new or relocating businesses is likely to be a key objective for the plan.
AC.11.10	The plan needs to encourage people to live and work in the area. Net migration from the city is a major concern.	Noted.
AC.11.11	To support the existing strengths of the area one key aim must be to attract further skilled employment to the area.	Noted.
AC.11.12	Appropriate housing needs to be provided for different elements of the population and there should be variety in location and housetype	Noted.
AC.11.13	The plan needs to take steps to encourage more families and adults of working age . Loss of families from the City has been due to lack of appropriate development land and the preparation of the plan represents an opportunity to reverse this trend.	Noted. This is taken as support for a strategy which promotes development in Aberdeen City.
AC.11.14	Regeneration of existing areas should take place as part of a wider growth strategy. Regeneration which only replaces existing housing should not be counted towards meeting the overall housing requirement.	Noted.
AC.11.15	There has been an imbalance in supply, range and choice of housing supply in the City and in the towns of the Shire. Significant greenfield land releases will be required, rather than relying on brownfield redevelopment.	Noted. This supports a strategy of urban expansions within Aberdeen City.
AC.11.16	There is a duty on local authorities to review the current green belt. The plan requires to recognise the need to release greenfield land in the City and Shire to support economic growth.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.

AC.11.17	The number and types of houses to be built needs to be informed by forecasts . These need to tie in with proposed employment growth.	Forecasts are unlikely to be accurate over the 25 year life of the proposed plan.
AC.11.18	Insufficient land has been released timeously, and in the right locations, resulting in huge competitions for the land and the houses subsequently built. There is demand for all sectors of housing . No artificial time constraints should be introduced which would prevent the sequential release of land to meet demand. In this regard lack of a review of NEST has led to a significant break in the delivery of family housing, particularly in Aberdeen City.	Noted. It is clear that the design of a "release mechanism" to allow the structured release of land in the light of triggered events will be critical to the success of this plan.
AC.11.19	We have concerns about both the way in which the housing requirement will be calculated and that it will attempt to prescribe the mix of houses to be built. Through dispersed sites across the Housing Market Area there should be a range of housing land opportunities which will meet product choice and mix, and meet the demands of the population who may wish to live there. Developers are best placed to know what type of housing the market is expected.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document. Also we are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development over the next 25 years and also the preferred locations for this development . A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AC.11.20	It is essential that a new Housing Needs Assessment is carried out as the existing assessments are fundamentally flawed. If a robust HNA , through a Local Housing Strategy, identifies a need for affordable housing then this needs to be added to the overall housing land requirement. This needs to be quantified to allow monitoring.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document.
AC.11.21	Design is not an issue for the Structure Plan, it is not a strategic issue.	Noted
AC.11.22	The phrase "benefit the environment" is woolly and requires clarification to avoid challenge and confusion	Noted. This phrase will be avoided.
AC.11.23	We support the maintenance and improvement of the attractiveness in the centre of Aberdeen as well as spread across towns and villages within the Shire. This should be seen as an overall strategy for growth , linked to areas where land is released for development.	The support is noted.
AC.11.24	Comments on this issue appear to be planning for decline . It is of a concern that the plan seems to be addressing "economic uncertainty" rather than economic expansion and stability. It would be appropriate for the plan to set aside land for development in the same way as it does land for housing . It also has to be in the right places.	It is thought that economic uncertainty may be an issue the plan has to deal with and the draft vision provides an indication of how the plan will seek to address this. It should be noted that the allocation of particular sites for housing or employment purposes is a Local Plan issue, although a structure plan should seek to direct employment land to "the right places" at a regional level.
AC.11.25	If there is no market demand land allocated for employment uses should come forward for alternative uses.	Such an approach raises a hope value which may result in land not being brought to market for employment uses, despite zoning. Serious consideration will have to be given in the plan as to how a strategic employment land supply can be maintained.

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AC.11.26	It is hard for developers to reduce the need to travel when relevant public transport infrastructure is not in place. The development industry should not be required to subsidise public transport replated to their development. Greater coordination is required between public transport providers and the growth the plan is forecasting	Noted. It is legitimate for developer contributions to assist in the provision of public transport infrastructure to meet the additional needs of their development, but not to fund servioce provision, except by agreement. As part of the strategic approach advocated there will be more coordination with servic providers.
AC.11.27	Building in the suburbs of the city may not be possible in accordance with SPP17 . This may however be inevitable and the plan requires to recognise this.	Noted.
AC.11.28	Since one of the main issues for the area must be the forthcoming AWPR, it is a surprise that there is no mention of it within the report.	The construction of the AWPR is not something that will be determined by the structure plan. The Regional and Local Transport Strategies provide the transport policies for the region. Whether and to what extent the AWPR effects the future land-use development of the region (and vice-versa) will depend upon the the development strategy that is eventually adopted. The identification of the strategy is a separate process to the issues consultation (see Table 1 in the Development Plan Scheme).
AC.11.29	It is imperative that the plan makes sure that developments are built where there is existing infrastructure capacity, or that by releasing sufficient development land new or improved facilities can be provided for the betterment of communities. Coordination of development with infrastructure providers is required. Limiting development to only 15 units in rural areas has not allowed appropriate infrastructure to be provided.	Noted. The proposed spatial strategies have taken cognisance of this.
AC.11.30	It is dissapointing that the comments suggest that development is making a major contribution to climate change, a balance has to be taken between growth and the environment	Noted.
AC.11.31	Reducing the need to travel will be very difficult unless every existing settlement is increased to provide a range of uses - that would be simply impractical.	Noted.
AC.11.32	We would resist a policy requiring all housing developments to use renewable energy as such measures are likely to have knock on impacts on house prices and affordability.	Noted. Scottish Planning Policy 6 on renewable energy provides for part of the context for the way in which such issues will be addressed.
AC.11.33	Different and more modern designs may be appropriate, it may not always be best to keep replicating the areas previous built heritage.	The design of new developments will be dependant on the developers preference and local plan policies (e.g. if the site is within a Conservation Area or within the grounds of a listed building). The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AC.11.34	It will be important to expand settlements which are strategic in terms of the AWPR and to release land which can take advantage of the AWPR	Noted.

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AC.11.35	A hierarchy of settlements is unnecessary. The plan should direct growth towards growth areas and have a general policy covering development in other areas. The plan should not stop development in settlements which are not named in the plan if there are good reasons for the development and it complies with the overall strategy of the plan.	Noted. This is taken as support for the concept of a spatial strategy, and for a level of development to meet local needs across Aberdeen and Aberdeenshire.
AC.11.36	A minimum of 55,000 house sites require to be released over the next 25 years	Noted. This supports a "medium" or "high growth" scenario.
AC.11.37	The plan should focus development in a new settlement.	The support for a "new settlement" strategy is noted.
AC.11.38	The plan should focus growth on those settlements within the Shire that currently have a strategic role.	This supports the "growth pole" strategy.
AC.11.39	The City should provide 45% of the new housing in the structure plan area. In addition allocations debated at the Aberdeen City Local Plan PLI should remain as allocations to create certainty and consistency.	Noted. This equates to a strategy which sees development occurring in Aberdeen City through urban expansion.

Paul and Williamson for Mr & Mrs Goodwin

Ms Elaine Farquharson-Black

AS.33.1	The needs of the region's diverse communities should be addressed in a different manner to the fairly subjective treatment provided by the current structure plan. The ranking and categorisation of settlements in NEST does not recognise the individual circumstances of particular villages; the new plan should take account of the level of services and facilities that a community has or would benefit from, and should have regard to the largely rural character of Aberdeenshire.	Noted. This comment supports a re-wording of the vision to focus on the needs of communities and of providing for attractive places to live throughout the region.
AS.33.2	The Councils should recognise that measures to encourage the use of sustainable modes of transport and reduce the need to travel do not always address the needs of the dispersed communities of Aberdeenshire. The need for people to travel could also be reduced by extending existing housing developments and by providing sufficient land within settlements, to provide facilities that are currently lacking. Restricting development opportunities to larger centres will not enable the aims of sustainable development to be realised.	Noted. It will be important for the structure plan to reduce the need to travel. In addition, however, SPP 17 makes clear that Regional Transport Strategies are to be co-ordinated with Structure Planning and it will be important that the structure plan provides a strategy that will complement future transport projects and initiatives, including those designed to increase the use of sustainable modes of travel, relative to the use of the car. The future pattern of development should be sufficient to provide for the transport-related improvements required to sustain economic prosperity.
AS.33.3	There is a need for a range of new housing in a range of communities, as suggested in the Issues Report. The layout and design of all new developments should create high quality environments, which positively contribute to the area.	Noted. The plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community. Design standards and housing layout will be fully addressed in the next local plan.

AS.33.4	Detailed policies on the design and layout of new developments should be provided in a local plan.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.33.5	Development should be spread throughout Aberdeenshire, to existing settlements. In particular, Old Leslie and Leslie could accommodate additional housing, to provide the critical mass in this area. An extension to Old Leslie could be sustainable and provide low cost housing, to attract young people to the area. This would be in keeping with the Councils' vision.	Noted. This is taken as support for a strategy that disperses development throughout Aberdeenshire.
<p>PPCA Ltd for Banchory / Devenick Estate Mr Neil Sutherland</p>		
AS.79.1	There seems to be a lack of co-ordination between the structure plan and the AWPR. The plan must take into account the effects of the AWPR, in preparing solutions to the issues faced by the region.	The interactions between future development and the proposed AWPR will be taken into account and will inform the technical assessment of the possible strategies for development.
AS.79.1	The priorities for the region are, in order of importance: a prosperous economy, sustainable development, providing benefits to communities and appropriately protecting the environment.	It is noted that this view supports a re-wording of the vision, to reflect the suggested hierarchy.
AS.79.2	The plan must make clear that any strategic allocations close to the AWPR must be permitted to make appropriate strategic links to this road.	Noted. It will be important to ensure that future development can be well integrated with the regional transport network, without adversely affecting journey times.
AS.79.2	The draft vision is a catch-all statement and all of the topics covered (e.g. sustainability, the economy) are proper matters for the structure plan to consider.	Noted.
AS.79.3	The plan should not seek to rely solely on the effectiveness of rail travel, to encourage greater use of public transport. Bus-based systems may work just as effectively in the case of Aberdeen, given that development in the region has not previously been driven by rail provision. It should not be assumed that everyone can live in close proximity to rail stations.	Noted.
AS.79.3	The idea that the authority will be confident and courageous in making the necessary hard choices is welcomed. It is agreed that hard choices will inevitably be required to be made - the critical point is that the correct choices are made.	Noted.
AS.79.4	A robust strategy for the plan would encourage rail travel, but would also promote a sustainable use of the existing and programmed road network. This would involve positioning attractive park and ride facilities at key points around the A90 and AWPR.	Noted. The provision of park and ride facilities is an issue for the Regional and Local Transport Strategies for the region. It will be important for the plan to support and inform future strategies of these types.

