

Source	Summary of Comments	Summary of Points	Analysis	Action
12.1 Mrs S Joss, New Pitsligo Community Council	The plan concerns the area of Aberdeenshire closely environed to the city of Aberdeen, and is largely irrelevant to the Buchan area.	1)The general thrust of the plan in support of sustainability is well supported. However, it is perceived that the plan does not have a clear and unambiguous vision, strategy or view of what is meant by 'sustainability'. A number of suggestions are made on this and in particular to ensure some degree of clarity in priorities between the pursuit of economic growth and the consideration of social and environmental needs.	1) The points about lack of clarity in the vision, strategy and priority of aims in the plan are well made, and the criticism is accepted.	Strategy has been amended to give a clear statement of vision, aims and strategic land-use objectives. This includes defining :  * what the plan means by sustainability; * the relative priorities implied by that definition; * the particular roles that each part of the North East has to play; * how the policies in subsequent chapters relate back to the objectives, aims and vision to make a coherent whole; * how the activities following from the plan will be related to policies in other plans and strategies.  N.B. Some of the detail of these relationships will be set out in an Addendum to the Report of Survey, rather than in the Structure Plan itself.
14.1 Mr I McKessock, First Aberdeen	This is a very forward thinking document which bodes well for the future of the North East of Scotland.	2) On balance there is recognition that the plan needs to make provision for development to meet the need for further housing and employment. There are however a number of strongly expressed views on the overall emphasis of the document. Not unexpectedly opposing views are evident. There is clearly one body of opinion which believes that the strategy should be more promotional in terms of the North East's economy and identity and that more attention should be given to avoiding possible shortages in the supply of employment and housing land. These views nevertheless recognise the importance of 'sustainability'. Others however feel that the plan pays too little attention to quality of life and the natural environment. Another view is that the plan is fundamentally right in trying to meet immediate needs without detriment to those who follow, but that its limited scope for doing so should be acknowledged and not fudged.	2) The more detailed arguments about the balance to be struck between the various aims of the plan, and their relationship to sustainability, can only be resolved by clarifying the strategy, which will follow from point one above.	
21.2 Mr CR Hunneyball, Kemnay Community Council	The general strategy aimed at energy efficiency and reducing the need to commute is wholly endorsed.		3) Many of these comments can again only be resolved by clarifying the strategy, which will follow from point one above. However, in this case a useful extra input would be to clarify the particular role that each part of the North East has to play.	
23.3 Mr I Booth	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.		4) It is accepted that these links should be made clearer.	
24.3 Mr M D Duguid	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.		5) This is agreed, although ultimately the only demonstration of this will be through the monitoring of action that follows.	
25.3 Mr R P S Temple	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
30.3 Mr E C Pashley	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
32.3 Ms C Reeve	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
33.3 Mr T Reeve	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
34.3 Mrs S Reeve	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
37.3 Ms S Shortland	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
42.3 Mr R Pratt	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.	3) A number of comments have been		

Source	Summary of Comments	Summary of Points	Analysis	Action
44.7 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Draft NPPG1 (2000) states in Section 28 that "policies in a Structure Plan should promote the protection and enhancement of the built and natural environment" as one of the 4 aims of the long term VISION for any area. It is considered that this plan lacks VISION with respect to the topics of Nature Conservation and the Countryside.	received on the priorities between different locations, direction of growth, the balance between greenfield and brownfield, greenbelt, transport etc. Particular support is given to concentrating development on settlements with good services and public transport links. Those with an interest in the development industry have brought forward a variety of suggestions promoting allocations across the structure plan area but primarily in the Aberdeen Housing Market Area. These suggestions are covered in other sections of this schedule.		
44.27 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	Para 1.20, the text "and to the health and well-being of the people" should be added to "attractiveness and prosperity of the area".			
47.2 Mr. M Wanless, The Moray council	The finalised structure plan should contain a clear policy statement on strategy. While the overall strategy dovetails well with the Moray Structure Plan it should be expressed as a clear policy statement.			
54.1 Mr M Ford	The definition of sustainable economic growth offered in the second sentence of the last paragraph on page 5 of the Report of survey is inadequate. In particular, "sustainable economic growth" is an oxymoron. The word "sustainable" should be included and defined as per the Brundtland Report in the glossary of terms in the Written Statement.			
56.12 Mr P Dean	Insert reference to the well-being and quality of life of people. Economic growth is not paramount if people's way of life and happiness is adversely affected.			

