

Source	Summary of Comments	Summary of Points	Analysis	Action
65.1 Mr P Allan, PPCA LTD, Cala Homes (Scotland) Ltd	<p>There is a dichotomy apparent in the policies and reasoning regarding site availability and location compared with the similar issues raised in Chapter 3 "Living in the North East".</p> <p>It is a basic function of Town Planning to provide for an appropriate distribution of jobs, houses and facilities designed to provide choice, to reduce the need to travel and for sites to be marketable/effective. Greenfield land is proposed for jobs for marketing reasons yet, largely, denied for housing. There is neither logic nor foundation for such a discrepancy.</p> <p>Many of the brownfield sites which have come forward for housing (and, by definition, which are envisaged via the site-finding exercise required of Local Plans) are on former industrial land. If there is any logic in the emphasis on brownfield land for housing, it must apply equally to jobs. If it did, however, there would never be the quantity of brownfield land available for housing assumed in the Plan.</p>	<p>1) It is considered that there is unfairness in the Plan's approach to the use of brownfield sites by different land uses. The emphasis in the Plan is to use brownfield land for housing but not for industry, yet many of the brownfield sites that come forward are on former industrial land. There is no logic or foundation in such an approach.</p> <p>2) The role of brownfield sites in assessing future industrial and business land requirements was raised and it is considered that this should take account of vacant plots/premises on existing industrial areas. It is also considered that there is a need to reserve some brownfield sites for small business units to provide start up opportunities for new businesses.</p> <p>3) New oil development should be directed to industrial estates and a policy is required for the restoration of derelict industrial sites, for when industry has moved away. There is also a need for a policy to cover the rejuvenation of existing industrial sites as is happening at East Tullos in Aberdeen.</p> <p>4) An intention is required in the Plan to identify potential brownfield sites in rural areas in and outwith small settlements in Formartine .</p>	<p>1) The Structure Plan Strategy seeks to emphasise the Plan's commitment to the regeneration of brownfield land. For larger sites the promotion of a mix of land uses is encouraged, including housing and business use. Implementation of this approach will be through local plans and development briefs. There are examples of brownfield sites being successfully re-cycled for industrial and business use (e.g. Links Road at Aberdeen Harbour), but the requirements for industry are generally for larger sites than become available from brownfield regeneration. In residential areas general industrial use would not be a good neighbour and in locations where a range of uses would be acceptable on a brownfield sites, business and industry often lose out to higher value uses. In situations where there is market failure, assistance may be available from organisations such as Scottish Enterprise Grampian and the Aberdeenshire Industrial Land Partnership on a priority basis.</p> <p>2) The role of vacant brownfield industrial land in the assessment of future industrial and business land requirements is explained on page 16 of the Structure Plan Report of Survey. It is agreed that there should be a policy mechanism for dealing with industrial sites which become derelict or stand little chance of development. It would be appropriate to provide a better cross-link between the Plan and the Report of Survey on the issue of supply and demand for employment land.</p>	<p>1) The text of the Working in the North East Chapter and Employment Policy 1 has been amended to emphasize the contribution brownfield sites can make to regeneration of the area's economy.</p> <p>2) Cross-reference has been provided between the Plan and the Report of Survey regarding the monitoring of future industrial and business land requirements. Employment Policy 1 has been amended to take account of sites that stand little chance of development.</p> <p>3) No change to the Plan. These matters are best dealt with at a local plan level.</p> <p>4) No change to the Plan. These matters are best dealt with at a local plan level.</p>
74.7 Mrs R A Henderson, Cove and Altens Community	<p>Given the inevitable downturn and reduction in the oil industry, the Plan should include a policy on the restoration of sites left derelict when industry has moved away/become defunct/relocated. Could this be funded by planning gain?</p>	<p>3) New oil development should be directed to industrial estates and a policy is required for the restoration of derelict industrial sites, for when industry has moved away. There is also a need for a policy to cover the rejuvenation of existing industrial sites as is happening at East Tullos in Aberdeen.</p>	<p>2) The role of vacant brownfield industrial land in the assessment of future industrial and business land requirements is explained on page 16 of the Structure Plan Report of Survey. It is agreed that there should be a policy mechanism for dealing with industrial sites which become derelict or stand little chance of development. It would be appropriate to provide a better cross-link between the Plan and the Report of Survey on the issue of supply and demand for employment land.</p>	<p>3) No change to the Plan. These matters are best dealt with at a local plan level.</p> <p>4) No change to the Plan. These matters are best dealt with at a local plan level.</p>
74.12 Mrs R A Henderson, Cove and Altens Community	<p>The Plan should include a statement to the effect that brownfield, undeveloped and empty industrial sites are accounted for in the industrial land calculations. Many people think they are overlooked.</p>	<p>3) New oil development should be directed to industrial estates and a policy is required for the restoration of derelict industrial sites, for when industry has moved away. There is also a need for a policy to cover the rejuvenation of existing industrial sites as is happening at East Tullos in Aberdeen.</p>	<p>2) The role of vacant brownfield industrial land in the assessment of future industrial and business land requirements is explained on page 16 of the Structure Plan Report of Survey. It is agreed that there should be a policy mechanism for dealing with industrial sites which become derelict or stand little chance of development. It would be appropriate to provide a better cross-link between the Plan and the Report of Survey on the issue of supply and demand for employment land.</p>	<p>3) No change to the Plan. These matters are best dealt with at a local plan level.</p> <p>4) No change to the Plan. These matters are best dealt with at a local plan level.</p>
123.28 Ms A Harvie, Aberdeen Chamber of Commerce	<p>A specific policy reference to orchestrating the rejuvenation of existing industrial sites in collaboration with the occupiers would be beneficial. It is understood that experience at East Tullos is that existing occupiers welcome this and would add development value.</p>	<p>4) An intention is required in the Plan to identify potential brownfield sites in rural areas in and outwith small settlements in Formartine .</p>	<p>2) The role of vacant brownfield industrial land in the assessment of future industrial and business land requirements is explained on page 16 of the Structure Plan Report of Survey. It is agreed that there should be a policy mechanism for dealing with industrial sites which become derelict or stand little chance of development. It would be appropriate to provide a better cross-link between the Plan and the Report of Survey on the issue of supply and demand for employment land.</p>	<p>3) No change to the Plan. These matters are best dealt with at a local plan level.</p> <p>4) No change to the Plan. These matters are best dealt with at a local plan level.</p>

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140.20 Mr K Newton, Formartine Partnership	There seems to be considerable emphasis on filling brown field sites with houses. Where town centres have no facility to accommodate new business developments, perhaps some provision should be made on the brown field sites, for new small business units. These could be built in a sympathetic fashion to suit the surroundings, and would offer small businesses a better start up opportunity, than the expensive commercial units on industrial estates, which are currently the only other alternative, if businesses are to stay "in" the town.		3) The majority of oil related development of an industrial nature in the North East is carried out within industrial estates or areas allocated for industrial purposes. Development planning policies will prevent inappropriate development. The Aberdeen City Local Plan includes a policy encouraging the environmental improvement of existing industrial and business areas and it is considered that this matter is best dealt with at a local plan level. The partnership approach adopted at East Tullos in the City is welcomed and may prove a useful model for generating improvements to other industrial areas.	
140.25 Mr K Newton, Formartine Partnership	This section should also include an intention to identify potential brownfield sites in rural areas in and outwith small settlements in Formartine.			
160.10 Ms V Munro Stevens	Oil related development should be limited to industrial estates to mitigate its affect on tourism.			
161.5 Mr A Finlayson, The Community Councils Forum of the City of Abn.	The assessment of available industrial land should include undeveloped/vacant plots within existing industrial sites.		4) The identification of potential brownfield sites in Formartine is best dealt with in the new Aberdeenshire Local Plan.	

