

## ANNEX B : COMMENTS ON OBJECTIONS NOT ACCEPTED BY THE SCOTTISH MINISTERS

### Chapter 1 : Strategy

Name	Objections	Reasons
Mr Stark	Objects to “flaws” in the Plan where the lead set by vision, aims and strategy is not properly followed. Fails to take a consistent approach to its treatment of strategic topics and in identifying the strategic distribution of development between edge of city communities.	Comments are mainly philosophic and semantic. Plan gives more emphasis to locational strategy than draft e.g. Table 1. Capacity of settlements for development been done through RoS (p 39) and Sustainability audit.
Barrett Construction Co, Chap Const and Morrison Homes	Object to omission of edge of centre settlements from T1.	The RoS gives a settlement by settlement view on potential development and Table 1 concentrates on those settlements where development is to be guided.
British Telecommunications plc	Seek an “established utilities” policy to ensure more flexibility for future investment	Not necessary as strategy chapter points out that choice of any location will be made on its value to the community and that there will be strong emphasis on regenerating existing sites within the urban fabric.
Miss Neish	Request for drafting amendment to objective 4 (p 10) to promote co-location where services exist.	Point is made elsewhere in the Plan e.g. Table 1 and most of strategy chapter.
Mr Benton	Objects to omission of Tarves at Table 1. Plan contradicts its own core objectives through its housing allocations which play down the role of small settlements. Rural shops, community facilities and transport in rural areas will all suffer. Requests additional allocation in AHMA to rectify anomalies of LP.	Councils have appraised all settlements for their capacity to take development as described in the RoS. Policies 8 and 9 also include an ‘other settlements’ category to allow small scale housing development up to 2010. These will identified in forthcoming LP which will have to conform with approved SP.
Mr Jessiman	Request references to emphasise road/sea/rail connections and freight transport priority corridors.	This chapter is setting general context and suggested amendments would put too much emphasis on one aspect.
Mr Dingwall, Scotoil Group plc	Request for a reference to the precautionary principle at Aim 8.	The Plan has benefited from a sustainability audit and the precautionary principle is defined in the Glossary
Aberdeen & Grampian Chamber of Commerce	Request that the SP refers to the potential benefits of expanding the city centre to incorporate recent developments	Review of the city centre boundary will be addressed and implemented through the forthcoming Local Plan. Major retail proposals are listed in the RoS and the Addendum which explain that they are reviewed every six months.

## Chapter 2 : Working in the North East

Name	Objections	Reasons
Mr Stark	Objects to Pol 2 as it fails to guide the strategic distribution of employment land within Aberdeen city esp. the edge of city communities.	The RoS explains that some edge of centre communities have seen significant amounts of development which has outstripped their ability to cope with additional growth. Similarly with employment land which is influenced by the demand for land in Aberdeen.
British Wind Energy Assoc.	Consider that support should be given to support wind energy development in particular.	Policy 5 explains that wind energy proposals will be based on sequential exploration of tiered planning designation and text is supportive.
Robertson Group Ltd	A minimum of 10 years supply of employment land is required and allocation for the city should be increased and SP should identify a single user site.	The RoS explains that the economy is not expected to grow significantly and allocations have been made accordingly. There is a 7 year supply of general industrial land which accords with NPPG2 and the area does not qualify for a high amenity single user site as it does not have development area status.
Mr Downie,	Objects to the industrial land requirements as presented to 2006 being based on the 1999 forecasts which are inadequate and incompetently founded.	GROS are overall content with the 1998 based figures. Admit there is a small difference in net migration assumptions as reported in the addendum to the RoS . Monitoring will determine whether these need to be modified in the light of actual migration trends.
Ms Davis, SEPA,	Request drafting amendment to strengthen point that economic devt takes place within constraints set by environmental and sustainability criteria. And to promote env. enhancement on brownfield sites.	Very detailed drafting points which do not affect the strategic objectives of the plan as they concentrate on development control aspects and are more relevant to local plan.
Mr Verkuil	Objects to the windfarm in the Netherley area, Stonehaven for a number of reasons.	Government policy is to encourage windfarm developments in suitable areas and Stonehaven area is thought to be suitable as an area of search, under the 4-tier policy of the Plan.
G & J Investments Ltd	Object to the identification of the Portlethen corridor which includes Badentoy and Mains of Cairnrobin with a marketable land requirement of 10-30ha.	The addendum to the RoS points out that some of this land is no longer marketable therefore other land has to be identified to maintain supply. The RoS also points that increasing the