Source	Summary of Comments	Summary of Points	Analysis	Action
63.1 Ms E Parkes, NE Local Biodiversity Action Plan	<p>The overall emphasis of the document, which sets 'sustainable economic growth' as a goal is not compatible with biodiversity conservation. Biodiversity is an integral component of sustainable development. So to allow an effective, linked consideration of biodiversity in the Structure Plan the key to the plan has to be sustainable development. Sustainable development and 'sustainable economic growth' are not the same thing. The pursuit of economic growth without an integrated consideration of social and environmental needs will not lead to protection of our biodiversity for future generations. Sustainable development has already been endorsed in the Aberdeen City Local Plan and the draft Aberdeenshire Local Plan. Considering that these documents, which should all be linked, have endorsed sustainable development, and it seems that sustainable development must also be the key strategy of the Structure plan.</p> <p>A clear keynote statement should be made to place sustainable development as the goal of the structure plan and allow for an effective integration of biodiversity conservation.</p>			
63.12 Ms E Parkes, NE Local Biodiversity Action Plan	<p><b>Linking Biodiversity Objectives</b></p> <p>The Structure Plan provides an opportunity to emphasise biodiversity's wide reaching character by including links between biodiversity objectives and other policies. This integrated approach is essential to support the successful implementation of the North East LBAP and the overall success of the biodiversity initiative. The draft document does not make these links.</p> <p>Biodiversity should not be considered as an isolated, unconnected issue referred to only in the section 'looking after the north east'. The comments provided on other sections of the plan (development, minerals, housing etc) should provide examples of specific links and ways to integrate biodiversity into these policies.</p> <p>In general the links between the sections of the document are not clear. Taking the aim of the strategy as sustainable development would bring the sections on community, environment and economics together and enable clear links.</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
66.1 Mr I Thompson	Does not agree with the opening statement that the Structure Plan Strategy is "to deliver sustainable economic growth". Whilst the rest of the Plan is much more balanced the opening statement sets the tone that economic growth is the overriding objective. The Structure Plan strategy should adopt the UK Sustainable Development Strategy to ensure a better quality of life for everyone, now and for future generations to come. Economic growth must be evenly balanced with social needs, prudent use of natural resources and environmental protection.			
68.3 The Occupier	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
70.1 Ms J Bryce, Scottish Wildlife Trust	The overall objective would better be described as enabling 'sustainable development' rather than just 'economic growth' (which is mentioned, but appears secondary). Sustainable development is a broader term. While it includes a presumption of economic growth, more importantly it also implies that it take account of factors other than economics, e.g. environmental, social, cultural. This term recurs on p26 4.1.1.			
80.1 M H D Pickford, AEF Access Group	Structure Plan found to be economy biased with insufficient weight given to environment, human and access issues. Please make North East better for tourism and residents. Village community life looks threatened, encourage 'traditional' houses, pedestrianisation, networks and recreation. Develop non-motorised access around/between communities. Re-read 'Countryside Access Strategy' and consider access legislation - these have a fundamental effect on the future. Key diagram really only shows housing/business activity.			

Source	Summary of Comments	Summary of Points	Analysis	Action
88.1 Mr A Ferguson, North East of Scotland Biological Record Centre	There is insufficient emphasis upon environmental protection throughout the whole of the Structure Plan. For a region that claims to have some of the "wildest" and most scenic landscapes in the country, and uses these to attract tourism in all its forms, it might be wise if the NEST Structure Plan were to reflect the value of its environment. The plan puts emphasis upon the economy, disregarding the effect upon the environment. This bias must be rectified to reflect the incredible importance that the environment has on all things within the North East. The placement of this section "Looking after the North East" should be at the beginning of the plan.			
90.2 Mr D Evans	The general strategy aimed at energy efficiency and reducing the need to commute is wholly endorsed.			
92.3 Dr A A Dow	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
93.2 Prof R M Aspden	It is preferable to expand larger communities into small towns, than to develop small communities to the detriment of the quality of life.			
112.1 Mr P Clarke, Barton Willmore Partnership, The Countesswells Consortium	Plan is seriously deficient in a number of important matters in which it does not meet national planning guidelines and advice relating to structure plans.			