AS.79.4	The vision does not give any indication as to an order of priorities between: sustainability, the environment, the economy and communities. There will be conflicts between delivering these four topics - it is proper that relative merits are considered when it comes to assessing individual proposals, however an indication of the weighting that should be assigned to each priority should be given.	Noted. The vision is a statement of aspiration. It is envisaged that an indication of how the four topics acknowledged are to influence the development of the region will be made clear through a set of aims and objectives, drafted using the vision. One of the roles intended for the plan's aims and objectives is to provide specific land-use planning goals, so as to guide decisions on major development and provide an indication of what will be required from users of the plan, in order to realise the vision.
AS.79.5	The vision would be improved by clearly recognising that the economy of the region will be the driver for growth. Focusing on the economy is essential to attracting new investors, to delivering infrastructure and environmental improvements, to providing for the regions communities and to keeping existing workers and attracting new people to the area.	Noted. This comment supports a re-wording of the vision to focus on providing for economic growth and to highlight the importance of prosperity for other goals.
AS.79.6	The Councils should ensure that growth is directed to sustainable locations, attractive to business and industry. This will allow development to contribute to fulfilling the economic, environmental and social needs of the region.	Noted. The issue of how development should be distributed across the region is a separate issue to the content of the plan's vision. This issue is also being explored through engagement with communities and stakeholders on different possible strategies for development (see Table 1 in the Development Plan Scheme).
AS.79.7	It is considered likely that the decline in population in Aberdeen is in part due to over- reliance on brownfield land to deliver new housing stock and resulting in the provision of a significant number of flats being built.	Noted
AS.79.8	In terms of the economy it will be important to ensure that population does not decrease over the coming years as without people to work in, use and support the range of public, community and commercial businesses they will inevitably fail.	This is an expression of the concept of critical mass articulated in the draft vision.
AS.79.9	A key goal should be to ensure that the region remains attractive in respect of its economy and environment as to do so would encourage existing families and workers to stay in the area and attract new workers and families to help sustain and grow the economy, and potentially buck the trend.	Noted. These are concepts which are inherent within the draft vision.
AS.79.10	Allocating some development in towns and villages can help create the critical mass that can contribute towards providing economic and social benefits, but such an approach risks their identity. A balance has to be struck between allocating development close to Aberdeen to provide a critical mass capable of delivering real infrastructure and economic benefits and locating some development in towns and villages.	Noted. This issue of critical mass is fundamental to the draft vision for the plan.
AS.79.11	Aberdeen City cannot deliver the required amount of land to facilitate the amount of building that is likely to be needed. The amount of greenfield land is extremely limited and brownfield land cannot provide the solution for everything. On the other hand the natural attraction of Aberdeen City centre for business investment and generally as a place to live cannot be ignored. A balance requires to be struck between development in Aberdeen and Aberdeenshire.	Greenfield land in and around Aberdeen is not so limited that it could not deliver the land required if "confident and courageous" decisions were made.
AS.79.12	The majority of development should take place within and close to Aberdeen. New development cannot be expected to bring about a significant shift in the spatial planning of the region which will remain dominated by the existing pattern of land use. Further development should take place along the transport corridors into the city to build upon the existing sustainable pattern of development along these corridors.	This comment supports a strategy of promoting growth in Aberdeen City with additional growth in the edge of city communities.

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AS.79.13	Without sufficient working age people in the region the range of public, community and commercial institutions and businesses will fail and a long term downward spiral of long term social and economic problems	Noted. This comment supports a growth strategy.
AS.79.14	Whether need is met by incoming European workers, by encouraging existing workers to stay or a combination of the two, the key point is that it is essential that the economy remains vibrant, that the environment is of a high quality and that associated transport networks and infrastructure is provided	Noted.
AS.79.15	Growth of housing demand has exceeded that envisaged in the last plan, resulting in shortage and creeping planning to new areas. More accurate figures require to be used and sufficient land made available to meet demand	Noted.
AS.79.16	New development should bring benefits to all parts of society, including disadvantaged areas and those who find it difficult to find a home in the current housing market.	Noted.
AS.79.17	It is important to ensure that where housing is provided alongside employment uses to minimise the amount of commuting necessary, and maximise sustainability.	The plan will take cognisance of guidance set out in SPP3 which states that patterns of development should seek to reduce demand for travel and reliance on the private car.
AS.79.18	Affordable housing will continue to be an important issue, particularly in the Aberdeen Housing Market.	Noted
AS.79.19	There is a requirement to provide new houses over the life of the plan to accommodate the backlog of people waiting for homes, to provide a better range and type of housing and to provide affordable houses	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. The preferred scale of land to be released may be a high growth scenario which may help address some of the concerns detailed above. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered.
AS.79.20	There is a substantial backlog of affordable housing need which in itself will require additional land allocations if realistic attempts are to be made to reduce it.	The majority of land allocations will be made to areas identified in the spatial strategy while the remaining allocations will be made to reflect rural/local needs. The local housing strategy will establish the appropriate levels of affordable housing required within these areas.
AS.79.21	Experience of development in Aberdeen shows that due to costs of remedial works to brownfield land and the high costs of land, the majority of accommodation in recent years has been flatted, which is not attractive to families or the elderly.	Noted. This situation may change dependant on the preferred spatial strategy which will arise after a series of consultations and a technical evaluation.
AS.79.22	Housing should be provided close to Aberdeen along the main transportation corridors and so provide housing in accessible sustainable locations that link well with the existing centre of employment and commercial facilities.	The location of housing throughout the region will be largely dependant on the preferred spatial strategy which will arise after a series of consultations and a technical evaluation by infrastructure and service providers. Such a policy would help to reinforce existing communities and provide jobs and facilities close to where people live.

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AS.79.23	Allowing development to occur in an unplanned site by site manner cannot effectively deliver the maximum benefits to society, and hence cannot effectively aid the regeneration of disadvantaged communities	Noted. The plan will contain a vision which will detail how the region will develop over the next 25 years. The preferred spatial strategy will comply with the vision and ensure that there is the necessary critical mass of development in order to deliver the necessary services and infrastructure to serve developments. This approach should help maximise benefits for communities.
AS.79.24	There is an opportunity to integrate school improvements/provision with disadvantaged areas which often have difficulties in respect of education. Educational boundaries that bear no relationship to emerging strategic growth strategies must not be allowed to stand in the way and hence hinder the opportunity to maximise benefits to disadvantaged areas.	This is not an issue for the structure plan.
AS.79.25	Enabling disadvantaged communities to better contribute towards society and to ensure that they benefit from new strategic development would be to the benefit of all.	Noted.
AS.79.26	It would be sensible to ensure that the strategic development allocations are located within reasonable proximity to disadvantaged communities that may derive benefit from the investment in their area.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.
AS.79.27	Notes the new guidance on green belts: Scottish Planning Policy 21, and as Banchory/Devenick Estate is of the opinion that the majority of development should take place within and adjacent to Aberdeen, the green belt should be redrawn. Propose that the AWPR would be a natural boundary for the green belt, with development along the transport corridors with green fingers (not necessary green belt policy) to protect appropriate areas. This method would facilitate sustainable development and would retain important green areas.	The specific structure of the green belt (i.e. a belt and/or wedges) will depend on the outcome of the review.
AS.79.28	The design and layout of development is critical in determining their success as places to live and work, and if poorly thought out, can undo any amount of positive sustainable strategic thinking that lies behind employment and housing allocations.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.79.30	It would be inappropriate for the structure plan to be prescriptive on detailed design matters, but it could set a high target in terms of design and layout (e.g. to place a duty on Councils and developers to produce masterplans and where appropriate development briefs for strategic sites), but leave the detail of how it is to be secured to local plans, master plans and development briefs.	Agree that the structure plan should not set out detailed design matters.
AS.79.31	The structure plan should continue to promote sustainable patterns of development, and reduce society's effects on the environment giving the mounting evidence that climate change is happening now and will affect us all.	Noted.

AS.79.32	Facilitating development within and around Aberdeen and along the transport corridors represents the most sustainable option, (including the re-use of urban brownfield sites), taking pressure off Aberdeen and providing a choice of development allocations. In allocating strategic sites, the plan can consider what steps could be taken to encourage environmentally sensitive developments (e.g. district heating schemes or low carbon homes) to reduce the areas carbon footprint. Such steps could be encouraged at the local plan/SEA stage.	Noted. Reducing the environmental impact of new development will be an important consideration in the choice of spatial strategy and mitigating its impacts identified through the SEA process.
AS.79.33	Reliance on the railway lines alone as transport corridors is not wise, although it moves both goods and people in a sustainable manner, it relies on other bodies to provide capacity on the network and land for station lengthening and car parking. The strategy should promote growth along both rail and road transport corridors, and consider the impact the AWPR will have on development and transport patterns. Park and ride facilities should be created on the AWPR junctions and A90 to encourage sustainable access. Priority bus routes could be created with investment from strategic developments and the Scottish Executive.	Agree. This supports all the strategic options proposed (even the growth poles and new settlement options to a lesser extent). Detailed proposals for new or extended railway stations or park and ride facilities will be set out in the local plan context, unless they are identified in the National Planning Framework, which is currently under review.
AS.79.34	The release of strategic business and housing land along the transport corridors would allow development to take place on a range of sustainable sites. By locating business land and housing in close proximity, the opportunities to live and work in the same location are maximised, and could also work on a smaller scale.	Noted. This gives support to developing along the transport corridor and edge of City settlements. Specific site/land allocations will be considered in the local plan context.
AS.79.35	The plan must do all it can to drive the economy forwards. It should not seek to manage decline, but to plan for future economic success through diversification and development in oil-related areas.	Noted.
AS.79.36	To plan for economic decline would be contrary to national planning guidance and would place the region at a severe economic disadvantage.	Noted.
AS.79.37	To be pro-active, sufficient land must be provided for business as well as housing purposes. It is essential that sufficient employment land is allocated of the type and in locations that businesses require. A choice of location is needed to provide for the diverse needs of different businesses.	It is noted that this comment supports the idea that the plans should provide a range and choice of locations for development, to suit the diverse needs of industries and businesses.
AS.79.38	Locating a high quality business park at a gateway site (e.g. on the AWPR or close to the A90) would send a clear message that the Councils believe in the economic future of the region. A high profile business park could also attract new businesses.	Noted. A number of such sites are currently being developed close to the strategic road network. It will be important to secure reliable journey times between Aberdeen and other areas; the plan must ensure that negative impacts on strategically important roads are minimised.
AS.79.39	By focusing business and industrial development in Aberdeen and along transport corridors, the plan would provide new developments with good access to markets and to a working population base. If such development were located close to disadvantaged areas, the benefits could also be spread to these communities.	Noted. The needs of business and industry are varied and the plan should ensure that land is provided to meet a broad range of locational requirements.
AS.79.40	The plan should seek to maintain Aberdeen's role as a retail centre of national importance.	Noted.

