

Draft Nigg Bay Development Framework
Summary of public consultation responses

Summary of key issues arising from public consultation events

Thursday 8 October 2015, 18:00-21:00, East Tullos Learning Centre (6 attendees)

<i>Key issue</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
1. Traffic impact – roads are at capacity and roads such as Victoria Road are not designed to cope with the current level of traffic.	<p>A Transport Assessment is required as part of the proposed harbour development, to be agreed with Council’s Roads Authority. The precise detail of the proposed new road layout and routes for access to the new harbour will be determined through the Transport Assessment as part of the consenting process for the harbour and during the masterplan for the Harbour.</p> <p>Page 33 of the Draft Framework states that “the HGV route to and from the new harbour will be from the south along the Coast Road so as to avoid increase in HGV traffic through Torry via Greyhope Road or St Fitticks Road” – supported through traffic management measures and road design the intention is for harbour traffic to be directed south and to avoid use of residential streets in Torry. Due to the operation requirements of the harbour, it is considered unlikely that traffic will travel between the existing and new harbour facilities.</p>	<p>Rewording text on page 33 of the Development Framework to provide clarity regarding the anticipated direction of traffic movement; levels of control (including idea of traffic management measures); infrastructure improvements and anticipated locations of upgrades. It is understood that details of traffic movements and upgrades are as yet to be confirmed, which will be determined alongside the Harbour Masterplan.</p>
2. Roads – what will the upgrades be and where?	<p>In line with, and through agreement of, the Transport Assessment road improvements will be required to accommodate new development.</p> <p>Rewording of text on page 33 of the Framework is required to</p>	<p>Rewording text on page 33 of the Development Framework to provide clarity regarding the anticipated direction of traffic movement; levels of control</p>

	offer clarity regarding locations where improvements and upgrades are anticipated to be.	(including idea of traffic management measures); infrastructure improvements and anticipated locations of upgrades. It is understood that details of traffic movements and upgrades are as yet to be confirmed, which will be determined alongside the Harbour Masterplan.
3. How would car parking be dealt with at the harbour? Large parts of Torry are currently unpermitted; to introduce any permitting would add a significant and unacceptable financial burden on residents.	ACC do not have any plans to introduce permits to the Torry neighbourhood. All increase in parking should be accommodated within the bounds of the harbour development proposal.	Outwith the scope of the Development Framework and therefore no change to the document is proposed.
4. The First Bus no.12 and Stagecoach no. 59 currently only go as far as to the northern end on St Fitticks Road. Would any of the bus routes be redirected to serve the new harbour?	Comment noted. The Framework should expand on the proposed public service routes connecting the city centre to the proposed harbour. An evaluation of the need is only likely to take place when the proposal is developed and operational and the road structure can accommodate an extension to current public transport routes.	Text to be added to the Development Framework outlining the opportunities for the harbour to be served by public transport services.
5. Potential for public access to breakwaters for recreational fishing.	Comment noted. It is ACC understanding that no public access to the breakwaters will be permitted for security reasons. However, the area outwith the harbour boundary should still be able to accommodate those who want to fish from the headlands and the harbour proposals should not compromise this free recreational activity.	Revised wording added to Development Framework (Nigg Bay Objective 3) confirming commitment that existing and/or affected core path(s)/routes around the Bay and adjacent headlands will be re-routed/extended and improved to satisfaction of ACC.

<p>6. Support for the proposal and can see the benefits to the economy.</p>	<p>Comments noted. The economic case for the proposal is adequately referenced in the Framework.</p>	<p>No amendment to Development Framework document is proposed, as the economic case for the proposal is adequately referenced in the Framework.</p>
<p>7. There are ashes scattered in the bay, this has not been taken into account with the proposals.</p>	<p>Concerns noted however this is an issue which cannot be directly addressed through the Development Framework. It is accepted that there is nothing in the Cremation Act 1930 to restrict people disposing of ashes; however, the Bay of Nigg is not an official memorial site. These concerns will be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility.</p> <p>This issue should be acknowledged in the Framework, and the potential for a formal memorial, perhaps linked with coastal viewing point, and in remembrance of those whose ashes have been scattered into the bay, should be explored during the Harbour masterplan process.</p>	<p>Concerns to be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility; reference added to the Framework acknowledging this concern and that potential memorial options will be discussed and progressed alongside the Harbour Masterplan.</p>
<p>8. Boundaries to the harbour will be very visible and restrict access to the bay, the proposed intentions of the boundary treatments, i.e. fences, is unclear.</p>	<p>Certain aspects of proposed harbour development, including boundary treatments and fencing, are consented for through the Harbour Revision Order process (Harbours Act 1964). As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part of the harbour proposal.</p>	<p>This issue is fundamental to successful integration of the harbour proposal, therefore an additional development and design principle added to page 40 under 'Environment' which specifically refers to landscape impact assessment, including mitigating impact of harbour structures, consideration of key views/vistas and boundary treatments should be added to</p>

		the Framework.
9. Cranes would be noisy and unsightly.	Certain aspects of proposed harbour development, including construction and use of cranes, are consented for through the Harbour Revision Order process (Harbours Act 1964). As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part of the harbour proposal.	No amendment to Development Framework document is proposed.
10. Extent of built harbour structures has not been communicated well in current imagery seen in the local press.	<p>Concerns noted. The current 3D visuals for the proposed harbour do not show an accurate representation of the built nature of the harbour. 3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part of the harbour proposal.</p>	3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed. The 3D visuals will most likely be removed, because at this stage and until the 'design and build' contract is approved, more accurate visuals cannot be produced.
11. Size of affected population is inaccurate; harbour proposal has focussed its attention on the actual bay, however the impact is far greater than this. Adequate community improvements have not been clearly identified in the Framework, what the community will get out of this in terms of compensation is very unclear.	Comment noted. Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal. A similar concern has been expressed by ACC in the statutory consultee response to Transport Scotland, on the Harbour Revision Order and Marine Licence applications.	Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal.