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21.3 Mr CR Hunneyball, Kemnay Community Council	It seems illogical to identify and develop another site to the south of Aberdeen, which is already well served by Badentoy and Portlethen. The objector would prefer to see at site more centrally located within Aberdeenshire in order to reduce the need for commuting.	1) It is considered that the allocation for Aberdeen in Employment Land Policy Two should be increased from 30-75 to 50-125 hectares and that the Plan should identify locations across the City, in particular Bridge of Don where there is a shortage of land and known demand.	1) The marketable land requirements for settlements are based on nett developable areas and seek to ensure that within the recommended range there is a marketable supply of land available at any one time in these settlements. It is considered that there would be benefits in raising the lower end of the range for the City upwards from 30 to 40 hectares, this would help ensure that any upsurge in demand for land would be catered for. It is not believed that it is necessary to split Aberdeen into different areas, as allocations for the City will be determined by the Aberdeen City Local Plan.	1) Employment Policy 2 has been amended to increase the marketable land requirements for Aberdeen City from 30-75 hectares to 40-75 hectares.
39.1 Ms E Farquharson-Black, Paull & Williamsons, Solicitors, G & J Investments Limited	There is a marketable supply of c.10.1 hectares of land available at Badentoy, and not 12.1 hectares as stated on page 21 of the Report of Survey.	2) In Aberdeenshire it is suggested that allocations should be increased at Westhill, Ellon and Inverurie and new allocations made at Turriff, Alford, Old Meldrum, Huntly and Banchory. It is also suggested that an excessive amount of land has been allocated to Inverurie. It is queried as to why separate allocations have not been made at Badentoy and Moss-side/Cairnrobin	2) In Aberdeenshire it is considered desirable to increase the upper range of the marketable land requirement at Westhill from 15 to 20 hectares to reflect the high demand for land at this location, the amount of housing allocated and help reduce the need to travel. For similar reasons it is considered that Banchory and Huntly should be identified as settlements with their own land allocations, especially as the latter is located on a main transport corridor containing the Aberdeen/Inverness railway line. For the same reasons it is not considered desirable to make any reduction in the allocation for Inverurie. It is not considered necessary to make separate entries for Turriff, Alford and Old Meldrum as they are allowed 5 hectares of marketable land at any one time by the policy. This should be adequate to meet their requirements and takes	2) Employment Policy 2 has been amended to increase the marketable land requirements for the Westhill from 5-15 hectares to 5-20 hectares. New allocations included at the following settlements in Aberdeenshire within the policy: Portlethen Corridor (including Badentoy and Moss-side/Cairnrobin) 10-30 hectares; Banchory 5-10 hectares; Huntly 5-10 hectares. Policy has been amended to clarify that the Inverurie Corridor includes Inverurie, Port Elphinstone and Kintore.
43.4 Mr D Scott, Halliday Fraser Munro, Robertson Group (Scotland) Limited	A study of employment land development trends over the past 10 years in the Aberdeen City Area reveals that the annual rate of development has ranged from a high of 26.5 hectares in 1992 to a low of 2.3 hectares in 1993. Between 1990 and 1999 the average rate of annual development equates to approximately 9.1 hectares. Whilst the Robertson Group (Scotland) Limited support the Council's proposal to allocate employment land within a minimum and maximum range it is considered that the figures specified for the Aberdeen City Area do not provide the comfort the economy needs to be responsive to wider economic influences. In view of this it is considered that the allocation for the Aberdeen City Area should be increased from 30-75 hectares to 50-125 hectares.	3) Several comments related to business parks. A "stand alone" business park to the south of the City is not favoured, as it would be more sustainable if the park is associated with industrial development, a new settlement at Banchory-Devinick or more centrally located within Aberdeenshire. A further comment favoured a location to the north of Portlethen for the business park in association with the single user site. It is also considered that there is not sufficient justification for a new business park and the proposal should be excluded from the Plan. 4) Concern is expressed that the Plan makes no reference to the expansion of the existing Technology Parks at Bridge of Don.	2) In Aberdeenshire it is considered desirable to increase the upper range of the marketable land requirement at Westhill from 15 to 20 hectares to reflect the high demand for land at this location, the amount of housing allocated and help reduce the need to travel. For similar reasons it is considered that Banchory and Huntly should be identified as settlements with their own land allocations, especially as the latter is located on a main transport corridor containing the Aberdeen/Inverness railway line. For the same reasons it is not considered desirable to make any reduction in the allocation for Inverurie. It is not considered necessary to make separate entries for Turriff, Alford and Old Meldrum as they are allowed 5 hectares of marketable land at any one time by the policy. This should be adequate to meet their requirements and takes	3) Employment Policy 2 has been amended to clarify that the business park to the south of the City should be located in the Portlethen Corridor. 4) Employment Policy 2 has been amended to allow consideration of extensions to specialist technology parks. 5) Employment Policy 2 has been amended to delete all reference to the need for local plans to allocate a single user site. 6) Green belt review to be progressed through local plans. 7) Employment Policy 2 has been amended to include reference to biodiversity and other issues that

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<p>43.6 Mr D Scott, Halliday Fraser Munro, Robertson Group (Scotland) Limited</p>	<p>Support is expressed for the Council's objective to ensure that there is 'a choice and range of employment sites in terms of quality, size and location.' Reports considered by Aberdeen City Council in recent years have also highlighted problems about the variable quality of sites, constraints on the release of land and an overall deficit in the choice of location, size and tenure of sites available, especially those needed to attract inward investment to the area. To ensure that a choice and range of sites are available in the Aberdeen City Area it is considered that the Structure Plan should contain a Policy requiring the identification of employment land at various locations across the city in accordance with sustainability criteria. In this context objectors are aware of an acute shortage of employment land in the Bridge of Don Area to the north of Aberdeen. There is a known demand from existing companies in this area to expand and a desire from other companies to develop there in view of the area's good links to all parts of the city, particularly to the major trunk roads and the harbour. It is therefore respectfully requested that the Bridge of Don Area be identified in the Structure Plan as a suitable location for the identification of employment land.</p>	<p>5) The need for a single user site is questioned and as to whether the site could be reserved for non-oil related industry. Good access to a railhead should be one of the criteria on which the location for a large industrial site for a single user should be determined.</p> <p>6) It is considered that there is a need for high quality business developments in greenfield locations and consideration should be given to this when reviewing green belt boundaries and delivering the Western Peripheral Route. Also the bulk of new industrial and business allocations should be in Aberdeen and its commuting circle. Concern is also expressed that directing new developments to greenfield locations would undermine the sequential approach as set down in NPPG 17. Existing peripheral locations are not easily served by public transport.</p>	<p>into account the capacity of these settlements to absorb further growth. It is accepted that there is a case for including Badentoy and Moss-side/Cairnrobin within the policy and this would best be addressed as an entry for the Portlethen Corridor, which emphasises the desirability of concentrating development along a major transport corridor, though avoiding coalescence. The part of the Moss-side/Cairnrobin site, lying within Aberdeen, will continue to count towards the City's allocation. In order to address the contention that excessive land has been allocated at Inverurie, the policy should be changed to clarify that the allocation applies to the Inverurie Corridor, which includes in addition to Inverurie, Port Elphinstone and Kintore.</p>	<p>local plans require to take into account when identifying development areas.</p> <p>8) Noted.</p> <p>9) Employment Policy 2 has been amended to include reference to sites for large petrochemical developments at St Fergus North and North Collielaw by Peterhead.</p>
<p>54.2 Mr M Ford</p>	<p>Good access to a railhead should be one of the criteria on which the large industrial site for a single user's location is decided. More generally, the need to site industrial activity that could send/receive goods by rail next to a railway should be addressed.</p>	<p>7) An addition to the policy is suggested which embraces biodiversity. It is also considered that clear justification should be provided for identifying the settlements in Employment Land Policy Two and the Structure Plan should give guidance to local plans on issues that require to be taken into account, e.g. landscape setting, flooding, bio-diversity, transport, pollution, etc.</p>	<p>3) It is considered that there is a strong case for a business park to the south of the City and this is considered in more detail in the Report of Survey and supporting documents. A site for a business park to the south of Aberdeen is currently being investigated by Aberdeenshire Council and they will be reporting on options early in 2001 with a view to incorporating the preferred site in the new Aberdeenshire Local Plan. It is accepted that the business park would be more sustainable if associated with other development and should therefore be located within the Portlethen Corridor.</p>	
		<p>8) Employment land allocations must demonstrate clearly the capacity and flexibility to handle a success scenario. Employment land allocations should also be related to</p>	<p>4) It is accepted that the Plan should</p>	