Source	Summary of Comments	Summary of Points	Analysis	Action
112.7 Mr P Clarke, Barton Willmore Partnership, The Countesswells Consortium	Guided growth to Aberdeen and its immediate area over the the longer term would provide the best opportunity to achieve a high quality environment which would meet sustainability considerations and would assist in protecting the environment in the smaller towns and villages. While there is scope for settlements such as Stonehaven, Portlethen, Blackburn, Westhill, Newtonhill, and Kintore to meet additional allowances in the post 2001 period, the environmental and infrastructural capacity of these settlements to accept continued substantial development is necessarily limited. The allocation of housing requirements at Westhill together with increased [ greenfield ] allowances for Aberdeen City, which could be accommodated at Kingswells and at Countesswells, would take account of available environmental and infrastructure capacity and market demand, and through contributions to its implementation would assist considerably in achieving strategic objectives for the Western Peripheral Route.			
113.1 Mr P Clarke, Barton Willmore Partnership, Stewart Milne Group	Plan is seriously deficient in a number of important matters in which it does not meet national planning guidelines and advice relating to structure plans.			
113.7 Mr P Clarke, Barton Willmore Partnership, Stewart Milne Group	Guided growth to Aberdeen and its immediate area with provision over the longer term of a new community at Banchory Devenick would provide the best opportunity to achieve a high quality environment which would meet sustainability considerations and would assist in protecting the environment in the smaller towns and villages at the same time as providing substantial contributions to infrastructure and community facilities, including the WPR.			
123.2 Ms A Harvie, Aberdeen Chamber of Commerce	The opening Paragraph 1.1 must be sharper and more inspirational. Suggests: "The strategy to deliver sustained economic growth aims to make the North East a premier location of choice for business activity and a highly desirable place to live. It will enable development that connects communities equitably, respect the local and global environment and improve accessibility. It will concentrate people and jobs within the heart of existing communities and give priority to mixed use regeneration."			

Source	Summary of Comments	Summary of Points	Analysis	Action
124.3 Ms A Newlands	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
133.3 Mr I McHathie	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
135.3 Mr I Scott	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
140.6 Mr K Newton, Formartine Partnership	The last bullet deals with the use of cars in rural areas, but fails to provide any solutions to the problems of public transport in these areas. The focusing of development away from rural areas may result in an associated loss of focus on some rural problems and shouldn't be seen as a 'get out' clause for these issues.			
142.1 Mr A Mackenzie	The area around Kirkton of Maryculter is extensively utilised by cyclists, walkers and horseriders because of its natural beauty, and will not benefit from the Plan's stated aim of promoting economic growth.			
142.2 Mr A Mackenzie	The policy of promoting economic growth as exemplified in the designation of a site suitable for ten houses at Kirkton of Maryculter would significantly increase traffic volumes in the area. This would be to the detriment of the area's rural ambience and Road Safety, given the area's typically rural roads configuration.			
150.1 Mrs L C Massie, Culter Community Council	Culter Community Council agrees with the strategies and policies set out in NEST and how they can be carried out. Our concerns lie mainly in their translation into local plans and their implementation so that all communities become or remain balanced, sustainable, vital and cohesive with all necessary services and facilities provided. These concerns are expanded on in our other comments.			

Source	Summary of Comments	Summary of Points	Analysis	Action
150.2 Mrs L C Massie, Culter Community Council	We accept that at some time in the future that some green belt may be needed for employment and housing development and the WPR. We are concerned that this is controlled and overseen better than can be done at present under the present Acts where developers appear to have all the power and muscle against local knowledge and community wishes. The need for a change of law and better controls could be mentioned somewhere in the document.			
156.1 Mr D Fairlie	Settlements in Aberdeenshire (Stonehaven, Banchory, Inverurie and Ellon) should be promoted for commerce and industry in preference to Aberdeen City. This comment applies also to clauses 1.11 and 1.16, where mention is made that Aberdeen City's role should be strengthened as an important regional centre. In order to reduce traffic congestion, people who live in the outlying towns should also work there.			
157.3 Mr K Cassidy	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
159.3 Mrs K H Cassidy	Development should be concentrated on settlements with good public transport links, local facilities, and employment opportunities.			
161.1 Mr A Finlayson, The Community Councils Forum of the City of Abn.	The plan must recognise must recognise there will be financial constraints and the policy objectives in it should be set accordingly, as unachievable policies will lead to disillusionment and will undermine the credibility of the plan.			
161.2 Mr A Finlayson, The Community Councils Forum of the City of Abn.	The plan must be robust enough to prevent its policies being negated by developers. The plan should be planning-led rather than developer-led.			
163.1 Mr C Howden, Transform Scotland	Objects to the strategy objective "to deliver sustainable growth" (1.1) that is contradicted by 2.4.3 which states "the central theme...is sustainable development". - Sustainable economic growth and sustainable development are not the same thing. Sustainable development should be the headline strategy for the Structure Plan.			