Saturday 10 October 2015, 10:00-13:00, Torry Library (12 attendees & 1 Councillor)		
<i>Key issue</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
12. What compensation is there for the people in Torry now a huge proportion of their green space will be taken away and built on.	<p>Comment noted. Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal.</p> <p>A similar concern has been expressed by ACC in the statutory consultee response to Transport Scotland, on the Harbour Revision Order and Marine Licence applications.</p>	Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal.
13. It's a done deal, consultation too late, and consultation wasn't focussed at affected residents.	<p>Comment noted. The principle of the new harbour facility is established in Scottish Planning Policy through the National Planning Framework 3 (NPF3) A Plan for Scotland: Ambition, Opportunity, Place – where the expansion of Aberdeen Harbour is identified as a National Development. National Planning Framework 3 was subject to its own consultation process which established the principle of harbour expansion as a 'national development'. Details of the consultation can be found here: http://www.gov.scot/Topics/Built-Environment/planning/National-Planning-Framework</p> <p>Aberdeen City and Shire Strategic Development Plan: Main Issues Report identifies Aberdeen as an area for expansion of deep-water berths. Alongside Peterhead Harbour, it is designated as the 'subsea cluster', recognising the importance of both harbours to serving the energy sector.</p>	National Planning Framework 3 was subject to its own consultation process which established the principle of harbour expansion as a 'national development'. No amendment to Development Framework document is proposed.

	<p>The Bay of Nigg site is identified in the Proposed Aberdeen Local Development Plan 2015 as Opportunity Site (OP62), “capable of accommodating Aberdeen Harbour expansion”. To support any development proposals for the site, a Development Framework/Masterplan is required – the Bay of Nigg Development Framework fulfils this requirement.</p> <p>Details of the consultation undertaken on the Draft Development Framework are contained in the associated Committee Report.</p>	
14. Timescales for the project is unclear in the Framework.	<p>Comment noted. Clarification will be sought and added to the Development Framework document, particularly regarding an understanding of the length of time construction would take. In addition, we will recommend to the applicant that further engagement and publicity is required throughout the project as it develops, ensuring continued public engagement and awareness, and forming part of the overall mitigation measures proposed.</p>	<p>The ‘development table’ on page 36 of the Draft Framework should be augmented to offer clear information regarding the length of time for key harbour construction phases and milestones.</p> <p>Advise applicant that further engagement and publicity of the project as it develops is essential.</p>
15. Used to work in Altens industrial estate and in favour of harbour.	<p>Comments noted.</p>	<p>No amendment to Development Framework document is proposed.</p>
16. Any kind of development is being dumped on Torry because it’s considered as a regeneration area, so the people won’t care.	<p>Comment noted, however, the principle of the new harbour facility is established in Scottish Planning Policy through the National Planning Framework 3 (NPF3) A Plan for Scotland: Ambition, Opportunity, Place – where the expansion of Aberdeen Harbour is identified as a National Development.</p> <p>Aberdeen City and Shire Strategic Development Plan: Main Issues Report identifies Aberdeen as an area for expansion of deep-water berths. Alongside Peterhead Harbour, it is designated as</p>	<p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as</p>

	<p>the 'subsea cluster', recognising the importance of both harbours to serving the energy sector.</p> <p>The Bay of Nigg site is identified in the Proposed Aberdeen Local Development Plan 2015 as Opportunity Site (OP62), "capable of accommodating Aberdeen Harbour expansion". To support any development proposals for the site, a Development Framework/Masterplan is required – the Bay of Nigg Development Framework fulfils this requirement.</p> <p>Clear intent will be sought from the applicant regarding what community benefits are proposed as part of the mitigation for the harbour proposal. A similar concern has been expressed by ACC in the statutory consultee response to Transport Scotland, on the Harbour Revision Order and Marine Licence applications.</p>	part of the proposal.
Wednesday 14th October 2015, 15:00-19:00, Torry Library (4 attendees)		
<i>Key issue</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
17. Misunderstanding of processes.	<p>Comment noted. It is accepted that the proposal for harbour expansion is a complex one and the different/overlapping consents and routes by which representations can be made was confusing.</p> <p>Details of the consultation undertaken on the Draft Development Framework are contained in the associated Committee Report. As part of this consultation exercise, an informative leaflet which explained the differences in the consenting processes for the harbour and how the public could submit comments to other processes was produced.</p> <p>Clarification will be sought and added to the Development</p>	<p>The 'development table' on page 36 of the Draft Framework should be augmented to offer clear information regarding the length of time for key harbour construction phases and milestones.</p> <p>Advise applicant that further engagement and publicity of the project as it develops is essential.</p>

	<p>Framework document, particularly regarding an understanding of the length of time construction would take. In addition, we will recommend to the applicant that further engagement and publicity is required throughout the project as it develops, ensuring continued public engagement and awareness, and forming part of the overall mitigation measures proposed.</p>	
<p>18. Access arrangements, access around the coast retained.</p>	<p>Core paths will be preserved and/or realigned where required, as per 'Public Space and Access' Objective 3 on page 39. However, public access to the shore line will be restricted to a degree, due to the nature of the proposed development for a harbour and associated security requirements.</p>	<p>Revised wording added to Development Framework (Nigg Bay Objective 3) confirming commitment that existing and/or affected core path(s)/routes around the Bay and adjacent headlands will be re-routed/extended and improved to satisfaction of ACC.</p>
<p>19. Uncertainty of uses and how the harbour will be used; especially regarding industrial impact on the bay and surrounding residents.</p>	<p>Comments noted. The range of proposed uses the new harbour intends to attract and support is outlined on page 25 of the Development Framework. Further detail will be developed alongside the Harbour Masterplan.</p>	<p>No amendment proposed.</p>
<p>20. Planning Aid for Scotland contact was recommended to the 'Bay of Nigg' campaign group.</p>	<p>Noted.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>21. Overused roads, will only get busier.</p>	<p>A Transport Assessment is required as part of the proposed harbour development, to be agreed with Council's Roads Authority and Transport Scotland. The precise detail of the proposed new road layout and routes for access to the new harbour will be determined through the Transport Assessment as part of the consenting process for the harbour and the masterplan for the Harbour, including cumulative impact.</p> <p>Page 33 of the Draft Framework states that "the HGV route to</p>	<p>Rewording text on page 33 of the Development Framework to provide clarity regarding the anticipated direction of traffic movement; levels of control (including idea of traffic management measures); infrastructure improvements and anticipated locations of</p>