## Chapter 2 : Working in the North East

Name	Objections	Reasons
G & J Investments Ltd (Contd)		allocation would create a distorted pattern of business and industrial allocations in the south of the city which are poorly related to other business, housing and markets.
Mr Hepburn	Requests interconnection between policies 1 & 9 to ensure that a proportion of new development is given over to commercial and retailing depending on the needs of the individual community.	The strategy chapter describes adequately how a better balance between housing, jobs, open space and services will be created.
Mr Partington	Request for the reinstatement of a single user site close to Aberdeen and replacement of Portlethen corridor by Loirston area for a business park.	As area is not a development area then it does not qualify for a high amenity, single user site as per NPPG2. The addendum to the RoS sets out the position regarding the supply of marketable industrial land. It is a matter for the Local Plan to identify a specific site for a business park.
Mr Armstrong	Objects to the use of out of date employment forecasts and that Plan is too negative in its approach and is not acting as a vehicle for growth.	Forecasts are based on the best available information and method and tie in with GROS forecasts. By identifying a 20% headroom flexibility the Plan is based on a growth scenario.
Aberdeen & Grampian Chamber of Commerce	Plan needs to be strengthened to facilitate communications infrastructure	Para 2.2.1 and Policy 4 (note reference given by AGCC is wrong) explains benefit and support for ICT..
Mr Geddes (APRS)	Objects that Policy 3 does not give sufficient weight to environmental considerations and that Policy 5 favours large windfarm proposals only.	Policy 3 is clear that proposals will only be approved if benefits to the community are shown to outweigh adverse environmental impact. The Plan recognises that windfarms can have adverse impacts, hence the need for the tiered area approach.
Scotia Homes Ltd	Request further employment land allocations in a number of settlements where housing is promoted	Within settlements mentioned there is a need to balance housing and employment based on capacity for development as the RoS explains.
Mr Bradford	The tourist strategy should avoid damaging the high quality environment.	Believe Policy 6 adequately safeguards against damaging the environment.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Mr Stark	Objects to policies 8, 9 which fails to guide housing development in edge of city communities and distribute development sensitively between small rural settlements. The status of Tables 4a & 4b is unclear. Policy 8 also permits local plans to release land and prejudice the workings of the housing market and allocations are too prescriptive and imply that a small variation of a dozen or so houses could be material to the Plan's purpose.	RoS explains that suburban areas of the city have all seen significant amounts of development which has outstripped the communities ability to cope with additional population. Pol 9 has a category 'other settlements' which LPs will identify for small scale economic and residential development. Provided LPs are kept up to date the phasing and release of housing land should progress timeously. Figures in policy 8 are indicative only.
Malcolm Allan Housebuilders Ltd	Objects to Housing policies 8, 9 and 10 as the settlement of Kemnay which is within the Aberdeen HMA is not identified for receipt of any housing in the period 2001-2016 which is surprising, given para 3.13. in that Kemnay is a service centre for the surrounding rural area.	The RoS explains that Kemnay has seen considerable growth in 70s and 80s and has limited local employment prospects and poor public transport connections.
Tor Ecosse Ltd, Mr Gillespie (SEG)	Concerned that SP's underlying assumptions are based on the 1999 forecasts when oil price was low. As local economy is now buoyant there is an under provision of housing despite the 20% headroom allowed for. Do not dispute overall conclusions of the forecasts however. Would like a 20% increase in the allocations anyway and for the amount of brownfield land to be fully investigated so as not repeat previous years underestimation. Also want to see every settlement to have a set percentage of affordable housing.	Councils are confident that there is enough flexibility in the housing forecasts to cater for growth scenario. By introducing a 20% headroom flexibility for the AHMA and 10% for the RHMA the robustness of the SP is secured. The 2000-based forecasts will not be published until August 2002 so will be more relevant for the SP's first review. On affordable housing, Pol 14 states that there is a need to consider location, marketing conditions and suitability of sites and area housing needs therefore cannot simply allocate a pro-rata amount to each settlement
Mr Tough	Objects to Pol 8 and the small allocation of "20 units" for "other settlements" in the Garioch area as this does not encourage individual self build projects because this land is snapped up by developers.	It is for LPs to identify specific sites in these settlements and the DC process will then consider each site on its merits.
Queen's Road Property Development	Suggest some rewording of Policy 8 to give more credence to respective roles of structure and local plans. Considers that	Rerwording only relates to phasing of land which may not be necessary in every case. Aberdeen LP is a year from adoption.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Queen's Road Property Development (Contd)	land supply should be augmented as the Aberdeen LP is still some way from being adopted as there will be an immediate shortfall until it is. Obj to Pol 9 on the same basis. Suggest that wording on review of allocations in SP is deleted as it creates planning blight and is unnecessary.	but these allocations can be released through CALPs which is an interim strategy until LP is finally adopted and through the DC process, once SP is approved. Believe statement regarding review of allocations is relevant given the changes in demand for housing, economy which could happen
Mr Murray and Mr Reid	Concern at the use of the 1999 forecasts and their implications for housing requirements in Table 2 which they feel to be an underestimation. Ask that the Scottish Ministers review the forecasts and introduce an appropriate flexibility factor to the requirement and to allocate housing in 5 other settlements in B&B not mentioned in Pols 8 and 9. Believe that an allocation of 50 houses between these 20 settlements will not provide sufficient choice in the HMA as required by NPPG3. Request deletion of wording in Pol 8 re the sequential of release of land through LPs as this will constrain effective land supply. Consider that Pol 13 should be reworded in line with Circ 12/96 to ensure request for contributions is reasonable. Pol should also not require developers to carry out assessments of the impact of their proposals on the community. Suggest rewording. Obj to wording in para 3.26 which states that 'the appropriate level of affordable housing is likely to be 35% across the area' on the grounds that it contradicts NPPG 3. Suggest that LPs should specify the level of AH required in each settlement and that this be reviewed on an annual basis.	Although figures for households differ slightly from Housing Stats MYE, the 2000-based population and household forecasts will not be published until Aug 2002 so will be more relevant for the SP's first review. It will be for the LP to identify specific locations and settlements. Overall totals in other settlements with flexibility are fairly generous and increase to 100 in later phase. Annual HLA and monitoring should ensure that 5 year supply is maintained. Par 3.23 states that 'developers can only make contributions that relate to the size and nature of their development' which is in line with the Circ. On impact Pol states quite reasonably that this exercise would be carried out jointly and take account of the views of the community. Rewording not accepted as it does not clarify responsibilities of parties. NPPG 3 is being reviewed. Policy 14 states that LPs will outline the level of provision which is in line with guidance and previous text explains that a housing needs surveys, just carried out will inform LPs.
Robert Gordon University	Objects to Pol 15 and para 3.30 which states that SP favours new retail facilities being provided within existing town centres and in accessible locations. Feel the SP should identify a requirement, based on a recent HF study, for additional convenience floorspace in the Aberdeen west area and to indicate that Pol 15 will not apply iro proposals seeking to meet that need.	Pol 15 reiterates the sequential test and is in line with NPPG8. A full position statement iro major retail development is published by the city council every 6 months which allows for constant monitoring of needs and informs LPs. It is for LP to identify specific locations as policy states.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Portlethen & District Community Council	Objects to Pols 8 and 9 which allocate land for 800 new houses in Portlethen over the next 10 years and 400 by Dec 2005. Community already needs facilities to catch up with the rapid expansion already experienced. Request no further devt of P until community facilities are put in place esp. schools, sports and leisure, roads and public transport. Concerned about coalescence with Newtonhill or Cove and impact on the landscape setting.	The RoS sets out the case for further development in Portlethen. Major employment opportunities make it a good location for modest growth although care will be needed to avoid exceeding the area's environmental capacity.
The Church of Scotland General Trustees	Consider that insufficient land has been allocated within Stonehaven and that the housing land requirements have been underestimated as based on 1999 forecasts. Too much emphasis is given to brownfield land meeting the requirement which is not supported by independent studies and there is not enough choice iro housing type and location of sites.	The RoS explains that severe land constraints in S will make it difficult to open up new areas to development once current land supply is exhausted. Forecasts use most up to date information available and include 20% headroom flexibility. Emphasis on brownfield is in line with NPPG 3. Policy 21 on design should ensure varied, interesting and quality house types.
Grampian Primary NHS Trust	Objects to 1999 forecasts which are out of date and cause underestimation of housing land requirements. Request that SP be modified to reflect updated forecasts. Plan should also have regard to the strategic opportunities presented by the recent pp for 350 houses at Kingseat so as to maximise the use of infrastructure.	No new forecasts available in the short term. Kingseat is referred to in RoS as a location where road access is difficult and where there are no public transport, school or other facilities.
Barratt Construction Ltd, Chap Construction Ltd, Craigallan Ltd, Morrison Homes Ltd and Kirkwood Homes Ltd	Object to the omission of edge of centre settlements from T1 esp. those which do fall within rural service centres. Request an EIP to discuss the housing land requirement which they say is underestimated. Obj to LPs being the vehicle which will enable a sequential release of devt land. Too much reliance on brownfield sites within Aberdeen which will not provide the range of house types required. Suggest rewording of Pol 13 on	The RoS gives a settlement by settlement view on potential development. T1 concentrates quite rightly on those settlements where devt is to be guided. No need for EIP as adequate information has been supplied. HLR based on most up to date forecast info available and has 20% headroom flexibility. LPs, provided they are up to date, are proper vehicle for phasing land release in specific locations. NPPG3 promotes