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<p>63.4 Ms E Parkes, NE Local Biodiversity Action Plan</p>	<p>The statement 'full account should be taken of environmental and infrastructure considerations' should be clarified and expanded to include a specific reference to biodiversity. The creation of new large-scale developments may result in loss, fragmentation and disturbance of habitat, potentially adversely affecting biodiversity. Suggested addition to policy: "Development on green field sites should only be approved if benefits to the community are shown to clearly outweigh environmental implications of the development. Steps should be taken to mitigate negative development impacts. To achieve this proposals should incorporate a requirement for habitat enhancement and creation, encouraging best practice in enhancing biodiversity and using Local Biodiversity Action Plan (LBAP) targets as a guide". Support for policy addition: NPPG 14 (19) states that "Planning authorities should seek to prevent further fragmentation or isolation (of habitats) and identify opportunities to restore links which have been broken". NPPG 14 (18) also states that "Planning authorities can make an important contribution to the achievement of biodiversity targets by adopting policies which promote and afford protection to species and habitats identified as priorities in LBAPs".</p>	<p>where housing development is planned.</p>	<p>take a more pro-active stance on the possible expansion of the existing technology parks at Bridge of Don, and work is currently being undertaken by the City Council as part of the Structure Plan review process, examining the potential of the City's green belt to absorb further development. Once completed this work will assist the Aberdeen City Local Plan in identifying the potential for expansion of the technology parks at Bridge of Don.</p>	
<p>69.1 Mr S Partington, Muir Group</p>	<p>The 20 hectare Business Park and 10-30 hectare general industrial site should be juxtaposed and located to the south of Aberdeen to relate to existing patterns of development and transport infrastructure in the interests of sustainable economic growth.</p>		<p>5) It is accepted that the need for a single user site in the North East is unlikely and that it would be inappropriate to identify a specific site at the current time, though the the requirement should be kept under review. Urgent need for a site could be addressed from proposed land allocations in Aberdeen or through Employment Policy Three.</p>	
<p>72.4 Mr B Wallace, GVA Grimley, Invervale Ltd</p>	<p>There has long been a gap between intention and achievement in the North East. The two Planning Authorities and Grampian Enterprise accept that there is a shortfall of marketable employment land. The employment allocation for Oldmeldrum should be increased in the interests of sustainability associated with new housing in Oldmeldrum as well as the need to offset commuting. The figure of 5-10 hectares should apply to Oldmeldrum</p>		<p>6) The Aberdeen greenbelt review referred to above will identify potential new development locations in Aberdeen. This will assist the Aberdeen City Local Plan to identify new industrial and business sites in accordance with the Structure Plan. A similar exercise in Aberdeenshire will be carried forward through the new Aberdeenshire Local Plan.</p>	
			<p>7) It is also accepted that further guidance be provided in the Plan on biodiversity and issues that require to be taken into account by local plans in identifying development sites.</p> <p>8) It is considered that proposed</p>	

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<p>73.2 Mr D Scott, Halliday Fraser Munro</p>	<p>A study of employment land development trends over the past 10 years in the Aberdeen City Area reveals that the annual rate of development has ranged from a high of 26.5 hectares in 1992 to a low of 2.3 hectares in 1993. Between 1990 and 1999 the average rate of annual development equates to approximately 9.1 hectares. The Council's proposal to allocate employment land within a minimum and maximum range is supported, but it is considered that the figures specified for the Aberdeen City Area do not provide the comfort the economy needs to be responsive to wider economic influences. In view of this it is considered that the allocation for the Aberdeen City Area should be increased from 30-75 hectares to 50-125 hectares. It is noted that the Structure Plan does not contain an appendix specifying the marketable business land at 1st January 2000 and it is requested that this be included in the Finalised Document.</p> <p>The Structure Plan should contain a Policy requiring the identification of employment land at various locations across the city in accordance with sustainability criteria to a choice in range of sites in the Aberdeen City area. It is felt that there is a shortage of employment land in the Bridge of Don Area to the north of Aberdeen, and a demand from existing companies in this area to expand and a desire from other companies to develop there in view of the areas good links to all parts of the city; particularly to the major trunk roads and the harbour. Such being the case, the Bridge of Don Area should be identified in the Structure Plan as a suitable location for the identification of employment land.</p>		<p>changes to the Plan will help provide the policy framework to deliver continued prosperity for the North East of Scotland.</p>	
<p>74.3 Mrs R A Henderson, Cove and Altens Community</p>	<p>It appears that "to the South of the City" now includes all the land within the Structure Plan area lying south of the City, and is no longer regarded as being within the City boundary. Can the Council confirm that this is the case?</p>			
<p>74.4 Mrs R A Henderson, Cove and Altens Community</p>	<p>Clarification is required as to why existing commitments at Badentoy and Mains of Cairnrobin are not included in Employment Land Policy 2. The two sites have a wider impact than what? Why can they not be considered to be part of any land requirement attributed to Portlethen or Aberdeen?</p>			

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74.5 Mrs R A Henderson, Cove and Altens Community	Does the NPPG allow for the proposed single user site of 10-30 hectares being dedicated to non-oil related industry? Diversification is of as much, if not more, importance to the Aberdeen area as is inward investment.			
78.1 Mr R A Drysdale, Robert Drysdale Planning Company Ltd, Weshill Development Company Ltd	Westhills should have an Employment Land Supply of 15 hectares; not 5.			
112.3 Mr P Clarke, Barton Willmore Partnership, The Countesswells Consortium	A Policy requirement for the provision of employment land including land for high quality business parks located close to transport corridors would assist in achieving objectives for the economy, providing opportunities for companies already within Aberdeenshire and also for potential inward investors.			
113.3 Mr P Clarke, Barton Willmore Partnership, Stewart Milne Group	Policy requirement for the provision of employment land including land for high quality business parks located close to transport corridors will assist in achieving objectives for the economy, providing opportunities for companies already within Aberdeenshire and also for potential inward investors. The provision of the required business park as an integral part of a new settlement at Banchory Devenick would provide a strategic "gateway" location; it would assist in enhancing the Regions portfolio of business land; it would make the best use of infrastructure, including the transportation network and transportation proposals, such as WPR; reducing commuting and promoting two-way travel to work patterns. The business park could be provided as a phased development in advance of or independently from other elements of the new settlement in order to fulfil the acknowledged early policy requirement.			
115.1 Mr I Michie, Montagu Evans, Kirkwood/Wattie	Support is expressed for the principle that Local Plans should identify sites within settlements in rural areas where there are opportunities to satisfy demand. Equally where there is very little demand, as in the case of Alford, it is suggested that the Employment Land Distribution should reflect this and allocate smaller areas accordingly.			

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116.5 Mr R Keeler, North Kincardine Rural Community Council	No justification has been given for the proposed 20 ha. Business park, and no site has been identified in the Local Plan, and so this proposal should be excluded from the structure plan.			
116.10 Mr R Keeler, North Kincardine Rural Community Council	A 30 ha. site for a single user implies that a particular industry has already been identified. If the requirement for single use (the objector may be confusing 'user' and 'use') is maintained piecemeal minor development which would be inappropriate on a large site is likely.			
116.11 Mr R Keeler, North Kincardine Rural Community Council	The policy of allowing 5 hectares marketable land for employment in any settlement is only sensible where housing development is planned, because labour may not be available locally.			
123.7 Ms A Harvie, Aberdeen Chamber of Commerce	There is a golden opportunity for the Local Authorities to set out aspirations to create high quality business developments under firm planning guidelines. The Plan should allow for such developments within the existing Green Belt. It must be possible for Aberdeen to emulate or even improve upon examples such as Edinburgh Park. In particular the Chamber believes that the region deserves and requires a world-class gateway development such as a high-amenity business park in attractive surroundings south or west of the City (for example near the Charleston Interchange area or on the proposed Western Peripheral Road).			
123.8 Ms A Harvie, Aberdeen Chamber of Commerce	It is agreed with Paragraph 2.3.6 that a promotional stance is needed. Rather than hope for an upturn, policy needs to be directed towards encouraging the growth of existing business and attracting inward investment. Therefore employment land allocation must demonstrate the capacity and flexibility to handle a "Success Scenario". The plan is not clear on how this will be done as presently written.			

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123.27 Ms A Harvie, Aberdeen Chamber of Commerce	The balance of employment land allocations in the plan between Aberdeen City and the rural settlements is questioned. It is expected that the bulk of employment land demand would be in Aberdeen City and its commuting circle. It is also not clear why Huntly is not given any allocation when it is at least on the rail line (unlike Peterhead/Fraserburgh). This appears inconsistent with the intent of the plan to site development near the transport system.			
128.3 Mr S Harrison, Bruce & Partners, Scotia Homes Ltd	Greater consideration should be given to the further allocation of employment land, where marketable, in outlying settlements - particularly towns such as Ellon, Inverurie, and Banchory where housing growth is promoted. This would reduce the need to travel to established employment locations - particularly on the outskirts of Aberdeen where public transport links are poor.			
140.3 Mr K Newton, Formartine Partnership	Surely the 'major' settlements in the table of marketable land requirements should include Turriff as far as Formartine is concerned, since it is the largest town which is dependent on non-oil activity and its large agriculture-related component makes it vulnerable and a key centre requiring increased economic activity. Again, in this sector there should be some effort to identify requirements for the more rural areas.			