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AS.79.41	It may be the case that some larger housing allocations require an element of retail provision. The plan will need to identify suitable locations for new facilities to serve new developments.	Noted. It will be important that any new retail facilities are accessible by a range of modes of transport. SPP 8 suggests that, in general, a sequential approach to identifying sites for retail facilities should be adopted, with town centre (including city centre) sites being most preferable. The identification and scale of shopping facilities within new developments is a matter for local plans and master plans.
AS.79.42	Retail development to complement small-scale business and housing developments along a transport corridor would not threaten the hierarchical position of Aberdeen. It would be inherently sustainable, as it would create environments where people can live, work and shop without having to travel to undertake each activity.	It should be recalled that the retail hierarchy includes retail centres outwith Aberdeen. It is not clear, without further consideration, how retail development of the scale envisaged would affect the vitality and viability of Aberdeen and Aberdeenshire towns. It should be remembered that the list of policy principles provided in SPP 8 include several that specifically encourage the development of retail facilities in town centres (including within existing town centres).
AS.79.43	A high profile business park on a gateway site (on the AWPR and close to the A90) would send a clear message that the area believes in and is investing in the economic future of the area	Noted. A number of such sites are currently being developed in this area.
AS.79.44	We are of the view that as a first principle the Strategic Development Plan should plan for growth. Without a strong economy the necessary investment in infrastructure housing, new and existing businesses, research and development and in environmental improvements will not be forthcoming. Inaction risks the economy stagnating, giving rise to long term social and economic problems. The plan must conform the NPF, which is a plan for growth.	This comment supports a growth agenda.
AS.79.45	The strategic plan should be a plan for growth in sustainable locations. Development must be located in Aberdeen and along the main transport corridors.	Noted. Sustainability is a fundamental principle of the draft vision for the plan and will be a key determinant in decisions of the preferred strategy.
AS.79.46	Reliance on the railway lines alone as transport corridors is not wise. It plays a part in moving people and goods around but cannot provide the whole answer. The strategy should promote development along both road and rail corridors with the use of park and ride to encourage sustainable access	Noted.
AS.79.47	Reliance on one mode of transport in directing strategic development would not make best use of existing infrastructure. Rail improvements may not be delivered and cannot transport people from or to anything but a train station. Strategic park and ride facilities in conjunction with the main transport arteries would make movement of commuters far more flexible and deliverable.	Noted. This supports a strategy of development on the main transport corridors, and dismisses any advantage provided by rail
AS.79.48	We agree that the areas built and natural heritage assets should be managed and protected, but careful thought needs to be given to this definition to avoid unnecessary prohibition of development.	The support is noted. We would agree that care will have to be taken in the definition of the terms used.
AS.79.49	Development should avoid those areas that provide a strong landscape setting for Aberdeen City	Noted.

AS.79.50 The public perception of green belts and landscape quality have been influenced by past policies which may now have to adapt to new circumstances. This will be a key issue for the new plan

Agreed. It is important that the policy nature of some designations is made clear, and that the next plan does not become constrained by historic policies.

Robert Gordon University

Mr Mike Berry

AS.56.1 We wish to have consideration given to a "University or Higher Education Zone at Garthdee" as a significant component of the spatial strategy for the Structure Plan. This would be an area where Higher education related facilities would be supported by both Authorities enabling a cohesive approach to addressing infrastructure problems as well as ensuring that maximum benefit accrues.

This proposal and the wider role of the universities could play a significant part in many of the strategic options being considered and requires serious consideration.

Royal Society for the Protection of Birds

Dr. Ian Francis

AS.20.1 The vision shows limited emphasis on encouraging truly sustainable development. The vision should place more emphasis on the conservation of natural resources and biodiversity, as a very real test of sustainability. It should not just be a case of managed responsibility, but rather to critically evaluate resource and development impacts, and where possible, to create and compensate for the habitats lost.

Noted. The comment suggests a re-wording of the draft vision, to emphasise the importance of the conservation of the region's natural heritage. It should be noted that the vision is a statement of aspiration and that it is the aims and objectives of the plan that will provide the land-use planning goals for the realisation of the vision. The aims and objectives have yet to be drafted, but will reflect the revised vision and the issues that the plan should address.

AS.20.2 The plan should not be encouraging population increases; instead resources should be balanced towards stability, ensuring a balanced demographic profile to manage this or to allow for gradual decline.

This is taken as support for a low growth strategy for the city region.

AS.20.3 The existing green belt has only slowed development, and it is gradually being eroded over time. The wording of the paragraph in the Issues Paper (i.e. to ensure the green belt does not stop appropriate development) weakens its role.

The wording of the paragraph in the Issues Report is supported in the revised national green belt policy, as outlined in SPP21: Green Belts, which states their purpose as managing the growth of a town or city in the long term. The SPP states that they should be used to direct development to suitable locations, not to prevent development from happening in general.

AS.20.4 The stated intentions in the Issues Report (i.e to reduce the need to travel and encourage non-car modes of travel) do not match where resources are being directed to at present, namely the AWPR.

The view is noted. Whether and how a future AWPR will effect the need to travel and encourage the use of the car will depend on the pattern and principles of development laid out in the structure plan (and in subsequent local plans).

AS.20.5 Strategic direction should be given towards the positive management of flooding, namely through flood plain restoration.

Noted, although flood management, such as flood plain restoration is largely a matter for the local plan and other council services.

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AS.20.6	Under the s1 of the Nature Conservation (S) Act 2004, a primary function of the planning system should be to further the conservation of biodiversity, which should underpin the entire structure plan. RSPB would wish to see a separate and prominent chapter on environment and biodiversity issues in the structure plan, showing some bold vision for restoration of biodiversity loss and the significant reduction of development impacts.	Acknowledge that the structure plan should further the conservation of biodiversity. However, the best mechanism to achieve this is through the structure plan's Strategic Environmental Assessment, which will identify those proposals that are likely to have significant environmental impacts, and require to be mitigated or reconsidered.
AS.20.7	RSPB would like to provide further comments on these issues to ensure that environmental and biodiversity conservation issues are not under-emphasised in the structure plan.	Noted.

Ryden Ms C Smith

AS.59.1	By 2010, Banchory will have had the opportunity to absorb the current development opportunities and will be able to accommodate housing development on a site at Deebank, adjacent to the current settlement boundary.	This is taken as being support for the edge of city settlements and key settlement strategies
AS.59.2	The identification of additional land for housing development in Banchory could help sustain Banchory Primary School - School Roll Forecasts suggest that this school will only be operating at 55% of its capacity in 2011. Although it is anticipated that Banchory Academy will remain over capacity in 2011, residential development could provide contributions to mitigate this.	Noted. It is entirely inconceivable that Banchory could lose its Primary School. It is not under threat and consequently is unlikely to require additional development to sustain it. Additional housing, provided for local need would be sufficient to maintain the primary school roll.
AS.59.3	The current structure plan provides for 200 dwellings between January 2006 and December 2010 within Banchory and also indicates that allocations between 2011 and 2015 are likely to be in the same broad proportions. It is anticipated that similar allocations would be identified for Banchory in future development plans, assuming that a similar development strategy is proposed.	No such assumptions can be made at this time. The preferred spatial strategy which will arise after a series of consultations and reviews by infrastructure and service providers will determine where development will be located within a strategic allocation over the plan period. Housing allocations will then be made accordingly.
AS.59.4	Using figures from the 2006 Housing Land Audit for the region and from Table 3 of the current Structure Plan, it is calculated that there is 4.5 years supply of housing land in the Aberdeen Housing Market Area. This figure falls short of the 5 year supply required by Structure Plan Policy 7 and so we believe that additional land needs to be released in due course. On this basis, we would be grateful if consideration could be given to providing additional housing allocations for Banchory in the forthcoming structure plan and suggest that the site at Deebank could be designated for residential use in a subsequent review of the Local Plan.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations for housing land shall then be made accordingly.

Scottish Enterprise Grampian Mr Colin D Mitchell

AS.60.1	Sustainable economic development is the priority issue to be addressed in the vision and this needs to be much more explicit than outlined in the issues paper.	Noted. This comment suggests that the vision should be re-worded to emphasise the importance of future economic development.
AS.60.2	The existing and planned physical and social infrastructure required for the area can only be supported by a vibrant and successful economy.	Noted.