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Barratt Construction Ltd, Chap Construction Ltd, Craigallan Ltd, Morrison Homes Ltd and Kirkwood Homes Ltd (Contd)	developer contribution on the basis that it does not conform to Circ 12/96. Seek clarification of Pol 14 that LPs should be required to specify the level of affordable housing required in each settlement in line with NPPG3 and provide guidance to developers on the criteria to be considered. Request that a green belt and strategic land review be undertaken within a certain time frame. Question Pol 33 as it duplicates Pol 13.	the use of brownfield land and supports the anticipated levels in Aberdeen. Should not affect the range of house types which will be controlled through DC and urban design policies. As with Obj 16 rewording to Pol 13 not accepted as it does not clarify responsibilities of various parties. Pol 13 is only stating the principle and makes clear that contributions will be related in scale and kind to the development. Pol 14 states that LPs will outline the general level of provision of AH based on survey of need plus other info – will not be relevant to every settlement. It will be for LPs to determine how the 35% target figure will be determined locally. No need for review given the SP exercise carried out. Pol 33 is specifically tailored to the need to acquire developer contributions for transport improvements whereas Pol 13 is stating the principle more generally.
Mr Suttie	Pol 10 should refer to the release of land mid to longer term linked to the WPR. Pols 8 and 9 are too inflexible given time it will take to adopt the City LP and the level of greenfield land release is unrealistically low. Suggest some rewording to Pol 9 to omit need for SP review as feel it is not relevant to this document. Suggest a drafting mod to Pol 8 to clarify roles of SP and LP and consider there is a need to augment the land supply now as LPs are not yet up to pace to release land.	The Council's commitment to the WPR route is safeguarded and wording of Pol 32, which give its uncertainty, seems appropriate. The WPR's uncertainty also means that its links to strategic reserve land release are uncertain at this time and impossible to determine. Land can be released in line with SP once it is approved through the DC process as it is in line with CALPs also and doesn't need adoption of LP. Land supply is assumed to be accurately calculated and will be reviewed as described in Pol 9.
Robertson Group (Scotland) Ltd	Objects at Ch2 to effect that a minimum of 10 years supply of Employment Land is required and that the allocation of EL for city should be increased by 65-125 ha and that the SP should identify a requirement for a general industrial site of 10-30 ha for a single user.	On Employment Land, the RoS explains that the economy is not expected to grow significantly and allocations have been made accordingly. There is a seven year supply of general industrial land identified which accords with NPPG2. The area does not qualify for a high amenity single user as it does not have development area status.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Bett Homes Ltd	Object to overall housing requirement as expressed in Pol 8,9 and 10. Consider that Potterton adjacent the A90 should receive an allocation of 400 units to be released in 3 phases. Ellon too should receive an increased allowance to provide choice as is a main service centre. Should also be further greenfield releases in Aberdeen city to ensure choice. Should this not be acceptable, then 1500 houses in Pol 8 identified for brownfield devt should be added to the 400 greenfield making a total greenfield allowance of 1,900. Brownfield devt should be unlimited and additional to these allocations. Should be a greenfield release also in Oldmachar/Br of Don of 70 units in short term. The Banchory allocation should be increased from 50 to 200 and a greenfield release of 200 in City South to integrate with industrial land release at Altens and Peterseat thus reducing travel to work distances.	Requirement has been soundly calculated and includes headroom flexibility to cater for fluctuations in demand. All settlements have been considered for their ability to take growth as explained in the RoS pages 39-47. Potterton is actually in the green belt! Land has been allocated in the Portlethen corridor (400) related to business park release.
Frances McKay	Objects to the housing allocations proposed for the Banff/Macduff area on the grounds of over provision and as houses not selling in this area due to oversupply and population is not growing. There is already excess provision in CALPs.	SP allocates extra 200 units only in second 5 year period in this area. RoS explains that the established land supply in Banff and Macduff will need to be augmented for the social and economic benefit of the communities.
Hugh & Kathleen Roche, Miss Crompton, Mr & Mrs Dunbar and Mr & Mrs Rowe	Object to allocation for Muchalls of 25 houses in SP as a result of Reporter's recommendation to allow 25 units through the CALPs process which has no regard to the CA status of the village and will lead to its overdevelopment. Feel this decision pre-empts the SP approval process. This housing allocation does not meet strategic objectives of Plan.	Limited allocation only for Stonehaven, not Muchalls specifically and 'other settlements' to be identified through LPs. Future housing development in Muchalls is a LP issue. CALPs adoption should conform to this SP approval.
British Telecommunications plc	Seek amendment to Pol 11 to highlight the contribution that brownfield windfall sites can make to m.	Para 3.10 states clearly that the housing req. for the period up to 2010 will be met from, inter alia, windfall opportunities in brownfield locations and within settlements. Pol1 promotes re-use of brownfield sites for industrial and business use and will only be de-zoned where they stand little chance of devt after critical examination in line with NPPG2.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Mr Taylor	Objects to Pol 11 and following text as policy is contrary to established pattern of devt.	SP maintains strict restriction of development in the countryside although proposed draft modification to policy 12 will support established pattern of development.
Robert Drysdale Planning CWS Ltd, Carter Commercial Developments Ltd Scotoil Group plc	Object to lack of specific retailing provision in Westhill. The identification of retailing opportunities must not be limited to key settlements but to other towns and centres. Request that wording be added to Policy 15 to request that a RIA for development over 2500 sq. m as required by NPPG to provide comfort to developers seeking opportunities and public seeking information. Pol 15 should list the preferred locations for new retail devts e.g. retail park at Links Rd.	RoS explains that Westhill has been chosen for moderate growth because of its level of facilities in retailing. Pol 15 leaves it to LPs to identify appropriate development opportunities in smaller centres subject to the sequential test and accessibility considerations in line with NPPG 8. The need for RIA is a matter for LPs to set out along with relevant development control criteria. The RoS and Addendum list major retail proposals and refers to position statement produced every six months. Site specific locations are a LP matter.
Tesco Stores Ltd Safeway Stores plc	Request that the SP confirms that there are suburban centres in Aberdeen which have the function of a town centre, incl. Danestone, Dyce and Lang Stracht in west Aberdeen to assist in the implementation of Pol 15. Suggest an amendment to Pol 15 and to the definition of town centre in the Glossary to this effect.	T24 of RoS states that retail proposals have already been approved in the suburban centres of Danestone, Lang Stracht and Br of Dee without having to define the term in the SP. In addition there are issues relating to accessibility which have to be considered locally.
Mr Ward	Would appreciate a breakdown of what constitutes “other settlements”, presumably as the term is used in Housing Policies 8 & 9.	The term settlement is defined in the Glossary. In terms of which are suitable for development, Policy footnote explains that LPs will identify those in need of support from economic development or local services perspective.