Source	Summary of Comments	Summary of Points	Analysis	Action
<p>164.1                      Dr R A MacDonald,                      Scottish Natural Heritage</p>	<p>It is recognised that the plan needs to make provision for development to meet the demand for further housing and employment. The extent and pattern of this development is crucial if it is to contribute positively not only to economic well being but also to environmental quality within the plan area. In this respect, our greatest concern relates to the overarching strategy. The plan strategy set out in the "Our Future" statement and paragraphs 1.1 to 1.3 appears to emphasise development that is economically sustainable, with environmental concerns a secondary issue. The development should be economically sustainable, but such development must also be environmentally sustainable. This view to be in line with Government guidance in NPPG 1 'The Planning System' (paragraphs 5-7).</p> <p>In order to achieve an increased emphasis on environmental sustainability, it is necessary to define what environmental sustainability means. The following definition is based on the SNH policy statement on sustainable development entitled "Sustainable Development and the Natural Heritage - The SNH Approach" (Policy Guidance note 93/1). This definition is also considered to be in line with that given in NPPG 1. "Development will be provided for to meet the economic and social needs of Aberdeenshire in a sustainable manner which does not compromise the ability of future generations to meet their own needs. In particular, development will be promoted that:</p> <ul style="list-style-type: none"> <li>- maintains and improves the quality of the natural heritage as a whole;</li> <li>- encourages the wise and sparing use of non-renewable resources;</li> <li>- encourages the use of renewable resources within their capacity for regeneration;</li> </ul> <p>In situations where development proposals are of great complexity, and the impacts upon the environment are uncertain, but likely to be significant, a precautionary approach will be adopted to permit assessment on the soundest possible basis before a final decision is made".</p> <p>In order to achieve sustainable development in line with the above definition we consider that any development must adhere to the principles of environmental sustainability if it is to be acceptable. These principles should then be applied to the analysis of the issues set</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
	<p>out in the sections entitled "What the Plan Means For the North East". They also need to underpin the Structure Plan's guidance on the various development types set out in the following chapters. As this is a fundamental concern, SNH would welcome the opportunity to discuss this with you further and in more detail.</p>			
<p>164.2                      Dr R A MacDonald,                      Scottish Natural Heritage</p>	<p>These paragraphs give a brief synopsis of the current economic situation with little mention of the part the environment plays in the North East. SNH wish the plan to give more explicit recognition to the environmental qualities and value of the plan area. This would provide a stronger basis for emphasising environmental concerns/objectives, and permit users of the plan to have a clearer idea of what characteristics are considered to be important. At present, the statements are emphasising development opportunities much more than environment, which could mask the council's sustainability objectives expressed in the previous sections.</p> <p>Most of the text could be summarised in a couple of short paragraphs, for example: 'The prosperity of the North East has been in the main due to the oil and gas industry. Benefits have been patchy, notably in the rural areas where there is a greater dependency on fishing and agriculture. The area now faces new challenges with the decline in the population and the number of jobs but with an increase in households.'</p> <p>Figures quoted could be located in a table.</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
164.3 Dr R A MacDonald, Scottish Natural Heritage	<p>Some key points could be distilled from the text of this section they are:</p> <ul style="list-style-type: none"> <li>- the strategy is to focus on the future development of the main settlements whilst supporting the economy, employment, housing, accessibility of all communities</li> <li>- the prime focus will be on Aberdeen as the key contributor to north east prosperity</li> <li>- the plan will ensure a supply of land (particular brown field sites but green field sites will be used) for employment and housing opportunities on appropriate sites in the main settlements</li> <li>- the promotion, protection and enhancement of the natural environment is critical and an integral element of the strategy</li> <li>- a key element is the development of an integrated transport system to include accessibility by car and public transport</li> <li>- the strategy provides the basis for local plans.</li> </ul> <p>Although integration is well demonstrated the impact that this will have on the natural heritage needs to be expanded in keeping with our recommended amendment to the over arching aim (set out in the cover letter).</p>			
166.1 Mr I S Francis, RSPB Scotland	<p>The RSPB are disappointed to see that Environmental Issues are not considered first within the plan. In order to ensure a full treatment of sustainable development, the environment section of the plan (Looking after the North East) should be placed first, to set the physical and natural resource background to the area. A full set of environmental protection policies should then be introduced to provide a framework against which to place development policies. Each subsequent chapter (Working, Living, Moving About the North East) should each begin with an over-arching cross-reference policy saying that all policies in the section will be assessed against the Environment Policies in the first section and that adverse change affecting critical environmental features will not be permitted. Such policy integration would make it very clear that the primary aim of the plan is to minimise environmental impact and increase sustainability. This approach has been adopted in the Aberdeenshire Local Plan, which the RSPB very much welcome, and it would be preferable (and consistent with the structure of the Local Plan) if the plan was restructured.</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
<p>166.3                      Mr I S Francis,                      RSPB Scotland</p>	<p>It is disappointing that so little emphasis is placed in this plan on the concept of sustainable development. This is in marked contrast the Aberdeenshire Local Plan. It seems appropriate that a strategic, over-arching document such as the Structure Plan Local should contain advanced strategic thinking about this complex issue. In the RSPB's view, therefore, this section should heavily emphasise the concept and introduce new ways of thinking about development within the Structure Plan area.</p> <p>The RSPB made extensive comments on this in relation to the 'Issues Paper', and repeat some of those comments now, since there remains time to consider this issue again.</p> <p>-Sustainable development                      -The production of new development plans at this late stage in the 1990s offers a great opportunity for a new approach, which really tackles the issue of sustainable development, which has often been merely a relatively insignificant passing reference in recent development plans. Recent thinking in the post-Rio era makes it clear that sectoral approaches such as "development versus environment" are out of date. The environment must be at the core of development plans, fully integrated into development policies. We are concerned that the plan should not place too much emphasis on economic development and lack the broader approach necessary to make progress with truly sustainable development. The RSPB consider that the plan could go much further than earlier plans towards the concept of promoting and testing the concept of sustainable development. The RSPB's suggestions as to how this could achieved, are given in their letter of representation.</p> <p>Environmental Appraisal of the Plan                      -The RSPB recommend that, as part of the development of the joint Structure Plan, an Environmental Appraisal of the plan is undertaken, to ensure that plan policies do not adversely affect the environment, and fit with sustainability objectives. The EA should be an iterative process, and the results used to modify the plan as it develops, rather than being simply an analysis at the end of the process which is not acted upon."</p> <p>The RSPB strongly recommend that these strategic issues are reconsidered and the plan amended</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
	accordingly.			
168.1 Mr&Mrs H & K Roche	Economic/environmental and amenity balance must be seen to give far more protection to existing settlements. Previous planning decisions have favoured development of housing at the expense of the character and charm of this area (which in itself is important for residents and visitors alike).			
172.5 Ms V Eadie, Chapman Warren, British Telecommunications Plc	We are generally supportive of the aims of the strategy primarily supporting the economic growth of the area and reducing the need to travel. We request that point 4 be amended to include the phrase 'through the promotion of a well developed telecommunications network' to advocate this type of development in principle as a key element of sustainable economic growth.			