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AS.60.3	The Structure Plan should provide the strategic spatial framework for the delivery of major economic development projects in the region and the broad vision and objectives of the structure plan should be consistent with "Smart Successful Scotland" and the ACSEF strategy.	Agreed.
AS.60.4	To ensure that the region remains an important contributor to the Scottish and UK economies, the appropriate quantity and type of land needs to be allocated for future business development.	Agreed.
AS.60.5	The land allocations of the plan should reflect the changing nature of business needs and the need to foster transition and growth from oil and gas to a wider energy economy and emergent new technologies.	Agreed. In addition to the need to provide for the growth and diversification of the energy industry and its related sectors, there will be a need to support wider economic objectives. For example, the current Economic Growth Strategy for the Aberdeen City and Shire Economic Forum also seeks to ensure that the region is a unique destination for visitors. It is important that the plan takes this into account.
AS.60.6	The structure plan should establish a development framework which facilitates and sets a clear market context for early investment in the strategic infrastructure required for the delivery of new development.	Noted. A technical evaluation of the spatial strategies will be undertaken with infrastructure and service providers to establish whether the spatial strategies can be delivered. This will allow infrastructure providers from an early stage to align their investment programmes accordingly.
AS.60.7	New development should be designed so as to encourage utilisation of other modes of transport, both to increase choice and also to mitigate the congestion and air pollution which are associated with increased car use.	Noted. We agree that the spatial strategy chosen needs to encourage modal shift.
AS.60.8	The significance of the role of the AWPR in reducing local and regional journey times and making journey times more predictable should be acknowledged.	This comment is noted. Impact on journey times will be considered in the evaluation of spatial options.
AS.60.9	The delivery of the Aberdeen Airport Master Plan should be an explicit transport objective.	This is a specific transport goal, which is better reflected in local and regional transport strategies.
AS.60.10	Aberdeen City and Shire needs to maintain a population providing the critical mass to make provision of the business social and cultural infrastructure that the community aspires to.	Noted. This is a fundamental aspect of the vision that has been proposed for the area.
AS.60.11	Clarity is required in the structure plan spatial strategy as to what this critical mass is in absolute population terms and how this should best be distributed across the region.	The concept of critical mass varies almost infinitely according to what facilities and infrastructure are being considered. Through the technical evaluation the plan will take into account the critical mass required to economically provide infrastructure for strategic allocations.
AS.60.12	The preferred spatial model should be to concentrate development and thereby ensure population growth along existing and planned transportation corridors to the South, west and North of the City. This will avoid the detrimental environmental and cost impacts which some of the alternative models require and would achieve the critical mass in relation to the provision of transport, business, social, and educational infrastructure.	Noted. This is taken as support for the "existing transport corridor", and of elements of the "new transport corridor" strategies.

AS.60.13	The image and perception of the area is important in competing for investment in an increasingly global economy.	Noted. This comment supports the idea that a high-quality environment will support economic growth.
AS.60.14	A tight green belt around the city has constrained development and contributed to escalating property values. The structure plan should consider more flexible and/or alternative approaches to the green belt issue as part of the spatial strategy.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The green belt may not be defined as a 'belt', but could take a number of forms including wedges of green belt between settlements.
AS.60.15	A balanced supply of housing land is essential as affordable housing is an important factor in attracting and retaining knowledge and skilled workers.	Noted
AS.60.16	Previous land release targets have been too tight with the result of an imbalance between supply and demand which has driven up new and existing house prices.	The reasons for house price increases are many and varied, and cannot be identified solely as a result of a constrained land supply. The Report of Survey (p77 /78) suggests house price growth over the last decade has been among the slowest in Scotland, even though prices have more than doubled. This comment is taken as supporting a high growth model within the strategy.
AS.60.17	Scottish Enterprise are interested in creating "Energetica"- a world class business, leisure and residential environment for all energies extending from the Aberdeen Science and Energy Park at Bridge of Don northwards to Peterhead. The opportunity to develop a strategic master plan for this area should be explored at an early stage in the process of developing the structure plan	Noted. It is the function of the land use planning authorities to determine the optimal distribution of development in the area through the development plan. The "Energetica " corridor is being promoted as one possible strategy for the future development of the area but, as far as we know, Scottish Enterprise Grampian has not previously undertaken land use studies which show that such a strategy is practicable, feasible or desirable. The concept of a development corridor is valid at a theoretical level, but unless it is proven to be practical, and is identified as being the consensus view of all stakeholders, it will not be possible to take Scottish Enterprise's vision forward in the manner suggested.

Scottish Wildlife Trust
Mr Douglas Gooday

AS.19.1	Under s1 of the Nature Conservation (S) Act 2004, a primary function of the planning system should be to further the conservation of biodiversity. Future Development Plans should include policies that aim to conserve biodiversity at all scales; include specific objectives for the protection and enhancement of biodiversity; include spatially explicit targets for the protection, restoration and strategic expansion of biodiversity, guided by local Biodiversity Action Plan priorities and Scottish Biodiversity Strategy aims and objectives; identify the location of designated sites and habitat networks in plans and development briefs; and include indicators for monitoring biodiversity on important sites and at an ecosystem scale (multiple species and habitats).	Noted. Detailed policies on heritage protection and designation are likely to be considered in future local plans rather than this structure plan due to the strategic nature of the document. However, as the structure plan will be subject to a Strategic Environmental Assessment and an Appropriate Assessment, any likely significant effects as a result of the spatial option chosen will be identified and remedial measures identified. Once the plan is approved, it will be monitored to identify any possible significant impacts and remedial action(s) required.
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South Ardo

Mr David Fleming

AS.9.1	Methlick should develop in accordance with the ideal of providing enough people to support the facilities and services the community wants, as suggested in the draft vision.	Noted. This is taken as support for a level of development opportunity across rural Aberdeenshire to support local needs
AS.9.2	The Aberdeen Western Peripheral Route will have a large effect on the travelling and commuting patterns of Aberdeenshire residents.	Noted. If the Aberdeen Western Peripheral Route is realised, there is likely to be a change in the way in which the current road network is used. This might not mean that travel times will improve for all road-users, unless complimentary steps are taken to improve public transport, as well as the design and capacity of other parts of the road network. These issues should be dealt with by the Regional Transport Strategy. If a future Aberdeen Western Peripheral Route is to have a positive effect on travel times, the strategy chosen for the structure plan must facilitate supplementary transport-related improvements.
AS.9.3	The development of the Aberdeen Western Peripheral Route will make the Tarves/Methlick area a more attractive place to live.	If the Aberdeen Western Peripheral Route is realised, there may be a reduction in travel times between this area and Aberdeen, the extent to which people would be encouraged to move to this area by a reduction in travel times will vary depending on individual preferences and needs.
AS.9.4	The assumption against new housing in the Methlick area is stifling its economic and social development.	The issue of new housing in the Methlick area is more of a local plan issue than a strategic issue.
AS.9.5	There are significant planning merits for a small planned development at South Ardo (e.g. on a 5.9 Ha site we have in mind).	The envisaged scale of development is small; the proposal is not considered to be a strategic issue.

Stonehaven & District Community Council

Mr David Fleming

AS.72.1	We would like to see more reference on the investment needed to achieve the vision - where are the structural guarantees that the money raised through council tax and developer contributions is going to be sufficient to truly support good local services?	Noted. The plan will be supported by an action plan, which will set out what needs to be done by different parties, to achieve the vision.
AS.72.2	The plan should be seeking to avoid depopulation, and making Aberdeenshire an attractive place to live and work in, so as to keep a strong wealth creating core of the population.	Noted. This is taken as support for a strategy of medium growth. It is also taken as support for the aims in the vision of maintaining and improving quality of life.
AS.72.3	In relation to the statement in Q2, you can have the population but not the usage of facilities and services, as they are not maintained to a high enough standard or through competition elsewhere. Population alone is not enough to sustain services and facilities, it is a matter of appropriate resources and investment to ensure appropriate standards.	Noted.

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AS.72.4	In recognising the demographic changes, all new properties built (either for commercial or residential purposes) need to be of the highest possible access standards. In respect of homes, these need to be built to a lifetime standard in order that they can be adapted and altered in future.	Design standards and housing layout will be addressed in the future local plans.
AS.72.5	Local services should be accessible to people from other cultures as they will increasingly represent the younger working population who will be required to provide care and services for the increasingly older population.	The plan will seek to locate development close to services so that these services are more accessible.
AS.72.6	In order to have vibrant and sustainable communities, investment in learning (higher/further education) will be required at all levels to encourage young people to stay or return after further education, as well as to allow older people to stay active. This will involve adequate transport links with other areas and across the region as well as quality amenities distributed across the range of satellite towns and villages, not just in the city centre.	Noted. This supports the strategy of development in growth poles.
AS.72.7	Need to develop smart technology approaches (e.g. telecare) to enable people to live independently and for longer.	This is not an issue for the structure plan.
AS.72.8	We should actively encourage mixed estates where the architecture does not distinguish between tenure. Small communities should be built/regenerated (probably based on existing villages and communities) that have, as much as is possible, all that they need locally. Regeneration needs to be cross discipline and not concentrate on housing and/or industry or leisure but should be tackled from a whole community perspective.	Noted. The structure plan can allocate land for brownfield development although it cannot control how regeneration projects are delivered.
AS.72.9	We need to ensure that communities in danger of failing are quickly identified and adequately resourced, across a range of services in a holistic manner, to prevent decline.	The structure plan cannot allocate resources for services for declining communities. The community plan will identify the necessary services required for communities.
AS.72.10	We need to ensure adequate links and amenities for all - both young and old, regeneration schemes should address local needs, and failing communities need to be identified and resourced accordingly.	The structure plan is a plan for the vision for the future, and will deal with the need for development land in that context. Meeting needs from new development is clearly a part of this. The issue of resourcing "failing" communities is one for the Community Planning process rather than the land use planning process.
AS.72.11	Should actively encourage mixed estates where the architecture does not distinguish between tenure. It should be a condition of planning permission that each development is balanced, and include affordable housing and sheltered accommodation.	Design standards and housing layout will be fully addressed in local plans. The Councils, in conjunction with private developers and housing agencies, shall seek to secure appropriate levels of affordable and special needs housing. The means and general level of provision will be outlined in local plans.
AS.72.12	It is important to be aware of changes of use within settlement (not just in conservation areas) which start to change the character of the area e.g. changing large houses in flats or offices.	Noted. The changes of uses is primarily a local plan issue.