Norman Lawie Ltd	Objects to affordable housing being determined by area housing needs and requests that they are determined on a settlement by settlement basis and for this to be reflected in Policy 14.	Pol 14 states that LPs will outline the general level of provision of affordable housing based on survey of need plus other information. This will not be relevant to every settlement.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Mr Latif	Request that the need for a Muslim community centre in the Br of Don area be specifically referred to in the SP, possibly para 3.23 in the same way that the Plan identifies the general locations of two business parks.	The Plan says very little about the future need for community facilities or school provision. Obviously do not see these as strategic issues but to be covered instead in forthcoming LPs. As this particular facility is likely to be covered in the forthcoming Aberdeen City LP (there is an existing proposal) it is unnecessary to highlight one particular type of community facility in the SP by amending the text as requested.
Mr Downie	Objects to the housing and industrial land requirements as presented to 2006 being based on the 1999 forecasts as they are inadequate and incompetently founded. Submits a paper in support of objection.	Scottish Executive had a concern, based on GROS comment at Consultative Draft stage, about the Aberdeenshire population projection where GROS forecast +3.6% for net migration compared with NEST forecast of -0.1%. However, GROS were overall content with their 1998 based figures and no change has been made. Instead the Councils in their Addendum RoS acknowledge this difference as due to differences in assumptions about future levels of net migration. Monitoring will determine whether the Plan requires modification in the light of the actual migration trends and new 2000-based population and household forecasts published in August 2002. GROS made no additional comment this time.
Mr Liddell	Asks for clarification as to whether grass playing fields would be appropriate in the green belt and a fuller description of permissible uses in Pol 28. Would this extend to ancillary development also? There is no explicit reference to planning for water sports as per NPPG 11. In applying a presumption against the devt of new ski areas at Pol 18, NEST is running contrary to NPPG 12. There should also be guidance on meeting the unmet demand for golf in this area.	Pol 27 actually states wrt to green belt review that future recreational needs should be accommodated and a strategic network of recreation areas identified. And para 4.35 that LPs should identify land that can accommodate the increasing demand for appropriate sports facilities. Pol 16 sets out a commitment to encourage the provision of new sports and recreational facilities and set criteria to guide their location. Pol 17 also gives protection to coast and inland water routes and networks. NPPG 12 actually emphasises consolidating existing centres rather than promoting new developments as mentioned in the RoS. Meeting the demand for golf will be met by Pol 16 and it will be for LPs to set out appropriate policies to guide their location.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Ms Davis (SEPA)	At intro to 'Living in NE' more needs to be said about link between devt pattern and drainage capacity and capital inv. programme for infrastructure. Request draft amendments to paras 3.3 to ensure that env considerations form part of the locational framework of LPs. To Pol 12 to identify env impact as a quality issue. To Pol 13 to make clear that developer contributions will also be sought for env enhancements. To Pals 15 & 16 to ensure consistency with Plan's other env policies. Would like reference to adoption of the "precautionary approach" at intro to 'Looking After NE' and at Pol 19.	None of these very detailed comments and drafting suggestions affect the strategic objectives of the plan but concentrate on development control aspects which are better suited to their response on the LPs which will follow. SEPA need to reconsider their intentions wrt to responding to SPs and appreciate the strategic nature of the Plan.
RB Farquhar (Homes) Ltd, Stewart Milne Homes Ltd, Grampian Housebuilders Committee, Mackies, Countesswells Consortium, Messrs G & I Collie Kennedy Consultants, Holyrood Developments, Wimpey Homes East Scotland Ltd, A & E Sorrie Farmers Ltd, Countryside Estates, Palisade properties plc, Alba Homes Ltd Mr Marshall	Object to overall housing requirement as expressed at Policies 7, 8, 9 and 10 as based on low forecasts. Request that settlements such as Inverurie, Kemnay, Kingswells, Milltimber, Cults, Blackburn, Newburgh, Br of Don and Cove should all receive additional allocations.	No new population and household forecasts are available in the short term. GHCC do however provide alternative forecasts on employment, GDP as produced by Cambridge Econometrics for the former Scottish regions based on analysis of local economies. Therefore area for forecasts does not coincide with SP area. Forecasts are still subject to questionable assumptions and are open scrutiny. The RoS, which gives a settlement by settlement view on potential development, states that Lower Deeside has already provided a great deal of devt for housing, especially flatted development, that Bridge of Don, Cove, Kingswells and Kemnay have already seen a significant amount of development. Kingseat is referred to in RoS as a location where road access is difficult and where there are no public transport, school or other facilities. SP identifies Inverurie for moderate growth over the plan period. Blackburn has been identified in T1 as a settlement that can accommodate growth and Addendum to RoS states that it has an allocation of 300 for the period 2000-05. Newburgh was not identified in the RoS as having sufficient capacity for development although may be covered by 'other settlements' category to be identified through LPs.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Miss Neish	Objects to two tiers of housing market which will disadvantage the rural areas.	The two HMAs are used as vehicle in the allocation of housing land supply and conform national guidance and advice. Their delineation has no effect on house prices.
Mr Bradford	Pol 14 cannot be achieved without change in support for new affordable rented housing from Govmt/HAs and include the private rented sector as providers.	Believe Pol 14 already recognises that other agencies will be involved in meeting identified AH needs.
J D Paton's Trust	Object to Housing Pols 7,8,9 and 10 as do not accept that sufficient brownfield opportunities exist to meet the housing allocations. Would like stated that, "in the event of a shortfall, additional greenfield releases will be made within the Aberdeen city area".	Brownfield opportunities will be developed through LPs as the policies indicate. Councils are confident that these levels of brownfield development which are in line with Government objective, can be found and agreed through annual Housing Land audit. No need for drafting amendment as suggested.
Robert Gordon College	Object that the Plan does not provide for a strategy ito housing for the whole Plan period up to 2016 as indicative figures only are given for the final 5 year period.. Obj to the HLR and the promotion of a blanket restraint around Aberdeen which is at odds with the demographic changes in the area. Even with the headroom flexibility proposed the forecast is pessimistic. The 1999 strategic forecasts are flawed and cannot be relied upon for the calculation of the HLR. An EIP would ensure that the validity of the forecast and the HLR be fully debated. Too much reliance on brownfield and not enough greenfield provision. Obj to Pol 14 as it passes the task of affordable housing to the LP to address. .Plan must identify that AH is targeted to areas where there is a need rather than the LP setting a quota or target on developers. Policy does not relate to settlements or small local areas but to a whole HMA. Suggest some modified wording to Pol 14. Obj to Pol 13 which is not sufficiently clear to provide investors and developers with LA requirements.	Policy 9 reflects the SP strategy of creating a long term sustainable framework of settlements and explains that allocations for the long term will have to be subject to review probably in five years time. On issue of forecasts, no alternative provided by the objector and doubt whether an EIP would provide a better basis for forecasts. Government policy is to promote brownfield devt. As with Objs 16 and 25, Pol 14 states that LPs will outline the general level of provision of Affordable housing requirements based on survey of need plus other information and will not be relevant to every settlement. Policy 14 also states that LPs will outline the level of provision which is in line with guidance and previous text explains that a housing needs surveys, just carried out will inform LPs. Suggested wording not accepted as it is unrealistic to do a housing needs assessment for each community. As the impact of proposals will be site specific cannot be too prescriptive about what developer contributions should include. Short term housing needs in Pol 8 have been largely inherited from existing commitments (para 3.14).