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149.10 Mr E Gillespie, Scottish Enterprise Grampian	Support is expressed for the requirement for high quality business park provision in the North East and particularly in Aberdeen. Such provision is a pre-requisite to cater for technology companies and others wishing a quality business environment. Support for the size, number and location of future parks should, however, be based on projected and prevailing demand conditions and assessed on a case by case basis. Research confirms the demand for business park provision. However, it did not specifically suggest the need for two business parks. The Business Park near Aberdeen Airport now has planning permission and when implemented will be an interesting measure of demand. It is located adjacent to an established and expanding industrial park but will benefit from its own identity and a higher quality of landscaping. Such an approach south of the City may be preferable to a "stand alone" business park. Conversely there may be a need for an entirely different approach south of the City to minimise competition between the two locations whilst increasing the attraction of Aberdeen in comparison with elsewhere in Scotland.			
149.11 Mr E Gillespie, Scottish Enterprise Grampian	Whilst the requirements of National Planning Policy Guidance in terms of identifying a site of between 10 ha and 30 ha are recognised, the prospects of a single user taking up a site of this scale in the North East must be considered remote. If such a site is identified as required by Employment Land Policy 2, there should be a caveat that it could be released for a multi-occupier use within a specific timeframe should demand for development land outstrip supply. It is not clear from the supporting text nor from the Policy whether the single user site would form part of a larger industrial park or would be a separate site set aside and specifically protected for such a use. The latter approach could well have a blighting effect on prosperity within the identified area when in fact there could be little prospect of development.			

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149.13 Mr E Gillespie, Scottish Enterprise Grampian	The exclusion of Badentoy and Mains of Cairnrobin commitments, as intimated in paragraph 2.3.8, from Employment Land Policy 2 appears illogical particularly because of their "wider impact on the supply and demand for employment land in the North East" and more particularly the Aberdeen Area market. Acknowledgement of these sites should be made in Employment Land Policy 2. In relation to technology parks it is disappointing that there is no reference to the expansion of the existing parks (Aberdeen Science and Technology Park & Aberdeen Offshore Technology Park). The preference would appear to be the identification of new parks rather than the expansion of existing parks. The sustainability of this approach is questioned when there is undoubted scope for existing parks to expand. It is interesting to note that at paragraph 2.3.3 the Plan already accepts that "business parks and other special employment uses may only be suited to greenfield locations". This supports the argument for expanding the existing parks into adjacent greenfield/open space sites.			
149.14 Mr E Gillespie, Scottish Enterprise Grampian	Because of their size and significance to the Aberdeen area market, Employment Land Policy 2 requires to be amended to reflect the allocations at Badentoy and Mains of Cairnrobin. Further consideration should be given to the requirement for a business park to the south of the City.			
155.3 Mr J W Findlay, Jenkins & Marr, A & E Sorrie Farmers Ltd.	Support is given for the need to maintain a marketable supply of employment land in Aberdeenshire, however, it is believed that the amount of land advocated by Employment Land Policy 2 for Inverurie to be excessive.			
163.3 Mr C Howden, Transform Scotland	Objection is made to the statement in Para 2.3.3 that "business parks and other special employed uses requiring high quality or high profile locations may only be suited to greenfield locations" because this will encourage developers to argue for special treatment and undermine the sequential approach in NPPG17.			
163.7 Mr C Howden, Transform Scotland	Existing business parks and other special employment uses at peripheral sites are difficult to access via by public transport. This fact should be noted, and sustainable access should be given prime importance when designating business parks and employment land.			

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164.6 Dr R A MacDonald, Scottish Natural Heritage	Doubt is cast as to whether the Structure Plan has itself identified the locations for new development named within it. A clearer justification is required for naming these settlements in relation to the issues identified in the policy statement. Furthermore. The Structure Plan should give a clear steer on what issues need to be taken into account when defining allocations in detail in the Local Plan. For example, it considers that it is important that each settlement is assessed in terms of the planning issues that are particularly relevant to sustainable development. This may be landscape setting and quality, flooding, biodiversity, transport, pollution or a range of other issues covered by plan policies. The settlements should then be assessed to identify where and how (in terms of location, design and management) development could be accommodated in a manner that complies with those sensitivities. The conclusions should be justified against the criteria set. In order to promote the concept of community planning, and the views of the local communities sought when undertaking these assessments.			
175.2 Mr I Munro, Ian Munro Planning & Development Consultant, Alfred McAlpine Developments Ltd	The required 'Business Park' to the south of Aberdeen and the 10-30 hectare general industrial single user sites should be directed to the land to the north of Portlethen (see plan) where provision could be made for the southern junction of the Western Peripheral Route with the A90. Development of this land in association with the WPR/A90 junction would provide the best strategic option and would be attractive to industrialists because of good communications.			

Source	Summary of Comments	Summary of Points	Analysis	Action
40.1 Mr G J Cooper	Appropriation of new land unjustified when no information on take-up of existing land is given in the Plan.	1) There is broad support for Employment Land Policy One from a number of the respondents, however concern is expressed about the ability of local plans to deliver the amount of industrial and business land required, particularly where there are constraints to be overcome. In such circumstances it is believed that there is a need for an additional policy to release land in advance of local plan preparation.	1) The issue of overcoming constraints associated with certain zoned sites is one that the two local planning authorities are aware of and are closely monitoring. It is not an issue that can readily be addressed by the planning system, however, as many of the constraints relate to infrastructure and land ownership, factors which are likely to apply also to any new sites that are allocated. It is an area, however where NESEDP (North East Scotland Economic Development Partnership) are already involved and will continue to address. It is not considered appropriate to have an additional policy to release land in advance of local plan preparation as that issue can presently be dealt with through the development plan departure procedures.	1) No change to Employment Policy 1. No additional policy.
43.1 Mr D Scott, Halliday Fraser Munro, Robertson Group (Scotland) Limited	The Council's objectives outlined in Paragraph 2.1.3 to ensure 'that there should be a choice and range of employment sites in terms of quality, size and location.' are supported. The Council's intention to increase the marketable supply of employment land to attract inward investment as outlined in Paragraph 2.2. is also supported.	2) It is suggested that the policy needs to be more pro-actively worded, that there should be a definition of "marketable supply" (a minimum of 10 years supply of land) and information on historical land take-up included in the Plan.	2) It is considered that there is considerable merit in rewording Employment Land Policy One to make it more pro-active. A full definition of "marketable land" is given in NPPG 2 - Business and Industry.	2) Employment Policy 1 has been amended to be more pro-active.
43.2 Mr D Scott, Halliday Fraser Munro, Robertson Group (Scotland) Limited	The Robertson Group (Scotland) Limited supports the requirement of the Structure Plan to ensure that Local Plans will maintain a marketable supply of business and industrial land throughout the plan period. However, they wish to express their concern that the Plan does not contain a definition of 'marketable supply'. The Robertson Group (Scotland) Limited considers that a minimum 10 years supply of Employment Land is required in the Aberdeen Area to meet the objectives outlined in the Structure Plan. The annual requirement should be calculated from an analysis of development trends over the past 10-20 years.	3) Monitoring of land is referred to in the policy and it is considered that this should be a mandatory process, particularly as in some locations there is a huge discrepancy between supply and demand. New sites require to be brought forward and sites with no prospect of development re-zoned for other purposes or in the case of former Green Belt sites which are no longer marketable, revert back to Green Belt.	3) Monitoring of the supply and demand of land is currently carried out on an annual basis and information on historical take-up of industrial and business land is provided in the Structure Plan Report of Survey. There needs to be cross-referencing between the Plan, the Report of Survey and Report of Survey Addendum. Reference should also be made to over-zoning and re-zoning of land in the policy in order to provide guidance to local	3) Cross referencing has been introduced to cover the monitoring of land supply in the Plan with the Report of Survey and Report of Survey Addendum. Guidance has been provided to local plans on over-zoning and re-zoning of land.
43.3 Mr D Scott, Halliday Fraser Munro, Robertson Group (Scotland) Limited	In recent years the Aberdeen Area has suffered from a chronic shortfall in the supply of marketable employment land with the result that employment creating opportunities have been lost to other areas of Scotland. Experience has shown that Local Plans cannot be relied upon to maintain an adequate supply of employment land and in view of this objectors suggest the incorporation of a policy which allows for the release of land in advance of local plan preparation if it is required to maintain a marketable supply.	4) It is considered that the policy needs to set out the strategic context and criteria for identifying and maintaining a marketable supply of employment land, so that local plans can contain the details of the marketable supply of land for industry and business. More information on proposals to critically		4) Structure Plan Strategy has been amended to define more clearly the context for the Plan and its policies.
43.5 Mr D Scott, Halliday Fraser Munro, Robertson Group (Scotland) Limited	It is noted that the Structure Plan does not contain an appendix specifying the marketable business land at 1st January 2000. It is respectfully requested that this be included in the Finalised Document.			5) No change to Plan.
				6) No change to Employment Policy 1. Pollution issues have been addressed in text and policies of the Plan.