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AS.72.13	Design must include more sustainability, and should also be applicable to additions and extensions to existing properties. We believe the issue of density is missing in the consideration of housing. Several housing estates in Stonehaven are densely packed, which may not be the preferred choice. There is plenty of land to build on in Aberdeenshire.	Noted. These are issues more appropriately considered in the context of the next local plans. With regards to land availability, although there may not be any visible constraints, water, waste, pipe safeguarding zones, and heritage designations for example, can restrict the amount of land that is available for development.
AS.72.14	Retail planning must not be driven solely by the wishes and activities of the large national players. The genuine impact of large superstores on local retail centres needs to be addressed. Allowance should be given to retailers (many of whom are small traders) who cannot afford to build their own premises, but wish to rent/lease shops.	The land use planning system has little influence on tenure of properties. National planning policy on retailing requires that the impact of retail proposals on local centres is addressed.
AS.72.15	We need to consider the type of planning conditions that may have to be imposed and upheld to give small retailers a chance of survival, and well as the appropriate enforcement regime required to ensure compliance with these conditions.	The detail of conditions which may be placed on retail policies is a matter for local plans. Enforcement policy is an issue for Development Management, not planning policy.
AS.72.16	More encouragement should be given to existing industries to improve, grow, change, and develop. As agriculture declines, more land needs to be devoted to other work in pleasant surroundings e.g. business parks.	Noted. It will be important to provide a range and choice of sites for employment purposes, to suit the diverse requirements of different industries and businesses.
AS.72.17	Investment in public transport is required to enable workers to travel to remote locations without adverse impact on the environment.	Noted. This is an issue for the local transport strategy
AS.72.18	"Integrated public transport" is increasingly important to encourage the move away from car and air travel. The interchange facilities must be positively planned for.	Noted. This is an issue for the local transport strategy
AS.72.19	The document says: "Reduce the need to travel and encourage people to walk, cycle etc". Encourage is a weak word in this context and emphasis should be given to the provision of cycle lanes, bus lanes and more flexible public transport options.	The Local and Regional Transport Strategies set the transport policies for the region and it is through these strategies that measures should be suggested regarding the provision of the transport-related infrastructure for the region. The structure plan could however assist in addressing this issue, by providing a strategy for the development of the region that provides a critical mass of users in appropriate locations, therefore making the provision of such infrastructure feasible. It is noted that this comment supports the integration of transport and land-use planning.
AS.72.20	For each local area the development requirements should be identified (e.g. housing or employment land) and any specific type of development outstanding should be addressed. For example in Stonehaven, the plan should show a increase in recreation, retail and business spaces, and minimal increase in large housing developments.	The local plan will identify sites for appropriate uses.
AS.72.21	Standards should be set for both new and existing buildings to reduce energy consumption. This includes local heating/generation schemes, reduced lighting waste, lowering the carbon footprint of new roads, etc.	Noted. This is not an issue for the structure plan.
AS.72.22	Heritage must not be used as an excuse for doing nothing and allowing older buildings to deteriorate. Positive encouragement for the sympathetic development of heritage sites must feature in future plans.	Noted.

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AS.72.23	The plan needs to consider what we are to do with existing areas, are we going to redevelop them or let them decay?	Noted. Identifying broad areas in need of regeneration is one role the structure plan could fulfil.
AS.72.24	The structure plan needs to look at existing areas and what they need to bring them to a modern standard, and what needs to be done to them to make them vibrant and viable.	The structure plan is concerned with new development, and cannot directly address the deficiencies of areas. Other plans, such as service plans and the community plan can seek to address these issues.
AS.72.25	New development should not take place up the Braes or in visually intrusive locations around Stonehaven. The preference is for a small amount of land west of the A90. The "future of Stonehaven" document speaks to some of these issues	Noted. The comments support a small level of growth in Stonehaven, and can be taken as support for a level of development commensurate with local needs.
Strutt & Parker Mr John Wright		
AS.37.1	The vision will facilitate the growth of communities in a sustainable manner that meets the housing, economic and environmental needs and demands of a twentieth century society.	Noted.
AS.37.2	Tourism and tourist related development should be included in the Issues Report.	Noted.
AS.37.3	Rural issues are not adequately addressed in the thirteen issues in the issues report and it may be that this is another issue to be addressed.	While the issues report does not address rural issues in isolation, all the issues are relevant to both urban and rural content.
AS.37.4	In order to maintain a population large enough to improve the services, promote the wider interests of the community and improve quality of life, it will be necessary to adopt a strategy to promote a dispersed distribution of development which focuses smaller housing allocations in rural areas to provide the critical mass to attract the investment required in public transport, facilities and services in the area to sustain communities and facilitate further growth.	The scale of development required to provide the "critical mass" to overcome serious infrastructure and service deficiencies is such that rural communities could be swamped by an unprecedented scale of development. A spatial strategy to concentrate development in certain areas provides this critical mass, but in other areas maintenance of the existing circumstance is probably the best that could be achieved. A "dispersal " strategy has been considered and dismissed for this, and other, reasons.
AS.37.5	A dispersed distribution of development strategy will not only assist in addressing affordable housing issues being experienced in many rural housing market areas but also reduce the pressure on the Aberdeen City green belt and will direct development to sustainable locations.	Affordability of housing in rural areas is an issue of local need and could be addressed in that way . A dispersed settlement pattern is not sustainable and would have little impact on pressures associated with Aberdeen City green belt.
AS.37.6	Following guidance set out in SPP21 which advocates a review of the greenbelt, a reassessment of the Aberdeen City Green Belt should be carried out and the boundaries should be redrawn to provide for planned long term growth along public transport corridors.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.

AS.37.7	It is considered that the housing market areas are too simplistic in their current form and require review to take into account local circumstance	DTZ have carried out a study of the Housing Market areas in the region. We are currently reviewing these findings and the implications they will have on planning policy.
AS.37.8	In order to target the number and type of homes built to meet the needs and hopes of the population, more smaller allocations, particularly in the rural areas, should be provided for in the structure plan, which can then filter down to the local plans.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document. The plan will make an allocation for rural and local needs and a greater strategic allocation for the preferred spatial strategy. The divide of these allocations together with the appropriate scales and locations for development will be determined after carrying out a series of community and stakeholder consultations. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered.
AS.37.9	Provision for modern retail provision in areas of demand should be made and areas demonstrated to be inappropriate for retail development should be reallocated for other uses.	Noted. The Aberdeen and Aberdeen Retail Study identifies areas of demand and this will form the basis of a hierarchical approach to retail planning in the City Region. Site specific allocations are a matter for the local plan.
AS.37.10	In order to help the area be as economically successful as possible and deal with economic uncertainty, provision should be made for areas which are demonstrated to be inappropriate for business development to be reallocated to other uses.	Noted. It is not clear how the reallocation of employment land allocations would promote economic success. Part of the problem that we currently face is due to the shortage of employment land caused in part by its short term reallocation.
AS.37.11	Reducing the need to travel and encouraging people to walk, cycle, use buses and trains may not be possible until the critical mass of population is in place to provide for, and justify, the investment required to enhance public transport provision to a position where this is possible.	Noted.
AS.37.12	In order to achieve the aim to "tackle the causes and effects of climate change, including carbon use, rising sea levels and more flooding", direct reference should be made to recently published SPP 6 on renewable energy and recently revised Part L of the building regulations relating to sustainability in new development	Noted. Consideration will be given to the requirements of SPP6 on the structure plan.

The Ferryhill Heritage Society

Ms Connie Leith

AC.14.1	Heritage, culture and tourism need to be given very high priority.	Noted.
AC.14.2	We remain to be convinced the AWPR will resolve congestion problems.	Noted. Although the structure plan can assist with tackling transport-related problems (e.g. the need to travel for work and leisure) through managing the development of land, it does not directly seek to determine how and when new roads and transport links should be provided across the region. Specific transport policies for the region are provided by the Regional Transport Strategy and by the Councils' Local Transport Strategies.

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AC.14.3	Development on the "green fingers" around Aberdeen will only benefit developers and will result in loss of green space	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The specific structure of the green belt (e.g. a 'belt' or wedge) will depend on the outcome of the review.
AC.14.4	More detail is required as to what "appropriate development" in the green belt might be	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt has yet to be undertaken.
AC.14.5	More small houses for rent or at affordable prices are required for the elderly and disabled.	Noted.
AC.14.6	Developers should not be allowed to make cash payments to build affordable housing elsewhere	Noted. The Council will follow guidance set out in PAN 74 which stipulates that where sites are unsuitable for affordable housing, for example, because of location or local circumstances, developers may offer to provide the contribution on another site within their ownership or in some cases provide a commuted sum, as long as the proposed alternative will help to meet an identified need in the same housing market area.
AC.14.7	Good affordable transport to the city centre is required for the disabled and the elderly in both the City and Shire	This is not an appropriate issue for the structure plan. The Regional and Local Transport Strategies set the transport policies for the region.
AC.14.8	Most recent developments are ugly! Developments should be refused if they are of a poor design	These are issues more appropriately considered in the context of the next local plans.
AC.14.9	A better road system to and from the City is required. Heavy vehicles should not be allowed to use our narrow and historic streets, or those near schools	Noted. Regeneration may provide opportunities to improve the road system. Access by heavy goods lorries is a matter for the transport authority to consider. The construction of the AWPR will remove some of this traffic from Aberdeen.
AC.14.10	Park and Ride has not worked and the sites should be sold off.	Noted. Park and ride works very well in some areas. Disposal of the park and ride assets may be premature in the face of increasing costs of private transport and increasing levels of congestion. Considerable effort is being expended on making park and ride more attractive to potential users.
AC.14.11	Aberdeen's public transport is the most expensive in Scotland. Could it be because there is no competition?	This is not an issue that the structure plan can address.

AC.14.12 Heritage groups require to be added to the list of bodies to be consulted.

The development plan scheme does not contain exhaustive lists of those we propose to consult with. The list extends to over 1,000. The development plan scheme will be reviewed in 9 months time and consideration will be given then to including Heritage Groups.

The William Cowie Partnership
Mr William Cowie

AS.5.1 A greater emphasis should be placed on promoting appropriate opportunities for housing in and around existing rural settlements across Aberdeenshire where the key criteria identified in SPP15 can be met.

The structure plan will identify the most appropriate locations for all types of new development through a preferred strategic option which will arise after a series of consultations. The comment supports a strategy of reserving land elsewhere to meet local and rural needs.

The William Cowie Partnership (Kingseat)
Mr W G Cowie

AS.38.1 Greater emphasis should be placed on promoting appropriate opportunities for housing in and around existing settlements across the whole area, and not necessarily focusing the majority of development within the Aberdeen Housing Market Area.

Noted. This comments supports the 'Growth Pole' spatial strategy.

AS.38.2 The current structure plan pre-dates most the recent planning policy guidance and advice from the Scottish Executive, which are aimed at creating a more positive approach to housing oppotunties within rural areas.

The new structure plan will take account of all national guidance and other strategies etc.

AS.38.3 In light of Scottish Planning Policy 15: Rural Development, greater consideration should be given to the share of total housing allocations to small settlements and the rural area in general.

Noted. This comment appears to support the 'Dispersal' spatial strategy/option.

AS.38.4 Future allocation for rural areas should be proportionately increased so that development is evenly spread to a wide variety of area, particularly where the key critieria (e.g. proximity to serviecs, infrastructure provision, design) in Scottish Planning Policy 15: Rural Development can be met.

Noted. The comment appears to support the 'Dispersal' spatial strategy/option. However, the level of detail proposed (i.e. listing key criteria for when development in rural areas is permitted) would be more appropriate in the local plan.

AS.38.5 We concur with the Issues Report statement on balancing needs between Aberdeen and towns and villages. The strategy needs to strike a better balance than what has been shown previously by being more positive towards appropriate development on the edge of existing towns and villages.