Source	Summary of Comments	Summary of Points	Analysis	Action
13.7 Mr CR Hunneyball, Kemnay Community Council	Is all this development needed in view of the job losses in Aberdeenshire?	1) The 1999 Structure Plan Area Forecasts were the focus of many critical comments.	Many of the comments were of a highly technical nature and provided alternative scenarios as a basis for forecasting. The methodology used by Aberdeen City and Aberdeenshire Council Joint Forecasting Team has been tested over many years and proved a robust basis for policy development. They have been challenged through previous structure plans and appeals and in nearly every case have always been held up as good practice. It is important to remember that forecasts inform policy development - they are not in themselves, policy. Structure plans need to be based upon a consistent foundation and the Strategic Forecasts have provided such a foundation.	Continue to use the 1999 Structure Plan Area Forecasts as a basis for policy development. Written Statement has been amended to reflect a more proactive approach in policy direction.
72.2 Mr B Wallace, GVA Grimley, Invervale Ltd	Underestimate of the housing requirement in the Aberdeen Housing Market Area and in the Nest area as a whole arising from low economic and population forecasts. The Plan fails to provide for alternative scenarios other than of decline and consequently lacks flexibility and robustness.	2) The most strongly expressed theme from the development industry was that the structure plan relies too heavily on economic forecasts which suggest the area is losing jobs and population. In contrast there were those views from individuals and community groups who question whether there is need to allocate as much land for housing and employment land. Many question the forecasts suggesting that they "are flawed and unwarrantedly pessimistic", believing more optimistic indicators are available.		
74.2 Mrs R A Henderson, Cove and Altens Community	It is unclear whether the 16000 potential job losses is accounted for by the North Sea oil and gas sector and other indicators only, or whether the inevitable resulting loss of service jobs is also taken into account.			
110.2 Mr I Jessiman, Aberdeen Harbour Board	The forecast trends for employment are considered to be overly pessimistic. The forecasts need to be updated to take account of current market conditions.			
112.2 Mr P Clarke, Barton Willmore Partnership, The Countesswells Consortium	The Strategy is compromised by the fact that it is a response to strategic forecasts which are flawed, unwarrantedly pessimistic by comparison with previous strategic forecasts, have not been the subject of any formal justification, consultation or testing and for which contrasting, more optimistic indicators are available from other sources.	3) A number of comments have suggested that the plan fails to provide for alternative scenarios rather than the use of "single line forecasts". A restrictive policy based upon forecasts which are unduly pessimistic will have an adverse effect - inhibiting rather than encouraging economic growth.		
112.5 Mr P Clarke, Barton Willmore Partnership, The Countesswells Consortium	A restrictive policy based upon forecasts which are unduly pessimistic will have the adverse effect of inhibiting investment and development. The 1999 forecasts must be reconsidered and additional allowances provided in the Aberdeen Housing Market Area, both in response to the revised forecasts and to facilitate flexibility which is necessary to ensure the continuous provision of an adequate supply of effective housing land.	4) There is need to demonstrate a more positive and proactive approach and that the 'pitch' of the plan is reversed accordingly. In this way the plan should be more responsive and able to direct an increase in economic and development activity in the event of successful promotional activity.		
113.2 Mr P Clarke, Barton Willmore Partnership, Stewart Milne Group	The Strategy is compromised by the fact that it is a response to strategic forecasts which are flawed, unwarrantedly pessimistic by comparison with previous strategic forecasts, have not been the subject of any formal justification, consultation or testing and for which contrasting, more optimistic indicators are available from other sources.			