Source	Summary of Comments	Summary of Points	Analysis	Action
44.23 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Report of Survey Section 5: Why is "Waste Management" and the "Area Waste Plan" included in this section? It is not a resource in the environment of the North East. It would be better sited with "Industry and Commerce" considerations since the bulk of waste arises from this source.	assess land within Green Belts as part of any development plan review is required. Revised Green Belt boundaries must take account of the need to continue to provide greenfield land for business, industry and housing.	plans. 4) It is proposed that the Structure Plan Strategy will be re-drafted to more clearly define the context for the Plan and its policies. The criteria, for identifying and maintaining a marketable supply of land for business and industry are already covered by Employment Land Policy Two. Reference is made in the "Looking after the North East" section of the Plan to the requirement for local plans to critically assess their green belt boundaries as part of the development plan review process.	
73.1 Mr D Scott, Halliday Fraser Munro	Support is expressed for the requirement of the Structure Plan to ensure that Local Plans will maintain a marketable supply of business and industrial land throughout the plan period, together with concern that the Plan does not contain a definition of 'marketable supply'. It is felt that a minimum 10 years supply of Employment Land is required in the Aberdeen Area to meet the objectives outlined in the Structure Plan., and that the annual requirement should be calculated from an analysis of development trends over the past 10-20 years. It is felt that the that Local Plans cannot be relied upon to maintain an adequate supply of employment land and it is suggested that a policy should be added which allows for the release of land in advance of local plan preparation if it is required to maintain a marketable supply.	5) It is not clear in the Plan if Employment Land allowances make provision for accommodating the requirements of waste management and renewable energy. These issues should be considered in the Employment section of the Plan. 6) Pollution arising from industrial development requires to be avoided if at all possible.	5) Some of the requirements for land for waste management and renewable energy will be met from the Employment Land allocations in Employment Policy 2. It is likely that their will be land requirements outside of allocated sites and these will be evaluated against Employment Policies 3 and 5, in addition to other relevant structure plan policies.	
74.6 Mrs R A Henderson, Cove and Altens Community	As the objector understands it, the concept of the Structure Plan is that it shall estimate the land area required to accommodate the likely demand over the Structure Plan period. The concept of "marketable land" is alien to this, as land can become marketable in response to economic pressure. If further Green Belt sites are allocated for industrial use on the basis that already designated industrial land is deemed non-marketable; the latter should revert to Green Belt status to maintain the Green Belt balance.		6) It is accepted that pollution arising from all development needs to be minimised or eliminated if possible. Pollution issues are covered in more detail in other areas of the plan.	
123.6 Ms A Harvie, Aberdeen Chamber of Commerce	Policy Statement "Employment Land 1" is surely only what NPPG2 requires! This policy statement should be a much more aggressively worded commitment to delivering affordable, attractive and available employment land supply to promote economic growth.			
123.32 Ms A Harvie, Aberdeen Chamber of Commerce	It is also not clear if the employment land allowances elsewhere in the plan include allowance for the necessary industrial plant for waste management and renewable energy.			

Source	Summary of Comments	Summary of Points	Analysis	Action
125.4 Mr B Wallace, GVA Grimley, Barratt Construction Ltd	There is an acknowledged shortfall of marketable employment land in the North East of critical dimensions and NEST fails to to increase the employment land allocations for settlements in the NE over the extant Grampian Structure Plan. There is no identifiable basis for securing the delivery of employment land.			
126.1 Mr B Wallace, GVA Grimley, G Gaffney	It is essential that the long standing discrepancy in Aberdeenshire between intention and achievement in the provision of a marketable supply of appropriate employment is overcome.			
141.1 Ms R Rush, SEPA North Region	To protect the environment pollution should be avoided in the first instance, and then reduced and controlled where it is unavoidable or already existing. We recommend that the last sentence of paragraph 2.1.3 is amended to reflect this.			
141.2 Ms R Rush, SEPA North Region	If monitoring determines that during the life of the plan additional land for development is required to be zoned, what consultation will there be about proposed zonings?			
149.5 Mr E Gillespie, Scottish Enterprise Grampian	The aims of providing a choice and range of employment sites in terms of quality, size and location as set out in paragraph 2.1.3 are generally welcomed. However, the Plan should recognise that there is currently a shortage of business and industrial land. It is important to identify a range of sites capable of early development; to re-examine existing zoned land to establish constraints on development and to examine ways of alleviating those constraints; and, to re-zone for other purposes those sites which have little or no likelihood of being developed. These issues all require to be addressed along with the mechanisms to ensure deliverability.			

Source	Summary of Comments	Summary of Points	Analysis	Action
149.6 Mr E Gillespie, Scottish Enterprise Grampian	Paragraph 2.2.2 acknowledges that local companies are experiencing difficulties in finding expansion or relocation land. Lack of economic viability is not the sole justification; evidence of market failure such as the imbalance of supply and demand need to be equally proven. Resources must be carefully targeted to ensure maximum benefit and it is suggested that the word "key" should be inserted instead of "these" in the penultimate sentence of the paragraph so as to emphasise this. Regarding the monitoring of the take up of employment land; it is suggested that this should be a mandatory process to reflect the difficulty with the lack of land and the importance of it to the economy. The bodies responsible for this monitoring should also be clearly stated.			
149.7 Mr E Gillespie, Scottish Enterprise Grampian	It is envisaged in paragraph 2.2.4 that Local Plans will have an important role to play in land assembly and allocation of sites for employment uses. Unfortunately, previous Local Plans have not proved particularly successful in terms of land assembly and it is questioned as to whether this will change in the future. Perhaps more consideration should be given to the means of achieving this through consultation with all the relevant bodies. Local Plans should also have an important role in reviewing the ongoing suitability and deliverability of allocated employment land and "de-zoning", if necessary, land that has proven undeliverable within a respectable timescale.			
149.8 Mr E Gillespie, Scottish Enterprise Grampian	The terms of Employment Land Policy 1, in ensuring that Local Plans maintain a marketable supply of business and industrial land throughout the plan period, is welcomed. However, the Policy should be expanded to require the provision of an improved choice and range of sites in terms of quality, size and location. Also, in light of the above, the requirement for monitoring should be expanded to allow new sites to be brought forward as and when required and to re-zone those sites which have no prospect of development. In rural Aberdeenshire in particular the industrial land review has highlighted a huge discrepancy between supply and demand in certain locations and this requires to be addressed.			

Source	Summary of Comments	Summary of Points	Analysis	Action
149.18 Mr E Gillespie, Scottish Enterprise Grampian	More information on the Councils proposals to "critically assess land within green belts as part of any development plan review" is required. Such an assessment is essential in the consideration of suitable and deliverable employment land for allocations within the Plan period and also particularly in considering the need for a longer term supply. The impact of the Western Peripheral Route on the Green Belt must also be considered and together both will have major implications for the location of future development land in the period 2006-2016. The revised Green Belt boundaries must take account of the need to continue to provide greenfield land for business, industry and housing.			
164.5 Dr R A MacDonald, Scottish Natural Heritage	The text explains the need to promote the economy to face future challenges and provide diversified employment opportunities in sustainable locations. This aim is not translated into the policies that then follow. In particular: Policy Employment Land 1 does not set out the strategic context for employment. The policy should define the strategic context and criteria for identifying and maintaining a marketable supply of employment land so that local plans can contain the details of the marketable supply of land for industry and business.			