Noted. This is taken as support for a strategy that allows growth in Aberdeenshire settlements to meet local aspirations.

AS.38.6 The strategy needs to strike a better balance by being more positive towards appropriate development on the edge of existing towns and villages, as a result, promoting a range of new housing in many more communities. Kingseat is identified as having scope for expansion.

The preferred spatial strategy which will emerge after a series of consultations and reviews by infrastructure and service providers will determine where the majority of development will be located within a strategic allocation over the plan period. The plan will also take into consideration guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community.

The William Cowie Partnership (Slains Castle)

Mr W G Cowie

AS.39.1	The structure plan must not necessarily allocate the majority of development to the Aberdeen Housing Market Area. A greater emphasis must be placed on promoting appropriate housing development in and around settlements across the whole of the region.	The current operation of the housing market areas are currently under review. The preferred spatial strategy which will arise after a series of consultations and reviews by infrastructure and service providers will determine where most development will be located within a strategic allocation. A smaller allocation may also be made to reflect local need
AS.39.2	In view of the positive statements on rural housing provided in SPP 15, it is expected that the structure plan will give consideration to increasing the proportion of housing allocated to small settlements and the rural area in general.	The preferred spatial strategy which will arise after a series of consultations and reviews by infrastructure and service providers will determine where most development will be located throughout the region within a strategic allocation. A smaller allocation may also be made to reflect local need.
AS.39.3	The current split of housing allocations between the Aberdeen and Rural Housing Market Areas is not appropriate; development should be more evenly spread to a wide variety of areas.	DTZ have carried out a study of the Housing Market areas in the region. We are currently reviewing these findings and the implications they will have on planning policy. The preferred spatial strategy which will arise after a series of consultations and reviews by infrastructure and service providers will determine where most development will be located within a strategic allocation.
AS.39.4	A strategy that seeks to spread housing development evenly across a wide variety of areas would be consistent with the draft vision set out in the Issues Report.	The vision is a statement of aspiration for the region and not a statement that addresses the question of how development should be distributed. The aims and objectives for the plan will be drafted to reflect the vision and the issues that the plan should tackle; these will provide the land-use planning goals for the region, so as to facilitate the realisation of the vision. As the objectives have not yet been drafted, it cannot be said that they either conflict with or support the land-use strategy mentioned.
AS.39.5	The structure plan strategy needs to strike a better balance between strategic and local needs, by being more welcoming towards appropriate development on the edge of existing towns and villages. This would help promote a range of new homes across the region.	Noted.
AS.39.6	There is scope for development in areas close to key settlements, in the northern part of the region e.g. Slains Castle, Cruden Bay.	Noted. Cruden Bay is not a "key settlement" as we would normally class such things. This is taken as support for the "key settlement" strategy

Transport Scotland

Mr M Forsyth

AS.57.1	The draft vision effectively highlights the importance of locating future development in a sustainable manner.	Noted.
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AS.57.2	Development should be located in areas which promote the interrelationship between land use and transportation.	Noted.
AS.57.3	Areas of potential land use development should accord with current policy and advice including SPP1, SPP3, SPP8, SPP17 and PAN 75, integrating developments with existing or future public transport services and facilities.	Noted
AS.57.4	Developments should present a modal choice and reduce reliance on the private car, facilitating a mode shift and promoting movement by walking and cycling where possible, encouraging these modes to be the dominant mode of transport.	Noted. Transportation will be a key element in determining the preferred spatial strategy.
AS.57.5	Where a new access to the trunk road network is being considered within the transport accessibility assessment for a specific land use allocation, full and detailed justification of such a strategy will require to be provided.	For the majority of the spatial strategies, it is likely that there will only be a need to upgrade existing junctions. For those options that propose a new access, it is likely that the scale of the new development would require a significant upgrade to the road itself. However, the comment is noted.

Transportation & Infrastructure
Mr Ewan Wallace

AS.69.1	It is of greatest importance to ensure that the vision is clearly linked to the Strategic Visions of each Council, that it reflects the intended outputs of the new plan and that it is meaningful to those who will use the plan. The draft vision does seem to miss the target on the first and last of these requirements.	Noted. What the vision will mean for future users of the plan will be spelled out through the drafting of appropriate objectives, based upon the vision.
AS.69.2	The spatial dimension to population is key for the provision and maintenance of transport services and infrastructure; also for the provision of business opportunities.	The pattern of development that the structure plan will prescribe has taken cognisance of the fact that in order to provide sufficient infrastructure and services it is necessary to allocate a critical mass of development to make these provisions feasible.
AS.69.3	The second strategic option would seem to offer a planned approach that could help improve services.	This is taken as support for an existing Transport corridor / Aberdeen City strategy.
AS.69.4	Changes in the population impact on the provision of transport and infrastructure, by effecting the availability of a skilled workforce to deliver infrastructure and services; such changes also affect the demand for services.	Noted.
AS.69.5	It would be worth considering how the Structure Plan could assist in enabling access to funding at the Scottish, UK and European levels, to help realise regeneration projects across the region. This would provide a clear linkage to the economic development priorities of the Councils and to ACSEF.	Noted.
AS.69.6	The requirement to balance needs, demands and hopes of all communities across the area clearly links to all aspects of the work of Transportation and Infrastructure, for the delivery of services constantly has to consider these factors.	Noted.

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AS.69.7	The review of the green belt will have to take into account implications of major projects set out in the National, Regional and Local Transport Strategies e.g. Park and Ride sites, Crossrail and the AWPR.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans.
AS.69.8	The delivery and design of new developments will have to allow for the key policies in relation to walking, cycling, public transport and parking, whilst still allowing good access to the available workforce. This should all fit within the need to maintain the attractiveness of individual sites.	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.69.9	The way in which the plan seeks to tackle the issue of economic potential will have to be linked to the work being taken forward by ACSEF, which sets the objectives for the development in key sectors to offset the eventual fall in direct oil employment.	Agreed. The structure plan will have to take cognisance of this, and other, initiatives.
AS.69.10	The region's future economic performance is one of the main aspects of the draft vision and should be prioritised accordingly.	Noted.
AS.69.11	In addition to looking at how travel behaviour can be changed, the structure plan will also have to look at how people and goods can be moved as efficiently as possible through safe and high quality connections. The National, Regional and Local Transport Strategies are core documents to inform this area of the plan, along with planning policy documents and advice notes.	Agreed.
AS.69.12	The correct locational approach to development can improve existing infrastructure and service provision or provide brand new facilities.	Noted
AS.69.13	In locating future development, in addition to considering the provision of new infrastructure, there also needs to be consideration of the provision of on-going services such as public transport. This will become increasingly important for the long-term maintenance of assets.	Noted. The preferred spatial strategy will arise after a series of consultations. The strategies will also undergo a technical evaluation with infrastructure and service providers to establish whether they can deliver the necessary requirements to serve the proposed pattern of development.
AS.69.14	The likely continued demand for travel needs to be allowed for by the encouragement and requirement to provide sustainable and energy efficient travel options for all new development proposals. Such a policy is key in meeting the commitments on climate change.	Noted.
AS.69.15	Continued climate change will have an impact upon future maintenance of infrastructure.	Noted.
AS.69.16	Initiatives such as the Aberdeenshire Towns Partnership and Nortrail provide the new plan with excellent examples to build upon, in terms of considering the region's Heritage.	Noted.
AS.69.17	Some key principles that should influence the spatial strategy are: the need to be as energy efficient as possible in areas such as transport and the construction of new buildings, and the need to lock in the benefits that will be brought by projects such as the DF1 proposals and the AWPR.	Noted. These are among others elements which will influence the strategy.

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AS.69.18

There are a number of factual inaccuracies in the section on Transport. Some are due to the passage of time and to the emergence of new documents. These inaccuracies should be corrected.

The Report of survey has been developed from existing data sources . Many of the detailed criticisms are valid and will be considered again if or when an updated report of survey is produced.

trudebacon@hotmail.com

Ms Trude Bacon

as.17.1

Westhill is getting far too big - there should be no more building work done here.

Noted.

as.17.2

Development on the golf course at Westhill should be prevented. The golf course should be considered as a green belt.

This is not a structure plan issue; local plans identify particular sites for development, although they are guided by the development strategy and the policies of a structure plan. It is noted that this comment supports the view that significant development should not occur in Westhill.

University of Aberdeen

Mr A M Donaldson

AC.10.1

The university will have an important role to play in the future of the north east in stimulating "intellectual excellence", and has a leading role in promoting culture and supporting economic investment.

Noted.

Westfield

Mr Bob Flann

AS.10.1

How do you maintain population? A decline in birth rate will result in a decline in the need for housing

Planning for decline is not consistent with the draft vision. The issue highlighted reinforces the need for positive policies to avoid decline.

AS.10.2

More elderly people require less change, unless acceptable sheltered housing keeps them in their home area

The underoccupation of large houses by an increasing elderly population is a growing problem, which has implications for the housing land supply. The need for acceptable sheltered housing is noted

AS.10.3

Workers from Eastern Europe are only short term

Noted. This is not a structure plan issue

AS.10.4

Local needs are often overridden by the desire of developers to make profits, resulting in adverse impacts on the existing communities.

Overdevelopment of villages may not result in sustainable communities, but by the same token the need for housing and employment land needs to be addressed. As a general principle development proposals need to be in scale with existing communities to ensure that character is maintained.

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AS.10.5	There is no such thing as appropriate development in the green belt.	Scottish Planning Policy 21: Green Belts, allows the development plan to specify which developments are appropriate in the green belt. This is likely to be an issue considered by local plans.
AS.10.6	More adventurous architecture needs to be considered to create interest	Noted.
AS.10.7	How can people be persuaded away from the convenience of their car?	Noted. If we cannot compete against the convenience of the motor car then reducing the need to travel increases in importance
AS.10.8	Open spaces are often infilled without due regard to local issues	Noted. There is sometimes a conflict between using previously developed land and maintaining amenity.
AS.10.9	New infrastructure is often built without capacity for future development	It is common for developers to provide only the facilities that they need, rather than subsidising future development by providing spare capacity. A long term plan gives certainty for such investment, and identifies those places where infrastructure will be required in the foreseeable future.
AS.10.10	Land based wind turbines are considered by most people to be a blot on the landscape	The view is noted. There is a trade off between landscape conservation and the need to meet carbon reduction requirements.
AS.10.11	The vision needs to acknowledge the impact of infill on local communities	Noted.
AS.10.12	The distribution of development is wholly influenced by who wants to sell land to a developer who wants to build.	While the market is an influence, the planning system controls the distribution of development and enables communities to influence this.
AS.10.13	The issues paper is too wordy and will not engender debate. Could it be condensed and sent to everybody, urging them to contact the Community Council or the Planning Authority.	In essence that is what the "Getting Involved" leaflet attempted to do. It is difficult to draw an appropriate balance between brevity and detail that will stimulate discussion.