	<p>and from the new harbour will be from the south along the Coast Road so as to avoid increase in HGV traffic through Torry via Greyhope Road or St Fitticks Road” – supported through traffic management measures and road design the intention is for harbour traffic to be directed south and to avoid use of residential streets in Torry. Due to the operation requirements of the harbour, it is considered unlikely that traffic will travel between the existing and new harbour facilities.</p>	<p>upgrades. It is understood that details of traffic movements and upgrades are as yet to be confirmed, which will be determined alongside the Harbour Masterplan.</p>
<p>22. Destruction of our landscape to make more oil money is a short sighted way to plan a City.</p>	<p>Comment noted, however, the principle of the new harbour facility is established in Scottish Planning Policy through the National Planning Framework 3 (NPF3) A Plan for Scotland: Ambition, Opportunity, Place – where the expansion of Aberdeen Harbour is identified as a National Development.</p> <p>Aberdeen City and Shire Strategic Development Plan: Main Issues Report identifies Aberdeen as an area for expansion of deep-water berths. Alongside Peterhead Harbour, it is designated as the ‘subsea cluster’, recognising the importance of both harbours to serving the energy sector.</p> <p>The Bay of Nigg site is identified in the Proposed Aberdeen Local Development Plan 2015 as Opportunity Site (OP62), “capable of accommodating Aberdeen Harbour expansion”. To support any development proposals for the site, a Development Framework/Masterplan is required – the Bay of Nigg Development Framework fulfils this requirement.</p>	<p>The Aberdeen Harbour Expansion Proposal, which forms part of the Development Framework is as a result of Aberdeen Harbour Board’s predicted growth rate over the next century and the proposal is responding to that predicted need and is established as a ‘nations development’ in National Planning Framework 3. No amendment to the Development Framework is proposed.</p>
<p>23. Taking away wetlands, golf course area and closing the Bay of Nigg route.</p>	<p>Core paths will be preserved and/or realigned where required, as per ‘Public Space and Access’ Objective 3 on page 39.</p> <p>Balnagask Golf Course is zoned as Greenbelt (NE2) and Green Space Network (NE1) in the Proposed Aberdeen Local Development Plan 2015. Any proposals beyond this timescale would be subject to assessment as part of future local</p>	<p>Revised wording added to Development Framework (Nigg Bay Objective 3) confirming commitment that existing and/or affected core path(s)/routes around the Bay and adjacent headlands will be</p>

	<p>development plan reviews. The Development Framework does not include proposals for the golf course area.</p> <p>Page 40 of the Development Framework includes development and design principles to minimise environmental impact, including that “proposals for development must minimise environmental impact through avoidance or mitigation” and “where impacts are anticipated, these should be assessed against the ability to secure compensatory measures.”</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation and management plan, and, a pollution protection plan for Eat Tullos Burn is required as part of the proposed harbour development.</p>	<p>re-routed/extended and improved to satisfaction of ACC.</p> <p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal.</p>
<p>24. Massive destruction of green space left in Torry, 20 years once oil is gone it will just be a pollution mess.</p>	<p>Comments noted. It is acknowledged that there will be changes to the bay as a result of the proposed harbour development; however, the delivery of a National Development will be unable to avoid some impact as there will inevitably be a change to the status quo. The remit of the Draft Development Framework is to guide the most appropriate forms of development surrounding the proposed new harbour and inform it’s interactions with surroundings. The Draft Development Framework includes policies to sensitively respond to historic sites in the local area. Beyond this, a Landscape and Visual Impact Assessment is an integral part of the Environmental Statement (Environmental Impact Assessment). This will be assessed alongside the 3 separate consenting processes, (1) Harbour Revision Order; (2) Marine Licence; and (3) Planning Permission in Principle.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have requested a visualisation scheme is submitted as part of the harbour proposal, which includes suitable 3D modelling and cross-sectional analysis to adequately</p>	<p>3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed. The 3D visuals will most likely be removed, because at this stage and until the ‘design and build’ contract is approved, more accurate visuals cannot be produced.</p>

<p>25. Why not the marina idea? Least tourism stood a chance.</p>	<p>assess impact on landscape.</p> <p>The principle for Aberdeen harbour expansion, which is part of the Development Framework, is identified in national and local policy.</p> <p>The principle of the new harbour facility is established in Scottish Planning Policy through the National Planning Framework 3 (NPF3) A Plan for Scotland: Ambition, Opportunity, Place – where the expansion of Aberdeen Harbour is identified as a National Development.</p> <p>Aberdeen City and Shire Strategic Development Plan: Main Issues Report identifies Aberdeen as an area for expansion of deep-water berths. Alongside Peterhead Harbour, it is designated as the ‘subsea cluster’, recognising the importance of both harbours to serving the energy sector.</p> <p>The Bay of Nigg site is identified in the Proposed Aberdeen Local Development Plan 2015 as Opportunity Site (OP62), “capable of accommodating Aberdeen Harbour expansion”. To support any development proposals for the site, a Development Framework/Masterplan is required – the Bay of Nigg Development Framework fulfils this requirement.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>26. People in Torry get treated like second class citizens.</p>	<p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal, which work with the local community and the Council’s regeneration strategies.</p>	<p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as</p>

		part of the proposal.
27. Current harbour coped with oil boom at its height – why the need for more space now oil traffic will only decrease?	The principle for Aberdeen harbour expansion, which is part of the Development Framework, is identified in National and Local Policy.	No amendment to Development Framework document is proposed.
28. At least some public access to shore-line should be ensured. This plan would mean end of one of city's few remaining wild areas.	<p>Core paths will be preserved and/or realigned where required, as per 'Public Space and Access' Objective 3 on page 39. However, public access to the shore line will be restricted to a degree, due to the nature of the proposed development for a harbour and associated security requirements.</p> <p>Certain aspects of proposed harbour development, including boundary treatments and fencing, are consented for through the Harbour Revision Order process (Harbours Act 1964). As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part of the harbour proposal.</p>	Revised wording added to Development Framework (Nigg Bay Objective 3) confirming commitment that existing and/or affected core path(s)/routes around the Bay and adjacent headlands will be re-routed/extended and improved to satisfaction of ACC.
Formal representations received from members of the public (via email and letter)		
1. Mr William C Smith See Appendix 3 for record of full representation		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
a. Presence of wading birds on gravel beach, if part to be developed assurance should be made that works affecting breeding sites be done out of breeding seasons.	The detail of harbour construction will be dealt with under 3 separate consenting processes, (1) Harbour Revision Order; (2) Marine Licence; and (3) Planning Permission in Principle. Controls such as when development occurs will be managed by a Construction and Environmental Management Plan (CEMP).	Clarification required from the design consultants regarding proposed construction timings and the interaction with breeding seasons, to be