Source	Summary of Comments	Summary of Points	Analysis	Action
6.3 Mr A Bradford, Kincardine Estate	Employment Land Policy 3 should require all but very small proposals to be subject to an environmental assessment taking into account a comparison of the environmental impacts of the proposal with the impact of such a proposal or a modified one perhaps in a different location i.e. the alternatives to the proposal should be taken into consideration. e.g. The proposed waste incinerator in Deeside is a case in point. The environmental impact of a waste incinerator would be far smaller if: 1. it were nearer the source of waste; and, 2. it made use of the waste heat produced by the process rather than just generated electricity; 3. it generated electricity more efficiently.	1) Employment Land Policy 3 is not considered to give sufficient weight to environmental considerations. The conservation/wildlife value of land requires to be taken account of. A number of amendments to the policy are suggested: " It is considered that proposals outside urban areas should only be approved if benefits to the community are shown to clearly outweigh environmental implications of the development. Steps should be taken to mitigate negative development impacts. To achieve this proposals should incorporate a requirement for habitat enhancement and creation, encouraging best practice in enhancing biodiversity and using Local Biodiversity Action Plan (LBAP) targets as a guide." " Proposed employment uses are acceptable if they can demonstrate an economic need which balances with environmental issues and social objectives, such as social inclusion." "The proposal does not adversely impact on the environment, or create pollution." "Proposed employment land uses that fall outside local settlements will be considered acceptable if they can demonstrate etc...and will be actively encouraged on brownfield sites." "The policy should require all but very small proposals to be subject to an environmental assessment."	1) It is proposed that the Employment Policy 3 be changed to make it clear that it covers employment uses on unallocated sites. It is also accepted that there is merit in the various amendments suggested to the policy and that changes should be made to the policy wording to reflect this. 2) It is agreed that Employment Policy 3 should emphasize the importance of public transport links whilst seeking to avoid discriminating against rural areas. Changes to the wording of the chapter text and policy will be made to reflect this. 3) The importance of renewable energy to the future economy of the North East is recognised and a specific policy on renewable energy should be included in this chapter of the Plan. 4) The interest in the development of the Edzell airforce base is noted. This can be dealt with in the context of Employment Policy 3 and guidance set down in local plans. Outline planning permission has been granted by Aberdeenshire Council for a proposal consisting of business and industrial uses, open storage and residential uses. Consent for this proposal will not be released until a Section 75 Legal Agreement is signed. 5) The support for Employment Policy 3 is welcomed.	1) Employment Policy 3 has been amended. 2) Employment Policy 3 and wording of text of "Working in the North East" chapter have been amended. 3) Policy on renewable energy has been included in this chapter of the plan. 4) Noted. 5) Noted.
43.7 Mr D Scott, Halliday Fraser Munro, Robertson Group (Scotland) Limited	Support is expressed for the incorporation of a policy within the Plan, which allows for the development of employment uses on sites, which fall out with settlements.			
44.32 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Many "derelict" sites have through time and disuse developed high wildlife values. They are therefore not necessarily automatically a good location for proposals for employment uses.			
50.1 Mr C Robertson, Angus Council	Continuing interest is expressed in respect of development of the former RAF Edzell base.			
54.9 Mr M Ford	The scope for creating employment by promoting renewable energy as a logical continuation of present oil-related activities should be explored in this section as well as elsewhere.			

Source	Summary of Comments	Summary of Points	Analysis	Action
63.2 Ms E Parkes, NE Local Biodiversity Action Plan	<p>The creation of new developments may result in loss, fragmentation and disturbance of habitat, potentially adversely affecting biodiversity. This potential effect on biodiversity should be clearly addressed in the criteria for this policy.</p> <p>An Addition to policy should be added to read : "Proposals outside urban areas should only be approved if benefits to the community are shown to clearly outweigh environmental implications of the development. Steps should be taken to mitigate negative development impacts. To achieve this proposals should incorporate a requirement for habitat enhancement and creation, encouraging best practice in enhancing biodiversity and using Local Biodiversity Action Plan (LBAP) targets as a guide".</p> <p>Support for policy addition: NPPG 14 (19) states that "Planning authorities should seek to prevent further fragmentation or isolation (of habitats) and identify opportunities to restore links which have been broken". NPPG 14 (18) states that "Planning authorities can make an important contribution to the achievement of biodiversity targets by adopting policies which promote and afford protection to species and habitats identified as priorities in LBAPs".</p>	<p>2) Employment Land Policy 3 should stress the importance of public transport links, though the requirement for a choice of transport to be available discriminates against rural areas.</p> <p>3) The scope for creating employment by promoting renewable energy as a logical continuation of present oil-related activities should be explored.</p> <p>4) There is continuing interest in the development of the former RAF Edzell base.</p> <p>5) Support for policy.</p>		
70.2 Ms J Bryce, Scottish Wildlife Trust	<p>This section makes no mention of the fact that the conservation value of the land will be taken into consideration when considering if development is appropriate.</p>			
73.3 Mr D Scott, Halliday Fraser Munro	<p>Support is expressed for the incorporation of a policy within the Plan, which allows for the development of employment uses on sites, which fall outwith settlements.</p>			
111.2 Ms J Geddes, Association for the Protection of Rural Scotland	<p>This policy is considered to imply primacy as regards "economic need" and does not give sufficient weight to environmental considerations. The following re-wording is suggested: "Proposed employment uses ... acceptable if they can demonstrate an economic need which balances with environmental issues and social objectives, such as social inclusion."</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
140.4 Mr K Newton, Formartine Partnership	Employment Land Policy 3 should stress the importance of public transport links. Present working suggests it will be acceptable providing cars can get in, but this isn't a sustainable option.			
140.24 Mr K Newton, Formartine Partnership	The suggestion (2.4.2) that employment proposals should be located where a choice of transport can be offered patently discriminates against more rural areas and should be removed. It is obvious that those drawing this up are working in an urban situation with no real feeling for the problems of the more rural areas.			
140.26 Mr K Newton, Formartine Partnership	Employment Land Policy 3 should read "Proposed employment land uses that fall outside local settlements ... will be considered acceptable if they can demonstrate. etc" and should have the words ("and will be actively encouraged on brownfield sites") inserted after acceptable.			
141.3 Ms R Rush, SEPA North Region	Sewage treatment works are more commonly referred to as Waste Water Treatment Plants (WWTP) nowadays. It may be beneficial to amend this reference in the document.			
141.4 Ms R Rush, SEPA North Region	The criteria list against which development will be judged does not cover potential environmental impact. It is recommended that a bullet point is added to read: 'The proposal does not adversely impact on the environment, or create pollution'.			

Source	Summary of Comments	Summary of Points	Analysis	Action
13.2 Mr CR Hunneyball, Kemnay Community Council	What are the new employment opportunities envisaged?	1) The need for opportunities to diversify the economy is recognised in paragraph 2.3.5. and in this respect it is considered that specific mention requires to be made of the importance of knowledge based businesses. Special mention also requires to be made of the significant contribution made by higher education to the North East's economy and a policy included in the plan to reflect this.	1) It is agreed that amendments should be made to the text of the structure plan in recognition of the importance of knowledge based businesses and higher education to the economy of the North East. It is not accepted, however, that a specific policy relating to higher education requires to be included in the plan. This is more appropriately dealt with as part of the NESEDP Economic Development Strategy for the North East. At a more detailed level the use of higher education sites is controlled through local plan policies.	1) Text of Working in the North East Chapter has been amended.
44.30 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	It is not just Tourism that offers opportunities to broaden the base of the economy and promote economic growth and development, although it is agreed that the natural (and historic) environment largely attracts visitors to the area. Employment is also derived from countryside recreation provision and from the care and interpretation of the natural environment, and the Plan should acknowledge this.	2) The Plan requires to acknowledge the contribution countryside recreation and the care and interpretation of the natural environment make to economic growth. 3) Examples other than tourism require to be given for diversification of the area's economy.	2) It is agreed that amendments should be made to the text of the structure plan to acknowledge the contribution countryside recreation and care and interpretation of the natural environment make to economic growth.	2)Text of Working in the North East Chapter has been amended. 3) Text of Working in the North East Chapter has been amended.
119.1 Mr B Wallace, GVA Grimley, University of Aberdeen	The draft Structure Plan fails to refer to the significant contribution made by the Higher Education sector as a whole to the well being of the North East. The university has major land and property interests within the City of Aberdeen. The university must continue to utilise its assets through the expansion of existing locations and redevelopment of other sites to achieve the highest standard of educational facilities possible . A policy should be included which encourages the consolidation and development of Higher Education.	4) The role of NESEDP in facilitating development is misrepresented in the Plan and should be changed to reflect that NESEDP will determine projects which merit assistance on a strategic basis.	3) It is agreed that there needs to be greater emphasis in the structure plan on diversification of the area's economy.	4)Text of Working in the North East Chapter has been amended.
140.1 Mr K Newton, Formartine Partnership	The statement that the employment base needs to be diversifying is not backed up with any examples other than tourism - perhaps it should show how the strengths of the North East's economy can be combined or offer suggestions of industries that aren't very 'location specific'.		4) It is agreed that clarification is required in the structure plan regarding the role of NESEDP.	
149.12 Mr E Gillespie, Scottish Enterprise Grampian	The need for opportunities to diversify the economy is recognised in paragraph 2.3.5 and in this regard the importance of knowledge based businesses warrants specific mention here. There are many high growth businesses creating high value jobs, which should be recognised and supported. The final sentence of this paragraph suggests a strategy of employment dispersal; this is beneficial provided it is equally recognised that some key locations within or close to Aberdeen must still attain critical mass.			