Source	Summary of Comments	Summary of Points	Analysis	Action
113.5 Mr P Clarke, Barton Willmore Partnership, Stewart Milne Group	<p>A restrictive policy based upon forecasts which are unduly pessimistic will have the adverse effect of inhibiting investment and development. The 1999 forecasts must be reconsidered and additional allowances provided in the Aberdeen Housing Market Area, both in response to the revised forecasts and to facilitate flexibility which is necessary to ensure the continuous provision of an adequate supply of effective housing land.</p> <p>A balanced strategy which combines guided growth at appropriate settlements with provision over the long term, for a planned new community, would be the best and most appropriate means of achieving strategic housing objectives and would assist in providing certainty in the provision of a continuing supply of effective housing land in the Aberdeen Housing Market Area over the long term.</p>			
123.4 Ms A Harvie, Aberdeen Chamber of Commerce	<p>This section must acknowledge a potential future "Success Scenario". Examples:</p> <ul style="list-style-type: none"> <li>- UK offshore oil and gas operations may decline long-term but Aberdeen would continue to consolidate as a world oil centre of excellence attracting a professional skill base, creating growing demand for exports and diversifying oil industry technology into other sectors.</li> <li>- The linkage between oil industry and service sector employment may be found to be weaker than forecast and increasing use of ICT boosts growth. Service and high technology employment is then attracted to the area by the provision of suitable and well-located serviced development land and high quality of life for employees.</li> </ul>			