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Mr Hepburn	Agrees with the concept of developer contributions but should be identified for a specific devt through the LP process and applied across devt esp. in Inverurie. Present LP policies do not seek developer contributions from small developments or individual houses and this is unreasonable as have an impact ito cost of provision of services. Believes the provision of low cost affordable housing is not being dealt with on the basis of need but on ability to pay (from people who put their name on waiting list in order to get a chance to buy an AH. AH also causes a deflation in local property markets and people should not be allowed to purchase such homes. It should therefore be restricted to the social rented and special needs sector.	Developer contribution policy 13 sets out that LPs will identify criteria and circumstances where contribution will be required and be related in scale and kind to the devt. Para 3.27 sets out transparently the kind of people that AH policy will help e.g. special needs, physically disabled and the elderly. The deflationary aspect of AH is not a SP or planning issue.
Mr Partington	suggests that the most sustainable approach to accommodating the 800 greenfield allocation for the city 2006-10 is within an urban village at Loirston.	It is a matter for LPs to identify the specific sites for greenfield housing.
Mr & Mrs Tawse	Request increased housing allocations for Ellon in medium to long term and for SP to recognise it as key growth settlement. Obj specifically to reference at para 3.15 which describes “constraint” and because Ellon has “already been committed to accepting considerable growth”.	The RoS explains that Ellon has grown rapidly from a small market town in the 1970s and has since maintained steady growth. The SP believes the established land supply should prove adequate for the foreseeable future. This position will be reviewed within 5 years. The Addendum to RoS also states that it has large constrained land supply at Jan 2000.
Mr Armstrong	Over emphasis on bringing forward urban brownfield sites for hsg devt which unbalances the mix of dwellings i.e. too many flats. Planning gain should be tied tightly in a locational sense to the proposed devt. Would like to see a flexible approach to application of sequential test for retailing	Govt policy is to promote devt on brownfield land and this should not alter balance of house types available. Dev contribution policy is setting out the principle of devt and each agreement will have to be suited to the development through the LP and DC process. Retailing approach accords fully with NPPG8. Note support for Plan.