Source	Summary of Comments	Summary of Points	Analysis	Action
149.15 Mr E Gillespie, Scottish Enterprise Grampian	The suggestion that NESEDP can facilitate development through financial assistance in paragraph 2.4.4 is misleading. It is rather the case that NESEDP members collectively determine those projects which merit assistance on a strategic basis and agree to provide funding..			

Source	Summary of Comments	Summary of Points	Analysis	Action
11.1 Mrs M Parfitt, Donside Community Council, C Wallace, Brideswell, Cushnie	Issue of major restructuring within agriculture not addressed. As farms get larger will part-time crofts/small farms such as a 30 acre part-time unit with landscaping be permitted to counter prairie farming ?	1) This chapter lacks strategic context for the development of the local primary resource industries, in particular fishing, forestry and agriculture. Concern is expressed over the lack of discussion of, and the failure to formulate policies for, the primary industries, with particular regard to their relevance for sustainable development.	1) The structure plan strategy gives support to the area's primary industries. It is agreed, however, that this support requires further clarification in the text of the Working in the North East Chapter of the plan.	1) Text of Working in the North East Chapter has been amended. 2) Reference has been included in Report of Survey Addendum.
44.6 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	The decline and diversification of agriculture not only results in environmental impacts but can offer opportunities for enhanced nature conservation. This topic seems to be totally ignored in the Report of Survey.	2) The decline and diversification of agriculture offers opportunities for enhanced nature conservation.	2) It is agreed that decline and diversification of agriculture offers opportunities for enhanced nature conservation. This should be explained further in the Report of Survey Addendum.	3) Noted. No change.
44.12 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Para 3.1 on page 7 mentions that the area of the plan specialises in the primary industries but there is no examination of such industries in this section, nor of the leisure industry.	3) The Plan should contain a policy on pipelines.	3) Mention is made of the encouragement given by the plan, in Transport Policy 2 and the text of the Moving About the North East Chapter, to the improvement of pipeline infrastructure in the North East. Matters relating to pipelines are dealt with through other legislation and procedures. Development that may impact on existing pipelines is covered by consultation safeguarding procedures, which are supported by local plan policies. It is not believed, therefore, that there is need to include a specific policy on pipelines in the plan.	
44.13 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Changes to fishing and forestry employment are surely relevant to "Working in the North East", as is the increase in recreation, conservation and interpretation jobs.			
86.1 Mr J W Findlay, Jenkins & Marr, BP Exploration Operating Company Ltd.	The plan should contain a Policy on pipelines. The objector feels that GSP Transportation Policy 26 'Pipelines' addressed the issue sufficiently, and wishes to see it introduced into NEST.			
141.57 Ms R Rush, SEPA North Region	There is a lack of reference to the forestry industry. In particular the Structure Plan needs to ensure that there are local facilities and infrastructure to provide for the forestry sector and that environmental considerations are taken into account for further development of this industry. This should be addressed by this document considering the importance of this primary industry in North East Scotland.			
164.8 Dr R A MacDonald, Scottish Natural Heritage	This chapter also lacks a strategic context for the development of the local primary resource industries including fishing, forestry and agriculture. There should be a clear policy for the promotion of local use of local primary produce from these industries as an important contribution towards sustainable development.			

Source	Summary of Comments	Summary of Points	Analysis	Action
6.2 Mr A Bradford, Kincardine Estate	Request that villages be inserted between "existing" and "towns" in Written statement Paragraph 2.2.3, so that the sentence reads : "Another part of this is to maintain the vitality and viability of existing villages, towns and city centres and to provide employment opportunities close to where people live."	1) The Plan should emphasize the disadvantaged situation of some rural households, particularly with regard to the lack of employment opportunities and impact of high fuel costs. In this respect the Plan should stress the need to extend the Objective 2 Area to cover a greater area of the North East.	1) It is accepted that the structure plan should place strong emphasis on protecting and enhancing employment opportunities in rural areas. This is emphasized in the structure plan strategy and the text of the Working in the North East Chapter. The Objective 2 Area boundary was fixed in December 1999, and cannot be amended through the structure plan. The need for an extension to the Objective 2 Area boundary would more appropriately be pursued through NESEDP.	1) Structure plan strategy and the text of the Working in the North East Chapter has been amended to emphasize the protection and enhancement of employment opportunities in rural areas.
44.31 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Observation made that many industrial estates in rural settlements lie virtually empty.	2) The Plan should designate rural as well as settlement related business areas, especially as additional rural housing will only exacerbate commuting.	2) It is considered that Employment Policy 3 makes allowance for the creation of appropriate new employment uses in rural areas which can contribute to a reduction in the need to travel.	2) Noted. No change.
109.2 Mr I Brown	Concern is expressed at the lack of employment opportunities in the Turriff area.	3) Many industrial estates in rural settlements lie virtually empty.	3) The availability of land offers the opportunity for businesses to locate and provide employment in rural areas. Revisions to Employment Policy 1 of the structure plan, however put the onus on local plans to critically examine sites that stand little chance of development and allocate these sites for suitable alternative uses or de-zone them.	3) Employment Policy 1 has been amended to include reference to sites that stand little chance of development.
117.1 Mr W Thomson	Concern is expressed at the lack of employment opportunities in the Turriff area, and the concomitant need to commute. It is felt that additional housing would exacerbate this situation.			
140.2 Mr K Newton, Formartine Partnership	With regard to the North East Scotland Economic Development Partnership and delivery or marketable sites: Should the Plan not identify sites in the rural as well as the major urban areas and set target acreage for these sites as a whole, as this would be in line with the stated aim in 2.2.3 of providing employment opportunities close to where people live?			
140.13 Mr K Newton, Formartine Partnership	The Report should emphasise the disadvantaged situation of some rural households.			
140.14 Mr K Newton, Formartine Partnership	Employment policies were written by people who are working and identified with the fairly hot-house atmosphere of Aberdeen and its main travel to work area, which tends to obscure the real problems that exist outwith these area.			
140.28 Mr K Newton, Formartine Partnership	The Report does not mention the impact of high fuel costs for people who have little option but to travel by car to shop and for their social life.			

Source	Summary of Comments	Summary of Points	Analysis	Action
140.29 Mr K Newton, Formartine Partnership	The Introduction to the Report points out that parts of the North-east have received funding from the EU structural funds in an attempt to "reduce social and economic disparities between other regions of the EC". Perhaps the plan should be identifying a need for the extension of the Objective 2 area to other rural areas in the North-east, which undoubtedly suffer "social and economic disparities" when compared with the general Aberdeen area.			

Source	Summary of Comments	Summary of Points	Analysis	Action
7.1 Mr C Campbell, Montagu Evans, Orange Personal Communication Services Limited	Experience elsewhere in Scotland, England and Wales suggests that it is helpful to Planning Authorities and Telecommunications Operators to consider the merits of any particular proposal in Planning terms having regard to a number of criteria. An extract from the Lothian Structure plan is enclosed as a suggested Policy wording.	1) The importance of a strategic telecommunications infrastructure to the economy and the need to highlight this in the Structure Plan in a positive manner should be referred to in the Plan.	1) It is accepted that telecommunications and ICT (Information Communication Technology) is an area that is growing in importance and is vital to the needs of business. ICT can be of particular benefit in helping create jobs in rural locations. More reference requires to be made to telecommunications in the Structure Plan.	1) Section in Working in the North East Chapter has been included promoting positive aspects of telecommunications/ICT.
123.9 Ms A Harvie, Aberdeen Chamber of Commerce	No mention is made of the importance of strategic telecommunications infrastructure to support (and maintain) development. (It is understood that NPPG1 does not require this facet to be included in Structure Plans and also recognised that small antennae for mobile telephone networks do not generally require planning consent). E-based business and home working may well be suitable for employment in remote locations but will not be attractive without major investment in bandwidth in both city and rural areas. This issue must be addressed positively by a land-use plan since it will be high on the shopping list for any potential inward investor, and proactive planning and support for city and town centre communications networks (e.g. the fibre optic network within Aberdeen) will determine the continued attractiveness (or not) of the existing built environment as business accommodation.	2) It is considered helpful for telecommunications and the re-use/redevelopment of established utility sites to be covered by a Structure Plan Policy.	2) It is agreed that a general policy covering the strategic importance of telecommunications be included in the plan, it is considered that detailed locational criteria and disposal of surplus utility sites would be better dealt with in local plans. This is a view supported by the new Draft NPPG: Radio Telecommunications (published November 2000) which states that telecommunications development is unlikely to raise strategic locational or land use issues which must be addressed in structure plans.	2) General policy on telecommunications has been included in Working in the North East Chapter.
172.3 Ms V Eadie, Chapman Warren, British Telecommunications Plc	This paragraph states that it is recognised that some proposals require a specific location for operational reasons. The objector requests that telecommunications development be included on the list of proposals requiring specific locations.			