Westhill & District Residents' Association

Mr Ron McKail

AS.66.1	There should be a range of housing, but with particular emphasis on affordable housing, properties for rental, sheltered housing and housing association properties.	Noted. The plan will take cognisance of guidance set out in SPP3 which states that a range of house types is needed to provide for the needs of all in the community.
AS.66.2	An increasing number of houses are being built but with little attention being paid to the requirements and demands for services such as schools, roads, health provision.	All developers are required to mitigate the impacts of their development through the provision of developer contributions towards infrastructure and services.

AS.66.3	Any new development should start from scratch, in a completely separate area and should have good access to the Aberdeen Western Peripheral Route.	This is taken as support for a new settlement based strategy.
AS.66.4	Future developments should not be too close to the existing Westhill community.	Noted.
<p>William Lippe Architects Ltd for Alan Grant Ltd Mr W G Lippe</p>		
AS.42.1	The language used in the first paragraph is so overblown that it will lead to derision (ridicule); "We will strive to achieve. . . for our communities" would be less inflated and suggests something that could be attained through appropriate effort.	Noted. The vision is an aspirational statement and is intended to provide a positive target that the future land-use development of the region can contribute towards. The alternative phrasing for the first paragraph will be considered.
AS.42.2	People should be enabled to live in the region without everything being directed to Aberdeen and a handful of settlements in Aberdeenshire.	Noted, however the contribution of new build to all house sales is relatively modest. It is recognised that the balance of the chosen strategy will require careful consideration.
AS.42.3	When identifying land for development, the structure plan should be more responsive throughout its lifetime by a rolling programme of regular reviews.	Structure plans will be reviewed every five years. Action Programmes should help in the implementation of the plan.
AS.42.4	While conventional strategic considerations in the NE is focussed between development in Aberdeen against everything else in its rural hinterland, the social, economic and political reality for Aberdeenshire itself must take account of the structural hierarchy of large town, small town/village and countryside, which planning policies should reflect. NEST Policy 12 (House building in the Countryside beyond the green belt) appears useful, but its interpretation and implementation make it difficult to comply with and worthless. It provides little opportunity for individuals seeking a reasonably sustainable version of a 'house in the country' or to cohesive groups.	Noted. The comment made acknowledges Aberdeen City's place within the hierarchy of settlements within the Aberdeen City and Shire area and seeks to promote a role for "houses in the countryside" within this hierarchy. This is taken as support for a strategy that reflects a need for development to meet local needs and aspirations as well as serving the needs of the City region.
AS.42.5	Concerned that any future green belt might restrict development permitted within it, as implemented in NEST Policy 28. Unused buildings (e.g. attractive steadings) are unable to be converted due to the limited uses permitted along the urban fringe, which is resulting in the growth of an area of minor rural dereliction.	Noted. In line with Scottish Planning Policy 21: "Green Belts", the need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt (if required) has yet to be undertaken.
AS.42.6	The needs and hopes of the population in terms of number and types of homes that can be built and in their location should be taken account of.	We are currently carrying out a series of community and stakeholder consultations to gauge opinion on the appropriate scale of land that should be released for development when it should be released and also the preferred locations for development. A technical evaluation will then be undertaken with infrastructure providers to establish whether these preferences can be delivered. Allocations shall then be made accordingly.

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AS.42.7	The misapplication of the principles of sustainability has already led to an over-concentration of development in Aberdeen and the large towns of the NE. Small towns can be sustainable also, up to the limits set by local services (e.g. schools, services and shops). The greater part of Aberdeenshire should not be denied the opportunity to see the development of the sort of housing many people want in an environment rather more congenial than commonly found in urban areas.	The approach set out appears to support the "dispersal" spatial option. However, no survey results stating where people prefer to live has been provided. As a result, the comment is subjective. The Housing Needs Assessment sets out a more accurate picture and should be considered during the development of the structure plan and appraisal of the spatial options.
AS.42.8	It is evident that either insufficient employment land has been provided or that it has not been distributed properly. The Blackburn-Inverurie corridor has no employment land available. The new structure plan must ensure that sufficient land is allocated from the beginning or that an effective process for continual review of the plan is put in place.	Noted. The amount of employment land required to meet future needs and regional aspirations for growth will be discussed as part of the technical assessment of the possible strategies for the plan. A regular review of the final plan, after it has been adopted, is envisaged.
AS.42.9	Effective public transport for rural communities is the key to achieving an appropriate level of sustainability. Buses are the key, but they need to be convenient, reliable, clean, comfortable and reasonably priced.	The Regional and Local Transport Strategies set the transport policies for the region and it is in these documents that specific measures relating to the provision of public transport - including the quality of bus services - are found. This is not an issue that the structure plan can address.
AS.42.10	More consideration should be given to providing medium-distance park and ride facilities (e.g. from Ellon to Aberdeen) from a range of strategically placed transport nodes selected throughout the rural commuter belt of the city.	The Regional and Local Transport Strategies set the transport policies for the region and it is in these documents that specific measures to address the region's transport problems are found. The provision of park and ride facilities can help to reduce levels of commuter traffic and this could be an important consideration in deciding which strategy for the future development of the region should be adopted by the structure plan.
AS.42.11	It is essential that the water and sewerage constraints are resolved, as it seriously impedes most parts of the development industry.	There is insufficient funds for infrastructure providers to solely resolve constraints and therefore developer contributions are essential to resolve the situation and mitigate the impacts of their developments. SEPA and Scottish Water are also involved in the Technical evaluation of the Strategic Options.
AS.42.12	Identifies Whiteford and Pitcable (5km/2miles from west of Inverurie) as areas with development potential for residential and employment as a serious strategic location. The client states that this development would allow the consolidation and regeneration of the two villages to reach a size where they can be sustainable; enhance the community's social, educational and economic needs; and the site is well placed in relation to the A90 trunk road, providing an attractive and sustainable location.	Noted. This is taken as support for development in the existing transport corridor, or for the creation of a new settlement through the amalgamation of existing villages. Whiteford and Pitcable are adjacent to the A96, not the A90 as stated.

William Lippe Architects Ltd for Colin Tawse

Mr W G Lippe

AS.43.1	The language used in the first paragraph is so overblown that it will lead to derision (ridicule); "We will strive to achieve. . . for our communities" would be less inflated and suggests something that could be attained through appropriate effort.	Noted. The vision is an aspirational statement and is intended to provide a positive target that the future land-use development of the region can contribute towards.
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AS.43.2	The vision should state that we need to be careful and considered in our approach and mindful in our stewardship of the land. Development in itself should not be considered to be a bad thing.	Noted. This comment suggests a re-wording of the vision to emphasise the practical requirements of seeking to achieve sustainable development.
AS.43.3	The structure plan certainly could determine where - and how much - development should take place, however it would be better if it could be made to be more responsive throughout its lifetime, by a rolling programme of regular reviews.	Action plans and a monitoring framework will be put in place. The Planning etc Scotland Act 2006 will require that the plan is replaced on a five yearly cycle.
AS.43.4	People should be able to live throughout the entire area of the city and shire. It shouldn't be the necessary to direct the vast majority of development to Aberdeen and the three or four largest towns in Aberdeenshire.	The structure plan will identify the most appropriate locations for all types of new development through a preferred strategic option which will arise after a series of consultations. A strategy of dispersal has been considered and dismissed. This view supports allocations reserved to meet local and rural needs.
AS.43.5	The Councils must take account of the structural hierarchy of large town, small town/village and countryside within the region and this hierarchy must be reflected in planning policies. The conventional distinction between the Aberdeen and Rural Housing Market Areas is insufficient.	We agree that cognisance has to be taken of the settlement hierarchy, but that we should also, as part of the vision be seeking to identify the future hierarchy, and developing a plan to deliver this. We note the views expressed regarding the difficulties with using the Housing Market Areas as a planning policy tool.
AS.43.6	The interpretation and implementation of NEST Policy 12: House Building in the Countryside Beyond the Green Belt has been such that this policy is almost worthless.	Noted.
AS.43.7	NEST Policy 27: Green Belt (and its ALP derivatives) has been applied in an over-stringent manner - plans to convert redundant agricultural buildings have been rejected in favour of allowing these structures to become derelict. The purpose and function of the green belt is of general concern.	Noted. In line with Scottish Planning Policy 21: "Green Belts", the need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt (if required) has yet to be undertaken.
AS.43.8	It is vital that full and proper account is taken of the needs and hopes of the population, both in terms of the number and types of homes that can be built and in terms of their location.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document. A series of consultations are being carried out with communities and stakeholders to establish the preferred scale of development that should take place over the plan period.
AS.43.9	Misapplication of the principles of sustainability has led to an over-concentration of development in Aberdeen and the large towns of the region. Development in small towns can also be sustainable, up to limits set by thresholds such as schools and provision of local services. It would be a mistake if the greater part of Aberdeenshire were denied the opportunity of obtaining the sort of housing development desired.	The preferred spatial strategy which will arise after a series of consultations and reviews by infrastructure and service providers will determine where most development will be located within a strategic allocation. A smaller allocation will also be made to reflect local/rural needs. Guidance set out in SPP15 which states that small towns should be self sufficient and able to maintain their function in the local economy will be taken into consideration when allocations are being made.