### Chapter 3 : Living in the North East (Contd)

Name	Objections	Reasons
Scotia Homes Ltd	Suggest drafting amendments to Policies 8,9 and 10 to deliver actual housing completions rather than allocations. Request removal of developer contribution policies 13 & 14 as fail to comply with Government guidance and NPPG3.	Making appropriate land allocations follows Government advice and fail to see how it is possible to forecast house completions. Developer contribution policy sets out the principles involved and what is likely to be covered by them which is in line with Circular. Affordable housing policy conforms to NPPG3.
Dr Macdonald SNH	Concerned that allocations in settlements have not been made with reference to their capacity for expansion and issues like landscape setting, flooding, biodiversity transport pollution.	RoS explains that capacity of settlements was assessed in making land allocations and gives a summary. Also a sustainability audit of the whole Plan was undertaken.
Janet Clark	Comment at Par 3.34 and Pol 17 that welcome commitment to promoting better access to open space. But request a drafting amendment to include “rights of way” as distinct from “footpaths” in the light of the proposed new legislation.	As this legislation is still subject to consultation and Parliamentary scrutiny it is not clear that access along rights of way will be possible at all times. Also, new wording wouldn't affect meaning of text.

## Chapter 4 : Chapter 4 – Looking after the North East

Name	Objections	Reasons
Queens Head Property Development	Object to Pol 28 as it does not fully reflect the finalised Aberdeen City LP policy which allows large formal sports facilities such as tennis centres to be allowed. Suggest the word “appropriate” be replaced by the words “large formal” to reflect the Council’s policy.	Large formal sports development may not be appropriate in green belts given its scale and design. Draft LP policy states a need for a sports facility exists but that site should comply with other LP policies and only be allowed in GB if no urban or strategic reserve land sites are available and proposals do not lead to intrusive setting in GB. The particular site chosen for proposal was in fact 16 <sup>th</sup> out of 18 potential sites searched by the Council hence need for policy to be restrictive.
S E MacInnes	Endorse Pol 27 iro green belt but concerned that city council will sell off playing fields south of Craigton Rd for housing. Also concerned that GHT will sell off the Woodlands Hospital complex for housing/supermarket.	Approval of GB policy in SP and LP will help to safeguard these future areas against devt. Other comments are not relevant to SP but should be addressed to ACC.
Barratt Construction Ltd Chap Construction, Craigallan Ltd, Morrison Homes Ltd, Messrs G & I Collie Mr Armstrong	Request that a green belt and strategic land reserve review be undertaken within a specific timeframe. Review should ensure that housing shortfalls can be addressed and Pol 27 should be more proactive in initiating a full review.	Pol 27 commits both Councils to a review.
British Telecommunications plc, Scotia Homes Ltd	Seek an amendment to Pol 28 to allow development that is required for economic growth (i.e. telecomms) in the green belt. The SP should promote the continued development of strategic reserve land before review of GB is undertaken within LPs.	Pol 28 does not preclude telecomms development and NPPG 19 states that such development will be permissible subject to strict criteria on siting and design. SRL will be looked at for long term devt as the policy states, however where there is a short term need to review green belt boundaries – which is appropriate given reliance on brownfield devt in the short term to meet housing requirements, Pol 28 is clear re what will be permitted in the GB – employment is not necessarily the main consideration in these locations.

## Chapter 4 : Chapter 4 – Looking after the North East

Name	Objections	Reasons
David Liddell (SportsScotland)	Ask for clarification as to whether grass playing fields would be appropriate in the green belt and a fuller description of permissible uses in Pol 28.	Pol 27 actually states wrt green belt review that future recreational needs should be accommodated and a strategic network of recreation areas identified. Para 4.35 states that LPs should identify land that can accommodate the increasing demand for sports facilities.
Mr Gillespie (SEG), Scotoil Group	Have significant reservations re the SP's approach to waste management. The SP does not provide a means of uniting the implementation of the respective Councils' strategies and does not mention the recently WS for Aberdeenshire or draft for the city being developed by SEPA. The SP should seek to clarify the strategic cross boundary issues which will result from the adoption of two different approaches. Suggest some drafting comments for para 4.24 and to para 4.26 to widen the relevance of waste management infrastructure to the needs of industry/business generally. Support the SP's promotion of energy from waste plants but would like to see a specific policy on this. Support review of GB as required by Pol 27 but wants the impact of the WPR on the GB to be included as this will have major implications on land supply from 2006 and would like this mentioned at para 4.35.	On WM the issue of co-ordination and integration of waste policy is for the Area Waste Plan not the development plan. Energy from waste is only one aspect of renewable energy policy and is in its infancy. There is not enough certainty about the implementation of the WPR to assess the strategic development options that it may create.
Ms Davis (SEPA)	Would like reference to adoption of the "precautionary approach" at intro to 'Looking After NE' and at Pol 19. The national designations para should have a reference to the need for there to be no alternative locations and local designations should be reworded at end to be made more precise. Would like stated that planning decisions will be guided by LBAPs. Support policy on design. Other amendments suggested to Pol 22 on water management, the Water Framework directive, devt in flood risk areas, the precautionary principle in context of	Whilst comments are well made they are much too detailed in nature for a structure plan. None of them affect the strategic objectives of the plan but concentrate on development control aspects which are better suited to their response on the LPs which will follow