	Clarification will be sought from the design consultants regarding proposed construction timings and the interaction with breeding seasons, to be outlined in the forthcoming Harbour Masterplan and upon approval of the 'design and build' contract for harbour construction.	outlined in the forthcoming Harbour Masterplan.
b. Advised that lorry traffic would be directed away from streets of Torry and directed to south of Bay of Nigg; what assurances that this policy can be enforced.	Comments noted. Yes this is the intention, to be supported through traffic management measures and road design. The precise detail of the road layout and routes will be determined through a full Transport Assessment as part of the consenting process for the harbour and during the masterplan for the Harbour. Page 33 of the Draft Framework states that "the HGV route to and from the new harbour will be from the south along the Coast Road so as to avoid increase in HGV traffic through Torry via Greyhope Road or St Fitticks Road".	<p>Outcome of traffic management measures and detailed road design to be agreed through Transport Assessment, the forthcoming Harbour Masterplan and planning application(s).</p> <p>Rewording text on page 33 of the Development Framework to provide clarity regarding the anticipated direction of traffic movement; levels of control (including idea of traffic management measures); infrastructure improvements and anticipated locations of upgrades. It is understood that details of traffic movements and upgrades are as yet to be confirmed, which will be determined alongside the Harbour Masterplan.</p>
c. Assumed sewage waste no longer pumped out to sea via Aberdeen Long Sea Outfall? Is this facility now redundant?	This level of detail is beyond the scope of a planning document and the purposes of the Draft Development Framework, however, this information will be passed onto the applicant's (Aberdeen Harbour Board) environmental consultants.	Pass information onto the applicant's (Aberdeen Harbour Board) environmental consultants for consideration

		alongside detail harbour construction design.
d. Would like assurances development won't encroach on Balnagask golf course and for foreseeable future.	Balnagask Golf Course is zoned as Greenbelt (NE2) and Green Space Network (NE1) in the Proposed Aberdeen Local Development Plan 2015. Any proposals beyond this timescale would be subject to assessment as part of future local development plan reviews.	No amendment to Development Framework document is proposed.
2. Ms. Colette Snelling See Appendix 3 for record of full representation		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
a. Stay in Torry and object to the proposed Draft Bay of Nigg Development Framework.	Comments noted. The Draft Bay of Nigg Development Framework has been produced to help guide the most appropriate forms of development and to maximise potential surrounding the proposed new harbour at Bay of Nigg. The site for the proposed new harbour has been identified as a National Development, in Scottish Government's National Planning Framework 3. It has subsequently been identified in both the Aberdeen City and Shire Strategic Development Plan: Main Issues Report and in the Proposed Aberdeen Local Development Plan 2015 – therefore the principle for the harbour in planning policy terms has already been established. The Draft Bay of Nigg Development Framework sites within this establish planning policy framework.	No amendment to Development Framework document is proposed.
b. The current roads in Torry can't cope; there is gridlock at peak times, concerned about extra traffic generated by the construction and operation of these new facilities; will have huge impact on people of Torry, HGVs using residential streets as "rat runs"; declining air quality and increased noise vibration.	Comments noted. Page 33 of the Draft Framework states that "the HGV route to and from the new harbour will be from the south along the Coast Road so as to avoid increase in HGV traffic through Torry via Greyhope Road or St Fitticks Road" – supported through traffic management measures and road design the intention is for harbour traffic to be directed south and to avoid use of residential streets in Torry. Due to the operation requirements of the harbour, it is considered unlikely that traffic	Outcome of traffic management measures and detailed road design to be agreed through Transport Assessment, the forthcoming Harbour Masterplan and planning application(s).

	<p>will travel between the existing and new harbour facilities. The precise detail of the proposed new road layout and routes for access to the new harbour will be determined through a full Transport Assessment as part of the consenting process for the harbour and during the masterplan for the Harbour.</p>	<p>Rewording text on page 33 of the Development Framework to provide clarity regarding the anticipated direction of traffic movement; levels of control (including idea of traffic management measures); infrastructure improvements and anticipated locations of upgrades. It is understood that details of traffic movements and upgrades are as yet to be confirmed, which will be determined alongside the Harbour Masterplan.</p>
<p>c. Worried about the loss of so much green space which is valued by locals; Torry will be completely surrounded by industrial sites; significant impact on Torry residents.</p>	<p>Comment noted. A development of this nature will inevitably result in a loss of valued green/open space, with a subsequently unavoidable negative impact on the local community. As part of the consultation process on the Harbour Revision Order, ACC advised that further information regarding the extent of such an impact is required, including adequate assessment of its value and as such, clarification regarding community benefits as part of the mitigation is also required.</p> <p>Clarification will be sought from the applicant regarding what community benefits are proposed as part of the mitigation for the harbour proposal.</p>	<p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal.</p>
<p>d. Loss of wildlife, both marine and onshore. Dredging and blasting could drive dolphins away permanently. Could lose our new wetlands and valued habitats surrounding the bay. Rare plants in area could be negatively affected. Loss of green space. Increased traffic and noise during construction and operation,</p>	<p>Comments noted. The Development Framework document includes design and development principles to minimise environmental impact as far as possible through avoidance or mitigation. Detailed surveys and assessment of impact on specific species will be dealt with through the environmental impact assessment for the proposed harbour construction.</p>	<p>No amendment to Development Framework document is proposed.</p>

<p>will take several years which is unacceptable impact on residential populated area.</p>	<p>As part of the statutory consultation process on the Harbour Revision Order, ACC have advised that additional bird surveys and associated mitigation management plans are required as part of the assessment of this HRO application.</p>	
<p>e. Torry already has poor air quality (e.g. Wellington Road) and odour issues. Additional traffic and industrial activity is likely to add significantly to this. Poor air quality has been shown to have a negative impact on human health.</p>	<p>Air quality issues related to the physical construction and operation of the harbour are regulated by Environmental Health, who have been key in formulating ACC's statutory consultation response on the Harbour Revision Order application. The environmental report, as part of the HRO process, outlines proposed steps taken to address air quality on and out-with the harbour site, ensuring that dust nuisance and emissions can be suitably controlled and suppressed during the construction and operational phases of the development.</p> <p>The Development Framework includes a development and design principle (page 38; Land Use; Objective 2) to "sensitively manage the interaction between existing communities, businesses and industry" and "particular regard should be given to issues of noise, vibration, air quality, odour and light." These principles will apply to the Framework area.</p>	<p>This is a key aspect for the harbour expansion proposal, the detailed assessment of which is out with the scope of the development framework. No amendment to Development Framework document is proposed, given design and development principles in the Framework outline these considerations.</p>
<p>f. Increased light levels could have a detrimental effect on local wildlife and bird life as well as jeopardising views of the night sky.</p>	<p>Light pollution issues are considered within the context of an Environmental Impact Assessment for the proposed harbour construction. Page 38 of the Framework document includes a development and design principle (Land Use; Objective 2) which outlines development should "sensitively manage the interaction between existing communities, businesses and industry", with "particular regard should be given to issues of noise, vibration, air quality, odour and light" and; on page 40 the principle to "minimise environmental impact" with "particular regard should be given to: ...light pollution..., with suitable design response and/or mitigation measures put in place to reduce or offset any</p>	<p>No amendment to Development Framework document is proposed, however ACC have advised (as part of the HRO consultation process) that a light assessment to show the visual impact out-with daylight hours should be submitted for assessment and form part of the harbour application.</p>