Source	Summary of Comments	Summary of Points	Analysis	Action
<p>123.5                      Ms A Harvie,                      Aberdeen Chamber of Commerce</p>	<p>The use of single line forecasts in a plan of this kind is inadequate. Upside and downside scenarios must also be developed and sensitivity analysis carried out on each case.</p> <p>Very concerned by the use in the plan of a forecast of 16000 regional jobs being lost by 2016. This obviously impacts on population; housing and employment land forecasts and gives the whole Structure Plan a negative emphasis.</p> <p>Evidence given at the recent CALP enquiry was very striking and a major cause for concern that such different views of service sector employment 1998 – 2016 were forthcoming. Prof. Wood's evidence suggested that total employment in the Structure Plan area could be 20,000 - 28,000 higher than the Structure Plan forecast by 2016. Were this correct, it would require a fundamental positive shift in emphasis of the Structure Plan. The existence of a disparity on this scale makes it essential that the Wood evidence and any other available data is used as a thorough challenge to the forecast data used in the Structure Plan. This must be addressed as a top priority.</p> <p>There is a need to dispel any possible externally held perception of Aberdeen and NE Scotland as an area of high cost, poor infrastructure and aversion to development. The tone and "body language" of the Structure Plan and any similar strategic documents should be scrutinised to ensure a positive and upbeat image throughout.</p> <p>The Structure Plan needs to be distinctive and create a framework of confidence with appropriate infrastructure that will support existing businesses and attract inward investment.</p> <p>There should be a stronger linkage between prosperity and growth since the other factors have to be funded from that: e.g. "The key to a prosperous future for the North East of Scotland is sustained economic growth. This will enhance the social inclusivity and environmental well-being of our communities."</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
125.1 Mr B Wallace, GVA Grimley, Barratt Construction Ltd	The Strategic Forecasts are not accepted and it is believed the entire shape of the plan is constrained by the straight - jacketing effect of the 1999 Forecasts. It is requested that an Examination In Public be held into the Structure Plan following its submission to the Scottish Exec. to debate the validity of the 1999 Forecasts and other matters including housing land allocations.			
125.2 Mr B Wallace, GVA Grimley, Barratt Construction Ltd	The Plan fails to provide for a positive level of growth for North East Scotland and fails to identify measures designed to alleviate the supposed factors for decline which have regrettably influenced the Forecasts.			
125.3 Mr B Wallace, GVA Grimley, Barratt Construction Ltd	It is not accepted that there will be a fall in the number of North East jobs by 2016. There is a gross underestimate of the housing requirement in the Aberdeen Housing Market Area and indeed the NEST area as a whole arising from the unacceptably low economic and population forecasts. The Plan fails to provide for alternative scenarios other than of decline and consequently lacks flexibility and robustness.			
128.1 Mr S Harrison, Bruce & Partners, Scotia Homes Ltd	It is not realistic to start with the premise that employment levels will fall and the population will decline. This needs to be examined more closely as the rest of the Structure Plan seems to rely on this initial conclusion.			
130.3 Mr I Downie	The use of the flawed 1999 forecasts presents significant strategic problems. If the same rate of completions/ demand is maintained then the supply will be exhausted at the end of April 2002. NEST merely perpetuates until 2006 the substantial deficiencies identified in the effective housing land supply at the time of the 1997 forecasts.			
130.6 Mr I Downie	The implications of a population shift to Aberdeenshire are far reaching council tax base, pressure on educational facilities, congestion and commuting pressure. Forward planning should provide for growth and not adopt a negative or constrained posture.			

Source	Summary of Comments	Summary of Points	Analysis	Action
139.8 Ms E Farquharson-Black, Paull & Williamsons, Solicitors, Grampian Housebuilders Committee	The alternative forecasts put forward by Professor Wood increase the number of households by 6,886 over the period 1998 - 2016.			
149.1 Mr E Gillespie, Scottish Enterprise Grampian	<p>The strategic intent for the North East Scotland articulated in the consultative draft Structure Plan is consistent with the objectives of seeking continued economic development and prosperity balanced against wider social and environmental considerations - a long-term sustainable approach. In addition, this is also consistent with the aims expressed in the North East Scotland Economic Development Partnership Strategy. However, the Strategy is based upon strategic forecasts that demonstrate a significant downward trend from previous work in 1997. The Labour Market Analysis undertaken by (GEL) last year by and large corroborates the long-term view. The role and drivers of the service sector is a specific area that should be examined in further detail and the plan forecasts revised upwards as necessary. The objector does not dispute the overall conclusions of these forecasts, but the response of the draft Structure Plan does not convey a positive aspiration to reverse this anticipated trend and, as such, it is considered wholly unacceptable.</p> <p>The draft Structure Plan does not convey a positive response to a number of key issues which, when combined, have a profound effect upon the competitiveness of North East Scotland as a business location. A conservative and cautious approach of 'no real change' does little in the short-term to remove the perceived curtain of disincentive (i.e. land constraint and lack of choice, transport infrastructure deficiencies, waste management crisis, high cost of living, labour/skills shortage, etc.) which currently exists. What is required is a positive, proactive Structure Plan that respects its context and demonstrates the potential to actually address these issues. SE Grampian asks that the 'pitch' of the plan be revised accordingly.</p>			