AS.43.10	The Councils must ensure either that sufficient employment land is allocated in the plan, to cover the plan period, or that an effective process for the continual review of the employment land allocation is put in place.	Noted. The amount of employment land required to meet future needs and regional aspirations for growth will be discussed as part of the technical assessment of the possible strategies for the plan. A regular review of the final plan, after it has been adopted, is envisaged.
AS.43.11	For public transport to be attractive in rural areas, the quality of bus services (e.g. standards of reliability, cleanliness and convenience) must improve. Consideration must be given to the provision of further park and ride facilities at a distance from Aberdeen, like the Ellon Park and Ride site. Such facilities could be provided at a range of strategically placed transport nodes, throughout the rural commuter belt of the city.	Noted. Providing opportunities for enhanced public transport links is a key rationale for the implementation of a spatial planning strategy, allowing targetting of resources and the development of a sound business case.
AS.43.12	In recent years, and currently, the uncertainty created by Scottish Water - their unwillingness or inability to regard a commitment as binding - has been a serious impediment to most parts of the development industry. It is essential that this situation is resolved and that strategic planning at a local authority level is given primacy.	Noted.
AS.43.13	The realisation of the AWPR will present development opportunities at the major interchanges. Development at these locations would constitute sound economic use of a major capital investment.	It is the policy of both authorities not to promote the AWPR as a "development corridor". Development at the AWPR junctions would limit the opportunities and accessibility improvements to sites off the AWPR itself. A strategy of AWPR villages has been assessed in the initial scoping of possible strategic options and dismissed from further consideration for these, and other, reasons.
AS.43.14	The major intersection at Blackdog, which will be created by the construction of the AWPR, represents a reasonable, sustainable and appropriate strategic location for development. Development here would enable the services and facilities of the present community to be enhanced and would ease the pressure for development in the eastern part of Aberdeenshire, to the north of the city.	This is taken as support for a "Western Peripheral Route Villages" strategy. There are considerable issues with such a strategy and it is not a strategy which has been taken forward either for technical evaluation or stakeholder engagement.

William Lippe Architects Ltd for Tulloch Castleglen Ltd

Mr W G Lippe

AS.41.1	Housing, economic potential and infrastructure are the driving forces behind a reasonably healthy and successful economy in the North East	Noted
AS.41.2	The language used in the first paragraph is so overblown that it will lead to derision (ridicule); "We will strive to achieve. . . for our communities" would be less inflated and suggests something that could be attained through appropriate effort.	Noted. The vision is an aspirational statement and is intended to provide a positive target that the future land-use development of the region can contribute towards.
AS.41.3	The assumption that a dramatic response to the issues is flawed. We need to be careful and considered in our approach, mindful of our stewardship of the land but acknowledging that development itself is not a bad thing	The view that a dramatic response may not be needed is noted. The comment suggests a re-wording of the vision to emphasise the practical requirements of seeking to achieve sustainable development.
AS.41.4	It is agreed that the vision should include everyone and that different communities should be able to have their varying needs considered fairly. This should include enabling people to live across Aberdeen and Aberdeenshire.	Noted.

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AS.41.5	Balancing peoples preference of location with the need to maintain vibrancy and services and facilities is difficult. The structure plan requires to provide flexibility through rolling review	Agreed. An annual action programme review is proposed, along with a 5 year formal review of the plan itself.
AS.41.6	The social, political and economic reality for Aberdeenshire has to take into account the structural hierarchy of settlements, and planning policy genuinely reflect this in a manner which is implementable.	Noted.
AS.41.7	Existing Green Belt policy has had over stringent application of its negative connotations. This is leading to an area of minor rural dereliction.	The function of the greenbelt requires to be reviewed, and we would agree that current policy is too strict in its application of a blanket ban on conversions for "strategic" reasons.
AS.41.8	The greater part of Aberdeenshire should not be denied the opportunity to see the development of the sort of housing that many people want in an environment more congenial than commonly found in urban areas. Small towns can be sustainable too.	The preferred spatial strategy which will arise after a series of consultations and reviews by infrastructure and service providers will determine where most development will be located throughout the region within a strategic allocation. A smaller allocation may also be made to reflect local needs.
AS.41.9	It is evident that insufficient employment land has been made overall, or not distributed properly. The new plan must ensure sufficient land from the beginning or allow a process for continual review.	Noted. The amount of employment land required to meet future needs and regional aspirations for growth will be discussed as part of the technical assessment of the possible strategies for the plan. A regular review of the final plan, after it has been adopted, is envisaged.
AS.41.10	Clean, reliable, comfortable, convenient and reasonably priced public transport is key to achieving an appropriate degree of sustainability for communities in a rural area. Park and ride also has a role to play, both for short distance and from strategic nodes.	The structure plan has no direct influence over the provision of public transport services. The spatial strategy can contribute to the business case for the provision of Park and Ride etc.
AS.41.11	Uncertainty caused by Scottish Water has been a serious impediment to the development industry and this needs to be resolved to return strategic planning to local authority control.	Noted. The Quality and Standards III investment programme (2006-2014) prepared by Scottish Water provides us with a medium term view with regard to water and sewerage needs. Discussions are ongoing with Scottish Water to ensure that Q&SIV can support the strategic land use plan.
AS.41.12	Land at Crichton, Inverurie, should be promoted as a significant strategic location	This proposal supports a number of possible strategic options including those centred on the existing transport corridor and the key settlements of Aberdeenshire.

William Lippe Architects Ltd for W. Maitland & Sons

Mr W G Lippe

AS.40.1	People should be able to live throughout the entire area of the city and shire. It shouldn't be the necessary to direct the vast majority of development to Aberdeen and the three or four largest towns in Aberdeenshire.	The structure plan will identify the most appropriate locations for all types of new development through a preferred strategic option which will arise after a series of consultations. A strategy of dispersal has been considered and dismissed. This view supports allocations reserved to meet local and rural needs.
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AS.40.2	The structure plan could determine where development of any particular kind- and how much- should take place but it would be better if it could be made to be more responsive throughout its lifetime, by a rolling programme of regular reviews.	Noted. There is likely to be a statutory duty over the next few years for local authorities to replace the new strategic development plans within 5 years of the date of adoption which should ensure that the plan provides an up-to-date and relevant framework which will guide development and co-ordinate land use change. In addition, action programmes (updated at least every two years) will also facilitate responsiveness.
AS.40.3	The language used in the first paragraph is so overblown that it will lead to derision (ridicule); "We will strive to achieve. . . for our communities" would be less inflated and suggests something that could be attained through appropriate effort.	Noted. The vision is an aspirational statement and is intended to provide a positive target that the future land-use development of the region can contribute towards.
AS.40.4	The social, economic and political reality for Aberdeenshire itself must take account of the structural hierarchy of large town, small town/village and countryside and the planning policies should reflect this.	We agree that the structural hierarchy of settlements needs to be reflected in planning policy. It may be that the strategy of the plan seeks to create a new or different hierarchy as part of the vision for the area.
AS.40.5	The interpretation and implementation of NEST Policy 12: Housebuilding in the Countryside Beyond the Greenbelt make it difficult so difficult to comply with that it is almost completely worthless, providing little opportunity for a reasonably sustainable version of a house in the country or to the very small communities that could benefit by such additions.	Noted
AS.40.6	In some appeal cases reporters have recognised the limitations of the cohesive groups policy in NEST Policy 12 and have identified that a change to the structure plan would be the proper instrument to enable matters to be corrected.	Noted.
AS.40.7	We have great concern relating to the application of NEST Policy 27: Green Belt (and its ALP derivatives), where over- stringent application of its negative connotations has resulted in redundant agricultural buildings of attractive, traditional appearance being abandoned and prevented from being converted into residential use.	Noted. The need to review the green belt will be considered by the structure plan. However, the detailed review of boundaries will be carried out by local plans. The work to identify those land uses that may be permitted within the green belt has yet to be undertaken.
AS.40.8	It is vital that full and proper account is taken of the 'needs and hopes' of the population, both in terms of the number and types of homes that can be built but in their location also.	Housing needs is an issue for the Local Housing Strategy and the structure plan will draw on the information from that document. A series of consultations are being carried out with communities and stakeholders to establish the preferred scale of development that should take place over the plan period.
AS.40.9	Misapplication of the principles of sustainability has already led to an over-concentration of development in Aberdeen city and the large towns of the north-east. Small towns can also be sustainable, up to limits set by various development thresholds such as schools, shops and other local services. It would be a mistake if the greater part of Aberdeenshire was to be denied the opportunity to see the development of the sort of housing that many people want.	Noted. This is taken to be support for a strategy that promotes development across Aberdeenshire to meet local needs and desires.
AS.40.10	The new structure plan must either ensure that sufficient employment land is allocated from the beginning or that an effective process for continual review of the plan throughout its lifetime is put in place.	Noted. The amount of employment land required to meet future needs and regional aspirations for growth will be discussed as part of the technical assessment of the possible strategies for the plan. A regular review of the final plan, after it has been adopted, is envisaged.

AS.40.11	Much more consideration must be given to medium distance provision of park and ride facilities (like Ellon to Aberdeen) from a range of strategically placed transport nodes selected throughout the rural commuter belt of the city.	The Regional and Local Transport Strategies set the transport policies for the region and it is in these documents that specific measures to address the region's transport problems are found. The provision of park and ride facilities can help to reduce levels of commuter traffic and this could be an important consideration in deciding which strategy for the future development of the region should be adopted by the structure plan.
AS.40.12	In recent years, the uncertainties created by Scottish Water and their unwillingness or inability to regard a commitment as binding, has been a serious impediment to most parts of the development industry. It is essential that it is resolved and that the primacy of real strategic planning is returned to local authority hands.	Noted. Scottish Water are a statutory consultee on the development plan and every effort will be made to obtain their input and commitment to the spatial strategy.

Ythan Community Council

Mr Charles Coulson

AS.77.1	All building land in the area has been used up but demand continues. Limitations imposed by the boundaries in the local plan have underestimated demand	Noted. The current plan may have underestimated the land requirements across Aberdeenshire and difficulties associated with release of land in Aberdeen City may have put additional pressure on rural communities. This comment supports the notion of allowing some development in these areas and could be taken as support for development in a new transport corridor to the north of Aberdeen City.
AS.77.2	Infill development can lead to small house plots and a diminution of the quality of the existing stock	Design standards and housing layout are issues to be addressed at the local plan level. The councils take into consideration guidance set out in SPP3 which states that infill development should respect the scale, form and density of its surroundings and enhances rather than detract from the character and amenity of existing residential areas, when assessing infill development proposals.
AS.77.3	Future settlement boundaries should identify public open space to provide "breathing space"	Noted. The structure plan is likely to include only high level policy statements on design. Detailed design matters would be more appropriately addressed in local plans.
AS.77.4	Settlements should be allowed to grow organically, without hard and fast boundaries	The issue of settlement boundaries is one for local plans rather than the structure plan.
AS.77.5	Development in rural areas should be allowed as quality of life outweighs issues associated with lack of infrastructure	Noted. Lack of control of development in rural areas could lead to the undermining of any spatial strategy through incremental and sporadic rural housing development.
AS.77.6	The boundaries of the settlements of Ythanbank, Tippetty and Berefold require to be expanded.	This is taken as support for a strategy that supports a new transport corridor to Ellon.