	<p>adverse impact.” These principles will apply to the Framework area.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a light assessment to show the visual impact out-with daylight hours should be submitted for assessment and form part of the harbour application.</p>	
<p>g. For generations, people with Torry connections have scattered their loved ones’ ashes at the Bay of Nigg, they will be no longer able to do this and people will not be able to pay their respects in the place where ashes have been scattered previously.</p>	<p>Concerns noted however this is an issue which cannot be directly addressed through the Development Framework. It is accepted that there is nothing in the Cremation Act 1930 to restrict people disposing of ashes; however, the Bay of Nigg is not an official memorial site. These concerns will be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility.</p> <p>The potential for a formal memorial, perhaps linked with coastal viewing point, should be explored in acknowledgement of this concern and in remembrance of those whose ashes have been scattered into the bay.</p>	<p>Concerns to be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility; reference added to the Framework acknowledging this concern and that potential memorial options will be discussed and progressed alongside the Harbour Masterplan.</p>
<p>h. Unacceptable that development will change the view of the bay.</p>	<p>Comments noted. It is acknowledged that there will be changes to the bay as a result of the proposed harbour development, however, the delivery of a National Development will be unable to avoid some impact as there will inevitably be a change to the status quo. The remit of the Draft Development Framework is to guide the most appropriate forms of development surrounding the proposed new harbour and inform its interactions with surroundings. The Draft Development Framework includes policies to sensitively respond to historic sites in the local area. Beyond this, a Landscape and Visual Impact Assessment is an integral part of the Environmental Statement (Environmental Impact Assessment). This will be assessed alongside the 3 separate consenting processes, (1) Harbour Revision Order; (2)</p>	<p>3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed. The 3D visuals will most likely be removed, because at this stage and until the ‘design and build’ contract is approved, more accurate visuals cannot be produced.</p>

	<p>Marine Licence; and (3) Planning Permission in Principle.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have requested a visualisation scheme is submitted as part of the harbour proposal, which includes suitable 3D modelling and cross-sectional analysis to adequately assess impact on landscape.</p>	
i. Price of oil has decreased since project first muted, is project still financially viable?	The harbour expansion proposal forms part of the Bay of Nigg Development Framework. The new harbour is being proposed by Aberdeen Harbour Board, and a decision on whether the harbour is approved, including analysis of aspects of financial viability will be subject to decision-making processes through Transport Scotland and Scottish Government.	No amendment to Development Framework document is proposed.
3. Ms Lynn Thomson See Appendix 3 for record of full representation		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
a. As a resident of Torry, I wish to express my deepest concerns regarding the Draft Bay of Nigg Development Framework.	<p>Comment noted, however, the principle of the new harbour facility is established in Scottish Planning Policy through the National Planning Framework 3 (NPF3) A Plan for Scotland: Ambition, Opportunity, Place – where the expansion of Aberdeen Harbour is identified as a National Development.</p> <p>Aberdeen City and Shire Strategic Development Plan: Main Issues Report identifies Aberdeen as an area for expansion of deep-water berths. Alongside Peterhead Harbour, it is designated as the ‘subsea cluster’, recognising the importance of both harbours to serving the energy sector.</p> <p>The Bay of Nigg site is identified in the Proposed Aberdeen Local Development Plan 2015 as Opportunity Site (OP62), “capable of accommodating Aberdeen Harbour expansion”. To support any</p>	No amendment to Development Framework document is proposed.

	<p>development proposals for the site, a Development Framework/Masterplan is required – the Bay of Nigg Development Framework fulfils this requirement.</p>	
<p>b. Roads in Torry can't cope with existing traffic; there is gridlock at peak times; concerned about additional traffic generated by the construction and operation of these new facilities and the impact on Torry residents, including possibility that HGVs will use residential streets as "rat runs". Concerns regarding declining air quality and, increase of noise and vibrations from HGVs and traffic. Traffic proposed to be diverted through Altens onto congested Wellington Road and with all planned development it will exacerbate existing congestion.</p>	<p>Air quality issues related to the physical construction and operation of the harbour are regulated by Environmental Health, who has been key in formulating ACC's statutory consultation response on the Harbour Revision Order application. The environmental report as part of the HRO process outlines proposed steps taken to address air quality on and out-with the harbour site, ensuring that dust nuisance and emissions can be suitably controlled and suppressed during the construction and operational phases of the development.</p> <p>The Development Framework includes a development and design principle (page 38; Land Use; Objective 2) to "sensitively manage the interaction between existing communities, businesses and industry" and "particular regard should be given to issues of noise, vibration, air quality, odour and light." These principles will apply to the Framework area.</p> <p>A Transport Assessment is required as part of the proposed harbour development, to be agreed with Council's Roads Authority. The precise detail of the proposed new road layout and routes for access to the new harbour will be determined through the Transport Assessment as part of the consenting process for the harbour and during the masterplan for the Harbour.</p> <p>Page 33 of the Draft Framework states that "the HGV route to and from the new harbour will be from the south along the Coast Road so as to avoid increase in HGV traffic through Torry via Greyhope Road or St Fitticks Road" – supported through traffic management measures and road design the intention is for</p>	<p>Outcome of traffic management measures and detailed road design to be agreed through Transport Assessment, the forthcoming Harbour Masterplan and planning application(s).</p> <p>Rewording text on page 33 of the Development Framework to provide clarity regarding the anticipated direction of traffic movement; levels of control (including idea of traffic management measures); infrastructure improvements and anticipated locations of upgrades. It is understood that details of traffic movements and upgrades are as yet to be confirmed, which will be determined alongside the Harbour Masterplan.</p>