Source	Summary of Comments	Summary of Points	Analysis	Action
149.2 Mr E Gillespie, Scottish Enterprise Grampian	The Strategic Forecasts referred to at paragraphs 1.7 and 1.8 appear to show a significant downward trend since the earlier forecasts of 1997. Whilst SE Grampian does not dispute the overall picture presented by the forecasts they are nonetheless disappointing and the Structure Plan should - but doesn't appear to take every opportunity to - reverse this trend. In doing so it should provide sufficient land across the North East and more particularly in the Aberdeen area, to accommodate business, industry, housing and associated facilities.			
152.1 Mr J W Findlay, Jenkins & Marr, Stewart Milne Homes Ltd.	The findings of the strategic forecasts are disputed (see GHBC submission) and concerned that the Structure Plan is not seeking to reverse the forecasts in a pro active manner. The Structure Plan should provide sufficient land across the North East and in particular the Aberdeen area to accommodate industry, housing and associated facilities.			
153.1 Mr J W Findlay, Jenkins & Marr, Wimpey Homes Holdings Ltd.	The findings of the strategic forecasts are disputed. It is felt that the Structure Plan is not seeking to reverse the forecasts in a pro active manner. The Structure Plan should provide sufficient land across the North East and in particular the Aberdeen area to accommodate industry, housing and associated facilities.			

Source	Summary of Comments	Summary of Points	Analysis	Action
141.61 Ms R Rush, SEPA North Region	It would be beneficial for this document to promote the use of development briefs as a facility for highlighting requirements that a development must address, such as infrastructure issues. The context for development briefs should be set by the structure plan. This would allow the requirements of the various agencies to be represented at an early stage in the development process and would be to everyone's advantage, not least of all the developer who would be presented with the requirements from the very beginning of the process.	The context for development briefs should be set by the structure plan.	The promotion, protection and enhancement of the natural, built and cultural environment is confirmed as a critical element of the strategy. The context for this will be set out and explained through the Core Strategic and Locational Objectives to be set out in the Strategy. The use of Development briefs whilst not specifically referred to are to be encouraged and can greatly assist the implementation process. Local plans are a more appropriate vehicle to identify and detail the use of development briefs.	Noted. This matter is more appropriately dealt with at a Local Plan level.

Source	Summary of Comments	Summary of Points	Analysis	Action
44.52 Ms A E Woodward, Aberdeenshire Branch Scottish Wildlife Trust	There is no recognition in the section of the role played by voluntary bodies such as SWT and RSPB in assisting the Planners in carrying out their duties. There should be a commitment made to involving such bodies in the planning system. The draft NPPG1 has numerous references to involving "the community" including such organisations.	Concerns are expressed about (a) the involvement of other bodies in the planning system and (b) the relationship between the structure plan and other initiatives being undertaken e.g. community planning and economic development.	The plan clearly states that the success of the plan is dependent not only on the actions of Aberdeen City and Aberdeenshire but also by many individuals, groups, agencies, etc. In seeking to achieve this working in partnership is seen as both an integral and essential. Focus Groups drawn from a wide spectrum of interests have been set up and have made a valuable contribution in helping to identify issues and to give direction to the emerging policies. It is the intention that these groups and other forums [NEHPA, NESDP] continue beyond the submission of the plan. These will form part of the monitoring and review process and will give useful feedback.	Sections covering Implementation and Monitoring and Review have been ammended to clarify the role and future involvement of other partners.
47.1 Mr. M Wanless, The Moray council	The draft plan generally consists of high level policy statements with the detailing of these policies being remitted to the appropriate local plan. It will therefore be essential for Moray Council to be further consulted during the development of the Aberdeenshire Local Plan.			
56.1 Mr P Dean	Partnership can only work if the community has a say (i.e. a voice) in the Plan. Feedback both ways should be encouraged.			
123.1 Ms A Harvie, Aberdeen Chamber of Commerce	It is not clear what the "broader community planning process" is (for Aberdeen City it is presumably the Aberdeen Community Plan). Is the Structure Plan to be read strictly as a land use plan or is it intended to have wider aspirations and motivational value to stimulate economic growth? At present it mixes the two purposes and fails to achieve either. It is considered most important that there is an over-arching strategic plan (based on the NESEDP Economic Framework) which sets clear aspirations for the region that will be seen as attractive by business and other institutions. Such a plan would be the appropriate vehicle for policy initiatives and for informing the strategies of other agencies, allowing the Structure Plan to focus on resource planning issues.			