## Chapter 4 : Chapter 4 – Looking after the North East

Name	Objections	Reasons
Ms Davis (SEPA) (Contd)	planning and flooding, minerals, waste management, and the 4-tier policy areas, green belt, coastal zone management, coastal planning and monitoring. Believe there are also omissions on contaminated land and drainage infrastructure.	
J D Paton’s Trust	Object to Pol 28 and the statement that “no development will be permitted in the green belt” as it does not reflect the way in which the policy has been implemented by the city council e.g. park and ride site at Kingswells and possible major leisure facility at E Middlefield. An element of flexibility should therefore be recognised in the wording of the policy.	Pol 27 explains that a GB and Strategic Reserve land review will aim to protect recreational assets and meet the aims of sustainable transport and identify land for long term needs. This includes adequate flexibility in the long term and this policy has to be read in conjunction with Pol 28. These opportunities will be developed through LPs as the policies state.
Robert Gordon College	Definition of green belt should allow for relocation of educational facilities to be accommodated.	Policy 27 sets out the aims of the green belt review which will indicate the final definition of boundaries. The future relocation of the college would be assessed in this exercise.
Mr Dingwall	Suggests a drafting amendment to Pol 20 to make LPs explicit in their commitment to protect historic gardens and designed landscapes.	Para 4.10 states that the built heritage includes historic gardens and policy 20 that the built heritage will be conserved and promoted through LPs.
Mr Roe	Comments that increasing the population of villages through modern kit housing development is not conducive to increasing tourism and an attractive countryside.	Pol 21 on design and prudent development control should ensure that the quality of the NE’s environment is not jeopardised through excessive development.
Mr Smart	Objects to Pol 26 and T5 as there is no restriction on the visual impact of the largest “industrial” wind turbines. Should be additional criteria at Tier 2 which prohibits devt on ridgelines and at Tier 3 which prohibits devt of wind turbines which would be visible against the sky from the surrounding area. Also as an objection to Pol 26, the buffer to settlement boundaries should be a minimum of 2000 and not 400m. If wind turbine developments are to be encouraged then they need to be encouraged further away from housing. Request that clear guidelines are needed for siting large wind turbines close to residential areas	Pol 26 and T5 sets out the search areas for windfarms and indicates the general types of area where they are likely to be approved. The exact location of them and their proximity to housing will be a matter for the LP and the development control process.

## Chapter 4 : Chapter 4 – Looking after the North East

Name	Objections	Reasons
Scottish Wildlife Trust	Welcome the proposed revision of the Regional Forestry strategy as an Alteration to the SP in due course and would like it conformed that the process will include a full consultation process including SWT. As forestry is not subject to planning control conflicts with objector’s understanding that forestry control is subject to consideration of any rights of way which might be affected.	As the review of forestry will follow Circ. 9/99 it is implicit that SWT will be consulted. Para 4.17 does explain that forestry proposals will be subject to negotiation, persuasion and objection and this issue would therefore be picked up without the need for planning control.
RPS Consultants	Comment at para 4.21 that landfill is a long term requirement and the SP should acknowledge the need to meet Landfill Directive targets which require lead in times of up to 5 years and beyond. Drafting amendments are suggested to paras 4.21 and 4.22. The tiered approach should be developed to be applicable to all waste management facilities such as transfer stations, recycling facilities not just landfill and land raise. Suggest drafting amendment to para 4.25 and 4.29-4.31 on this basis.	The RoS explains role of Directives and NPPG 10 in formulating SP policy on landfill which is an increasingly contentious issue and a new emphasis on waste reduction, re-use and recovery in line with NWS is required. Para 4.26 states preferred siting options for these other facilities, in an industrial setting. It will be up to LPs to identify specific sites
RSPB	Policy 19 lacks mention of a requirement encouraging enhancement of nature conservation in association with development proposals and does not mention mitigation.	Pol 19 does emphasise avoiding adverse impacts on biodiversity and appropriate measures to conserve and enhance ecology.
Kingswells area residents, Kingswells Infrastructure First Group, Cults, Bielside & Milltimber Community Council, Braeside & Mannofield Community Council	Object to principle of breaching the green belt for a football stadium;	NPPG 11(para 73) allows for the siting of a football stadium in the green belt but only under very special circumstances and only after all other practicable options for location had been exhausted, preferably in the context of the structure plan. It is felt in this case that the SFA’s bid for the Euro2008 championship provides the ‘very special circumstances’. The modification does not identify a particular site but specifies that it should meet the requirements of NPPG 11 (para 72) on normal planning considerations, such as traffic, parking, access to public transport and conflicts with neighbouring uses. It will be a matter for the local plan and development control process to identify a specific site for a stadium and to consider whether NPPG 11 are being met.

	Object to the introduction of a stadium through a draft modification which is inappropriate as it has not been the subject to public consultation;	It is unfortunate that the modification has had to be introduced at this stage of the approval process but this is because of the timescale imposed by the SFA bidding process. This process only began after the finalised plan had been produced. It was felt timeous to include a draft modification as it was felt that a new stadium was a strategic issue and its advertisement as a draft modification would provide an opportunity for consultation on the principle of a stadium in the Aberdeen area. The development control and local plan processes will allow further opportunities for consultation on specific sites.
	Comment on the failure of the draft modification to consider alternative sites;	It is not the purpose of the draft modification to a structure plan to consider alternative sites. This is a misinterpretation of the draft modification. The local plan which will follow approval of the structure plan is the proper vehicle for consideration of alternative sites.
	Comment on the failure of the draft modification to consider whether any site within the Aberdeen green belt can meet the requirements of NPPG 17;	It is not the purpose of the draft modification to consider whether “any” site within the Aberdeen green belt can meet the requirements of NPPG 17. This is a matter for the LP and DC process including the need to prepare a TIA and EIA in connection with a specific planning application.
	Comment that a more suitable site at Charleston is being overlooked;	The suggested “more suitable” site at Charleston is not an issue for the SP which is concerned only with the principle of a stadium in the Aberdeen area.
	Object to the lack of infrastructure to support such a major development	The lack of infrastructure for a particular proposal can only be assessed once a specific proposal is progressed and the infrastructure requirements for its operation assessed in detail i.e. following the preparation of a Transport Impact assessment and Environmental Impact assessment.