	<p>harbour traffic to be directed south and to avoid use of residential streets in Torry. Due to the operation requirements of the harbour, it is considered unlikely that traffic will travel between the existing and new harbour facilities.</p>	
<p>c. Natural environment – object to loss of open space which is valued by locals for leisure pursuits and fragmentation of natural habitat. Torry will be surrounded by industrial sites.</p>	<p>Comment noted. A development of this nature will inevitably result in a loss of valued green/open space, with a subsequently unavoidable negative impact on the local community. As part of the consultation process on the Harbour Revision Order, ACC advised that further information regarding the extent of such an impact is required, including adequate assessment of its value and as such, clarification regarding community benefits as part of the mitigation is also required.</p> <p>Clarification will be sought from the applicant regarding what community benefits are proposed as part of the mitigation for the harbour proposal.</p>	<p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal.</p>
<p>d. Loss of wildlife, both marine and onshore. Dredging and blasting in the Bay could drive dolphins away permanently. Dredging will last 19 months and the piling 23, Torry will have several years of noise disruption, before the construction of breakwaters and then operational noise of 24/7 harbour on our doorstep.</p>	<p>Comments noted. Assessment of issues regarding impact on wildlife and habitat loss will be dealt with through the environmental impact assessment process for the proposed harbour development. As part of the statutory consultation process on the Harbour Revision Order, ACC have advised that a number of additional surveys and assessment with regard to a piling management plan has also been advised is required.</p> <p>Page 40 of the Development Framework includes development and design principles to minimise environmental impact, including that “proposals for development must minimise environmental impact through avoidance or mitigation” and “where impacts are anticipated, these should be assessed against the ability to secure compensatory measures.”</p> <p>The Development Framework includes a development and design</p>	<p>No amendment to Development Framework document is proposed however ACC have advised (as part of the HRO consultation process) that additional noise surveys, including a piling management plan is required as part of the harbour expansion proposal.</p>

	<p>principle (page 38; Land Use; Objective 2) to “sensitively manage the interaction between existing communities, businesses and industry” and “particular regard should be given to issues of noise, vibration, air quality, odour and light.” These principles will apply to the Framework area.</p>	
<p>e. Bay of Nigg is one of the very few areas in Torry where you can escape from all man-made noise; the loss of this is significant for the area. Lose recently-created wetlands and surrounding habitat which is important for birds, including some rare species. Areas of recently planted trees could also be lost for ‘temporary’ construction sites.</p>	<p>Comments noted. The Development Framework document includes design and development principles to minimise environmental impact as far as possible through avoidance or mitigation, this includes avoiding disturbance to existing areas of woodland planting wherever possible. Detailed surveys and assessment of impact on specific species will be dealt with through the environmental impact assessment for the proposed harbour construction.</p> <p>As part of the statutory consultation process on the Harbour Revision Order, ACC have advised that additional bird surveys and associated mitigation management plans are required as part of the assessment of this HRO application.</p>	<p>No amendment to Development Framework document is proposed, however ACC have advised (as part of the HRO consultation process) that additional noise and bird surveys and associated mitigation management plans are required as part of the harbour expansion proposal.</p>
<p>f. Bay of Nigg is also home to three rare plants – the Oyster Plant, Sea Pea and Curved Sedge, which could negatively be affected.</p>	<p>Comments noted. Mention of these plant species is included in the Development Framework document alongside the principle to minimise environmental impact as far as possible through avoidance or mitigation. Detailed surveys and assessment of impact on specific species will be dealt with through the environmental impact assessment for the proposed harbour construction.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>g. Torry already has poor air quality and odour issues. Additional traffic and industrial activity will significantly add to this. Poor air quality has been shown to have a negative impact on human health. Torry already has some of the poorest life expectancy in Aberdeen – these developments can only exacerbate this. Increased light levels could have a</p>	<p>Air quality issues related to the physical construction and operation of the harbour are regulated by Environmental Health, who has been key in formulating ACC’s statutory consultation response on the Harbour Revision Order application. The environmental report as part of the HRO process outlines proposed steps taken to address air quality on and out-with the harbour site, ensuring that dust nuisance and emissions can be</p>	<p>This is a key aspect for the harbour expansion proposal, the detailed assessment of which is out with the scope of the development framework. No amendment to Development Framework</p>

<p>detrimental effect on local wildlife and views of the night sky and northern lights – the harbour will prevent this in future.</p>	<p>suitably controlled and suppressed during the construction and operational phases of the development.</p> <p>The Development Framework includes a development and design principle (page 38; Land Use; Objective 2) to “sensitively manage the interaction between existing communities, businesses and industry” and “particular regard should be given to issues of noise, vibration, air quality, odour and light.” These principles will apply to the Framework area.</p> <p>Light pollution issues are considered within the context of an Environmental Impact Assessment for the proposed harbour construction. Page 38 of the Framework document includes a development and design principle (Land Use; Objective 2) which outlines development should “sensitively manage the interaction between existing communities, businesses and industry”, with “particular regard should be given to issues of noise, vibration, air quality, odour and light” and; on page 40 the principle to “minimise environmental impact” with “particular regard should be given to: ...light pollution..., with suitable design response and/or mitigation measures put in place to reduce or offset any adverse impact.” These principles will apply to the Framework area.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a light assessment to show the visual impact out-with daylight hours should be submitted for assessment and form part of the harbour application.</p>	<p>document is proposed, given design and development principles in the Framework outline these considerations.</p>
<p>h. People with Torry connections have scattered their loved ones’ ashes at the Bay of Nigg. Will no longer be able to do this or pay respects to the area, especially with access restrictions and fencing proposed for the</p>	<p>Concerns noted however this is an issue which cannot be directly addressed through the Development Framework. It is accepted that there is nothing in the Cremation Act 1930 to restrict people disposing of ashes; however, the Bay of Nigg is not an official</p>	<p>Concerns to be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility;</p>

<p>harbour. View of natural bay will be lost.</p>	<p>memorial site. These concerns will be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility.</p> <p>The potential for a formal memorial, perhaps linked with coastal viewing point, should be explored in acknowledgement of this concern and in remembrance of those whose ashes have been scattered into the bay.</p>	<p>reference added to the Framework acknowledging this concern and that potential memorial options will be discussed and progressed alongside the Harbour Masterplan.</p>
<p>i. Significant impact on the settings of Girdleness Lighthouse and Old St Fittick's Church.</p>	<p>There is potential for detracting from the setting of designated and un-designated sites, and it is essential to adequately consider the effects on the historic environment. Page 39 of the Development Framework (Public Space and Access; Objective 1) outlines development should "protect and enhance existing heritage sites, and places of local importance; such as St Fitticks Church, Girdle Ness Lighthouse, Torry Coo etc." In addition, and as part of the consultation process on the Harbour Revision Order, ACC have advised that a mitigation plan is required as part of the harbour development, detailed the proposed measures to reduce the significant effects on the settings of St Fittick's church, Torry Battery and Girdleness Lighthouse.</p>	<p>Addition should be made to 'Objective 1 public space and access' for Bay of Nigg section in Framework which clearly identifies the key areas which will require detailed assessment regarding impact on historic assets and local places of importance.</p>
<p>j. Price of oil has declined dramatically and the harbour is quieter now, with market for supply ships slumping in recent months; question whether the harbour proposal is still financially viable? Inaccuracies in the claims about how many jobs will be created.</p>	<p>The harbour expansion proposal forms part of the Bay of Nigg Development Framework. The new harbour is being proposed by Aberdeen Harbour Board, and a decision on whether the harbour is approved, including analysis of aspects of financial viability will be subject to decision-making processes through Transport Scotland and Scottish Government.</p> <p>As part of the statutory consultation process on the Harbour Revision Order, ACC have advised that additional assessment is required to show effects on the local community, including employment and training initiatives.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>k. Dissatisfaction with the public engagement activities associated with the harbour development.</p>	<p>Comments noted. Details of the consultation undertaken on the Draft Development Framework document are contained in the</p>	<p>No amendment to Development Framework</p>