Source	Summary of Comments	Summary of Points	Analysis	Action
<p>172.6 Ms V Eadie, Chapman Warren, British Telecommunications Plc</p>	<p>BT would welcome the introduction of a general forward planning policy to allow the appropriate re-use and/or redevelopment of established utility sites in accordance with National Policies. The following policy is submitted for inclusion in the Structure Plan: Policy: Established Utility Sites In circumstances where established utilities and their associated land holding are no longer required for their original purpose, the Council will positively consider change of use or new development proposals in light of other development plan policies and the surrounding land uses. Justification: A range of essential services are provided with the Plan area such as energy, telecommunications, water supply and sewerage. Often these are in specialised buildings, eg telephone exchanges, and protected by wayleaves which safeguard tracts of land from encroaching development. The Council recognises however that advances in technology and new practices in resource management often result in the original land requirements becoming surplus to requirements. The Structure Plan acknowledges that such circumstances could arise where the operational demands on such land and buildings become surplus. Policy (EUS) takes account of this scenario. The Council also recognise that changes in operational requirements should not reduce service provision or potential investment in respect of essential providers. Accordingly, the following recommendation is put forward to service providers: Recommendation EUS: The Council recommends that providers of essential utilities continue to invest in infrastructure improvements with a view to improving service provision, having regard to the environmental consequences of such developments.</p>			

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44.34 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Support Employment Land Policy Four.	1) The identification of tourism as a major potential contributor to economic growth is welcomed. Also welcomed is support for recreation and tourism developments related to natural heritage. The impact of tourism on the environment needs to be considered and a positive statement made in support of the development of sustainable tourism.	1) It is agreed that emphasis should be placed on the maintenance and enhancement of the North East's natural resources, which are a major factor in attracting tourists to the area. Reference to this should be made in the text of the Working in the North East Chapter.	1) Text of the Working in the North East Chapter has been amended.
63.3 Ms E Parkes, NE Local Biodiversity Action Plan	The policy states that tourism developments should be encouraged 'where they can be accommodated in an environmentally sensitive and sustainable way'. The policy also recognises the 'contribution of mountains, lochs, coastline, wildlife' to tourism. Suggested Addition to policy: "The policy recognises the importance of environment and biodiversity to tourism. " A positive statement in support of the development of sustainable tourism would greatly strengthen this policy and encourage integration of biodiversity conservation with tourism development. Guidelines for sustainable tourism in the North East are currently being explored by Scottish Enterprise Grampian.	2) It is considered that Employment Land Policy 4 needs to read more positively in favour of high quality tourist development and that the potential for "green" tourism should be explored, especially for providing footpaths.	2) The reference to green tourism is covered in the reply to point 1), though Employment Policy 4 should be amended to relect the need to safeguard and enhance the built and natural environment. It is expected that all tourist developments will be of a high quality.	2) Employment Policy 4 has been amended. 3) Refer these comments to the Aberdeen and Grampian Tourist Board and NESEDP.
73.4 Mr D Scott, Halliday Fraser Munro	Supports is expressed for the Council's encouragement of 'Tourism and Related Developments' but would appreciate the incorporation of a definition of such developments in the Structure Plan Glossary.	3) It is considered that greater effort should be channelled into encouraging tourism outside the main tourist areas of the North East. Consideration should also be given to setting up a museum of granite in Aberdeen and to making better use of vacant offices to improve the City's image.	3) These are matters that are more appropriately dealt with by other bodies, including the Aberdeen and Grampian Tourist Board and NESEDP.	4) Text of the Working in the North East Chapter has been amended.
75.4 Ms M Bochel, The Highland Council	The Highland Council would welcome support for recreation and tourism developments related to the natural heritage, provided that this is compatible with the conservation of the resource itself. This would help in the positive social and economic development of areas such as the Cairngorms.	4) Several detailed points were raised asking that changes be made to the text of the Plan.	4) It is agreed that various changes be made to clarify the text relating to tourism in the Working in the North East Chapter.	5) Refer these comments to the Aberdeen and Grampian Tourist Board and the appropriate Department of Aberdeenshire Council.
123.10 Ms A Harvie, Aberdeen Chamber of Commerce	The identification of tourism as a major potential contributor to economic growth in the region is agreed. However it is not clear why tourism should feature in the Structure Plan and not some other aspects of economic activity. Tourism is so important to NE Scotland that it merits a dedicated plan, with the transport, land use and environmental implications then being included in the Structure Plan.	5) There is a need for more tourist noticeboards. Concern is also expressed about the closure of toilets at Collieston.	5) These are not structure plan matters and should be passed on for the appropriate bodies to deal with.	
123.11 Ms A Harvie, Aberdeen Chamber of Commerce	The tourism policy statement "Employment Land 4" needs to read more positively in favour of high value adding, high quality tourism development.			

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123.29 Ms A Harvie, Aberdeen Chamber of Commerce	It is surprising that golf was not included in the list of pursuits in Paragraph 2.5.1, given the present Scottish Executive interest in promoting the sport. Aberdeen City has two of the top 40 courses in the UK (Royal Aberdeen and Murcar) and there is a large and historic golfing infrastructure across the region, which is an asset to regional tourism.			
140.5 Mr K Newton, Formartine Partnership	The first sentence of paragraph 2.5.1 should have a vital addition - "development of the short-stay holiday and weekend break market".			
140.27 Mr K Newton, Formartine Partnership	Perhaps there should be another priority identified - "greater effort channelled into opening up and encouraging tourism and tourism development outside the main tourist areas of the North-east, to diversify the benefits and relieve pressure on the main areas. One method of doing this would be to highlight possible opt-out digressions from the main castle and whisky trails. While tourism is to be encouraged, Aberdeenshire Council would need to appraise their current policy regarding facilities for visitors to the area and how the area looks without proper outdoor service maintenance.			
141.5 Ms R Rush, SEPA North Region	No reference is made to the impact of leisure travel on the environment, communities and infrastructure. Reference to Section 5 of the document would be beneficial.			
160.8 Ms V Munro Stevens	The potential for Green Tourism around Aberdeen has not been appreciated in terms of the potential for a long distance coastal footpath			
160.13 Ms V Munro Stevens	The potential for Green Tourism around Aberdeen has not been appreciated in terms of the potential for a North Deeside river footpath.			
160.14 Ms V Munro Stevens	The potential for Green Tourism around Aberdeen has not been appreciated in terms of the potential for better disabled access to riverside footpaths.			
160.15 Ms V Munro Stevens	Could EU funds be used to create a museum of granite and granite architecture in Aberdeen?			
160.16 Ms V Munro Stevens	There is a need for more tourist noticeboards.			

Source	Summary of Comments	Summary of Points	Analysis	Action
160.17 Ms V Munro Stevens	Is there any money for investment in tourism?			
160.18 Ms V Munro Stevens	Bridge of Dee is a national monument and its tourist potential has been affected by unsympathetic development.			
160.19 Ms V Munro Stevens	Better use should be made of vacant office space in Aberdeen to improve the City's tourist image.			
164.7 Dr R A MacDonald, Scottish Natural Heritage	The obvious importance of tourism is demonstrated by a section devoted to this topic. It states that tourism will be accepted provided all the criteria for sustainable development are adhered to. This should be the case for all developments, not just tourism.			
170.2 Mrs Sheehan, Collieston Amenities	The Council's action and the Council's rhetoric are in direct opposition. Tourism cannot and will not develop in the aftermath of the Council's decision to close the toilets at Collieston and their inability to assist with existing rural businesses development, ie the village shop.			

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44.28 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	More effort should be made for start-up and workshop businesses (small-scale).	It is felt that more reference should be made in the Plan to the potential importance of home/teleworking to the North East's economy, and that more effort should be made to support start-up and workshop businesses. One respondent requests that the last sentence of para 2.3.2 should be repeated in para 2.1.3.	The increasing importance of home/teleworking to the economy of the North East is recognised and particular reference should be made to that in the structure plan. Support for start-up and workshop businesses would be more appropriately dealt with through NESEDP.	Text of the Working in the North East Chapter has been amended.
44.29 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	The last sentence of this paragraph should be repeated in 2.1.3.			
44.61 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	The steady increase in working from home should be taken into account.			
149.9 Mr E Gillespie, Scottish Enterprise Grampian	The final sentence of paragraph 2.3.2 makes brief reference to the role of home working. Given the time span of the plan the objector would prefer to see more emphasis given to the role and potential opportunities arising from home working and the expanding availability and use of new technology. Over the next 15 years the potential for structural change in working practices is immense and must be addressed more fully in the Structure Plan.			