## Chapter 5 – Moving about the North East

Name	Objections	Reasons
Mr McEwen Dr Edwards Mr Davies Ms Harding Mrs Birnie	Object to para 5.4 and the charging regimes and maximum car parking standards to which it refers as they would damage the economy, particularly due to diversion of trade from the internet. Also the environmental justification for restricting car use is uncertain as modern cars produce limited pollution and the public is opposed to congestion charges. Object to the use of the word “include” rather than examine.	This para is merely setting out the contextual background for supporting policies which are aimed at reducing the need to travel by car which is a national aim. As these measures have already been assessed through the Local transport Strategy the word “include” is correct.
Mr Stark	Considers that the actions necessary to implement Pol 30 are unclear as it does not indicate which corridors or facilities are to be improved and the Plan fails to have regard to the resources likely to be available for carrying out its proposals.	Pol 30 is a general policy to encourage strategic rail, trunk road, port and airport infrastructure. Resources are largely unknown and is a policy of intent by the Council and will depend on measures such as congestion charging, rail franchising and SE funding all of which are unknown at this stage.
Mr Suttie Robertson Group Mr Gillespie (SEG) Alfred McAlpine Developments Ltd Countesswells Consortium Mr Hepburn Mr Armstrong	Support Pol 32 but suggest that the “WPR” is included in the policy to reflect its strategic importance and make it a priority for funding and for LPs to safeguard route. Concern at the onus put on LPs and LTS to deliver the WPR and request more on funding. Request that Pol 30 be reworded to include new housing provision along the route of the WPR on strategic reserve land to meet shortfalls. The implications of the WPR on employment land should be addressed by the Plan.	Given what is said in preceding text the Council’s commitment to the WPR route (which is shown in the Key Diagram) is already safeguarded by implication and by Pol 32 which given its uncertainty, seems appropriate. Doubts about how the WPR can be funded also means that its links to strategic reserve land release are uncertain at this time and impossible to determine. Developer contributions policy would obviously apply to this type of infrastructure provision. Cannot allocate employment land on the basis of a road which is not programmed.
Mr Bradford	iv) The SP should identify and safeguard appropriate rail routes for future development.	Pol 30 safeguards potential rail routes as per NPPG 17.
Mr Jessiman Aberdeen & Grampian Chamber of Commerce	v) Request drafting amendment to Pol 30 to support the transfer of freight from road to rail and sea in an integrated way and consider that Pol 32 should be reinforced to safeguard areas adjacent to major transport nodes for future growth so that a fully integrated freight network can be realised. Request that transport infrastructure improvements as identified are made during the Plan period and more emphasis on the efficient movement of goods and freight.	Para 5.9 promotes movement of freight by rail and sea wherever possible. Pol 32 is a general policy (not just about freight) which safeguards land for transport proposals “that contribute to the modern transport system” which could include railfreight terminals (para 5.14). transport objectives are sometimes aspirational and not programmed e.g. WPR, thus no guarantee can be given to their implementation. SP support for freight is given in Pol 31.

## Chapter 5 – Moving about the North East

Name	Objections	Reasons
Scottish Wildlife Trust Dr Macdonald (SNH)	Object to misleading entry in Table 39a of the Addendum to the RoS that the WPR would score “very positive for minimal environmental impact” as the route threatens many wildlife sites, habitats and species and fragments the green belt. Concerns regarding the environmental implications of the WPR.	Table 39a of Addendum to RoS is indicative only and a full Environmental assessment would be required with detailed planning application prior to implementation of WPR. EIAs relate to individual planning applications which have significant environmental impacts and are for development control purposes.

**Chapter 6 – Keeping the Plan up to date**

<b>Name</b>	<b>Objections</b>	<b>Reasons</b>
Stewart Milne Homes	Objects to the presentation of Green Belt in the Key Diagram which is misleading when compared to previous structure plan’s key diagram.	Key Diagram is diagrammatic only. Pol 27 explains that LPs will set the detailed boundaries of green belt which will be subject to review. Footnote also explains that the KD is not a comprehensive constraints map and Regulations/Planning Act also explains its status.
Aberdeen & Grampian Chamber of Commerce	Wish to see monitoring process and assessment of proposals (based on economic benefit against environmental and social impact) developed and agreed with stakeholders before Ministerial approval of SP.	Monitoring will be ongoing and be carried out through a validation process and consultation with all the partners as explained on page 61. Has already been comprehensive consultation with stakeholders’ interests prior to final submission

## General

Name	Objections	Reasons
Mr Williams	Lack of recognition on the need for access by emergency services to developments and infrastructure design.	This is essentially a Local Plan and development control issue. Design policy 21 implies that that these issues will be considered.
The Ferryhill Heritage Society	Concern regarding environmental, design and traffic issues in the Guild St and Justice Mill Lane/Strawberrybank developments.	The two cases mentioned have already been granted planning consent subject to conditions to safeguard environmental, design and traffic aspects of the development and are not an issue for this SP.
Mr Jessiman	Request change to RoS re the use of brownfield land for housing to introduce a presumption in favour of brownfield sites adjacent to major transport nodes being considered firstly for business rather than residential use and that brownfield devt for residential purposes does not conflict with established uses in the harbour operational area.	Specific uses for brownfield sites and within Guild St devt are a matter for LP and development control.
Mr Roe	Comment that none of the villages outlined in the Plan are able to cope with the present levels of vandalism and for them to be allocated more housing will make the problem worse.	not a structure plan issue but good design (Pol 21) in new development can ensure that vandalism is minimised.