<p>Many people in Torry are still unaware of the Harbour Board's proposals and many who are aware think it's just for cruise ships (i.e. no supply boats, no cargo handling, no decommissioning etc).</p>	<p>associated Committee Report. This is considered to be an acceptable level for consultation on development frameworks, and went above that of statutory minimums.</p> <p>Other consultation exercises have been ran by the applicant in line with the statutory requirements for the relevant consenting processes.</p> <p>In addition, we will recommend to the applicant that further engagement and publicity is required throughout the project as it develops, ensuring continued public engagement and awareness, and forming part of the overall mitigation measures proposed.</p>	<p>document is proposed, however, ACC have advised to the applicant/design consultants that further engagement and publicity is required throughout the project as it develops, ensuring continued public engagement and awareness.</p>
<p>I. There should be a public debate with independent experts (i.e. not sub-contractors employed by the Harbour Board) giving an unbiased, objective view of the development.</p> <p>Images of new harbour are misleading and misrepresentative, do not show fencing, car parking, welfare blocks, quayside tanks and temporary construction sites which will engulf the historic Old St Fittick's Church.</p>	<p>Transport Scotland / Scottish Government are the decision-making authority for the proposed harbour expansion proposal, and their decision involves assessment of consultation responses from all relevant statutory agencies and organisations. This is managed through the consenting process for a Harbour Revision Order.</p> <p>The current 3D visuals for the proposed harbour do not show an accurate representation of the built nature of the harbour. 3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed.</p> <p>Certain aspects of proposed harbour development, including boundary treatments and fencing, are consented for through the Harbour Revision Order process (Harbours Act 1964).</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part</p>	<p>3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed. The 3D visuals will most likely be removed, because at this stage and until the 'design and build' contract is approved, more accurate visuals cannot be produced.</p>

	of the harbour proposal.	
4. Ms Betty Lyon See Appendix 3 for record of full representation		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
a. Resident of Torry and object to the proposed Draft Bay of Nigg Development Framework.	<p>Objection noted, however, the principle of the new harbour facility is established in Scottish Planning Policy through the National Planning Framework 3 (NPF3) A Plan for Scotland: Ambition, Opportunity, Place – where the expansion of Aberdeen Harbour is identified as a National Development.</p> <p>Aberdeen City and Shire Strategic Development Plan: Main Issues Report identifies Aberdeen as an area for expansion of deep-water berths. Alongside Peterhead Harbour, it is designated as the ‘subsea cluster’, recognising the importance of both harbours to serving the energy sector.</p> <p>The Bay of Nigg site is identified in the Proposed Aberdeen Local Development Plan 2015 as Opportunity Site (OP62), “capable of accommodating Aberdeen Harbour expansion”. To support any development proposals for the site, a Development Framework/Masterplan is required – the Bay of Nigg Development Framework fulfils this requirement.</p>	No amendment to Development Framework document is proposed.
b. Current infrastructure in Torry can’t cope with existing traffic; there is gridlock at peak times; concerned that additional traffic generated will have huge impact on people of Torry and HGVs will use residential streets as “rat runs”; air quality will decline and noise/vibrations will increase.	A Transport Assessment is required as part of the proposed harbour development, to be agreed with Council’s Roads Authority. The precise detail of the proposed new road layout and routes for access to the new harbour will be determined through the Transport Assessment as part of the consenting process for the harbour and during the masterplan for the Harbour.	Outcome of traffic management measures and detailed road design to be agreed through Transport Assessment, the forthcoming Harbour Masterplan and planning application(s).

	<p>Page 33 of the Draft Framework states that “the HGV route to and from the new harbour will be from the south along the Coast Road so as to avoid increase in HGV traffic through Torry via Greyhope Road or St Fitticks Road” – supported through traffic management measures and road design the intention is for harbour traffic to be directed south and to avoid use of residential streets in Torry. Due to the operation requirements of the harbour, it is considered unlikely that traffic will travel between the existing and new harbour facilities.</p> <p>Air quality issues related to the physical construction and operation of the harbour are regulated by Environmental Health, who has been key in formulating ACC’s statutory consultation response on the Harbour Revision Order application. The environmental report as part of the HRO process outlines proposed steps taken to address air quality on and out-with the harbour site, ensuring that dust nuisance and emissions can be suitably controlled and suppressed during the construction and operational phases of the development.</p> <p>The Development Framework includes a development and design principle (page 38; Land Use; Objective 2) to “sensitively manage the interaction between existing communities, businesses and industry” and “particular regard should be given to issues of noise, vibration, air quality, odour and light.” These principles will apply to the Framework area.</p>	<p>Rewording text on page 33 of the Development Framework to provide clarity regarding the anticipated direction of traffic movement; levels of control (including idea of traffic management measures); infrastructure improvements and anticipated locations of upgrades. It is understood that details of traffic movements and upgrades are as yet to be confirmed, which will be determined alongside the Harbour Masterplan.</p>
<p>c. Concern over loss of green space, Torry will be surrounded by industrialisation and pollution and will have huge impact on wildlife of the area (marine and onshore). Dredging and blasting will drive dolphins away permanently; will lose recently-created wetlands; and development will have detrimental</p>	<p>Comment noted. A development of this nature will inevitably result in a loss of valued green/open space, with a subsequently unavoidable negative impact on the local community. As part of the consultation process on the Harbour Revision Order, ACC advised that further information regarding the extent of such an impact is required, including adequate assessment of its value</p>	<p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of</p>

<p>impact on bird wildlife.</p>	<p>and as such, clarification regarding community benefits as part of the mitigation is also required.</p> <p>Further information and clarification should be added to the Development Framework regarding commitment to the need for community benefits, in the form of mitigation/compensatory measures, which are to be explored and established as part of the proposal.</p> <p>Assessment of issues regarding impact on wildlife and habitat loss will be dealt with through the environmental impact assessment process for the proposed harbour development. As part of the statutory consultation process on the Harbour Revision Order, ACC have advised that a number of additional surveys and assessment with regard to environmental impact concerns are required. In addition, a piling management plan has also been advised is required.</p>	<p>mitigation/compensatory measures, which are to be explored and established as part of the proposal.</p>
<p>d. View of Bay will be lost forever and replaced with high security fencing.</p>	<p>Comments noted. It is acknowledged that there will be changes to the bay as a result of the proposed harbour development, however, the delivery of a National Development will be unable to avoid some impact as there will inevitably be a change to the status quo. The remit of the Development Framework is to guide the most appropriate forms of development surrounding the proposed new harbour and inform its interactions with surroundings. The Development Framework includes policies to sensitively respond to historic sites in the local area. Beyond this, a Landscape and Visual Impact Assessment is an integral part of the Environmental Statement (Environmental Impact Assessment). This will be assessed alongside the 3 separate consenting processes, (1) Harbour Revision Order; (2) Marine Licence; and (3) Planning Permission in Principle.</p>	<p>This issue is fundamental to successful integration of the harbour proposal, therefore an additional development and design principle added to page 40 under 'Environment' which specifically refers to landscape impact assessment, including mitigating impact of harbour structures, consideration of key views/vistas and boundary treatments should be added to the Framework.</p>

	<p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised a visualisation scheme is submitted as part of the harbour proposal, which includes suitable 3D modelling and cross-sectional analysis to adequately assess impact on landscape. ACC have also advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part of the harbour proposal.</p>	
<p>e. Price of oil has decreased and the project is not financially viable now, does not make economic sense with no increase in oil price likely in the near future.</p>	<p>The harbour expansion proposal forms part of the Bay of Nigg Development Framework. The new harbour is being proposed by Aberdeen Harbour Board, and a decision on whether the harbour is approved, including analysis of aspects of financial viability will be subject to decision-making processes through Transport Scotland and Scottish Government.</p> <p>As part of the statutory consultation process on the Harbour Revision Order, ACC have advised that additional assessment is required to show effects on the local community, including employment and training initiatives.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>f. If these developments are given the go ahead, rare plants in the Bay will be lost.</p>	<p>Comments noted. Mention of these plant species is included in the Development Framework document alongside the principle to minimise environmental impact as far as possible through avoidance or mitigation. Detailed surveys and assessment of impact on specific species will be dealt with through the environmental impact assessment for the proposed harbour construction.</p>	<p>No amendment to Development Framework document is proposed. The rare plant species mentioned are already referenced in the Framework.</p>
<p>g. Dredging and blasting will take place for 18 months 24/7, the noise pollution is bad enough from the existing harbour.</p>	<p>Comments noted. Assessment of issues regarding noise impact of the harbour construction and operation will be dealt with through the environmental impact assessment process for the proposed harbour development. As part of the statutory consultation process on the Harbour Revision Order, ACC have advised that a number of additional surveys and assessment with regard to noise is required – including a piling management plan.</p>	<p>No amendment to Development Framework document is proposed, given that such considerations are covered by design and development principles within the Framework.</p>

	<p>Page 40 of the Development Framework includes development and design principles to minimise environmental impact, including that “proposals for development must minimise environmental impact through avoidance or mitigation” and “where impacts are anticipated, these should be assessed against the ability to secure compensatory measures.”</p> <p>The Development Framework includes a development and design principle (page 38; Land Use; Objective 2) to “sensitively manage the interaction between existing communities, businesses and industry” and “particular regard should be given to issues of noise, vibration, air quality, odour and light.” These principles will apply to the Framework area.</p>	
<p>h. Torry already has poor air quality and well-documented odour issues. Additional traffic and industrial activity is likely to add significantly to this. Poor air quality has been shown to have a negative impact on human health.</p>	<p>Air quality issues related to the physical construction and operation of the harbour are regulated by Environmental Health, who has been key in formulating ACC’s statutory consultation response on the Harbour Revision Order application. The environmental report as part of the HRO process outlines proposed steps taken to address air quality on and out-with the harbour site, ensuring that dust nuisance and emissions can be suitably controlled and suppressed during the construction and operational phases of the development.</p> <p>The Development Framework includes a development and design principle (page 38; Land Use; Objective 2) to “sensitively manage the interaction between existing communities, businesses and industry” and “particular regard should be given to issues of noise, vibration, air quality, odour and light.” These principles will apply to the Framework area.</p>	<p>This is a key aspect for the harbour expansion proposal, the detailed assessment of which is out with the scope of the development framework. No amendment to Development Framework document is proposed, given design and development principles in the Framework outline these considerations.</p>
<p>i. Increased light levels will have a detrimental effect on local wildlife and birdlife as well as jeopardizing</p>	<p>Light pollution issues are considered within the context of an Environmental Impact Assessment for the proposed harbour</p>	<p>No amendment to Development Framework</p>

views of the night sky.	<p>construction. Page 38 of the Framework document includes a development and design principle (Land Use; Objective 2) which outlines development should “sensitively manage the interaction between existing communities, businesses and industry”, with “particular regard should be given to issues of noise, vibration, air quality, odour and light” and; on page 40 the principle to “minimise environmental impact” with “particular regard should be given to: ...light pollution..., with suitable design response and/or mitigation measures put in place to reduce or offset any adverse impact.” These principles will apply to the Framework area.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a light assessment to show the visual impact out-with daylight hours should be submitted for assessment and form part of the harbour application.</p>	document is proposed, however ACC have advised (as part of the HRO consultation process) that a light assessment to show the visual impact out-with daylight hours should be submitted for assessment and form part of the harbour application.
j. People with Torry connections have scattered their loved ones’ ashes at the Bay of Nigg; will no longer be able to do this or pay their respects.	<p>Concerns noted however this is an issue which cannot be directly addressed through the Development Framework. It is accepted that there is nothing in the Cremation Act 1930 to restrict people disposing of ashes; however, the Bay of Nigg is not an official memorial site. These concerns will be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility.</p> <p>The potential for a formal memorial, perhaps linked with coastal viewing point, should be explored in acknowledgement of this concern and in remembrance of those whose ashes have been scattered into the bay.</p>	Concerns to be passed onto Aberdeen Harbour Board for consideration alongside the proposed harbour facility; reference added to the Framework acknowledging this concern and that potential memorial options will be discussed and progressed alongside the Harbour Masterplan.
Formal representations received from statutory consultees		
5. SEPA See Appendix 3 for record of full representation		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a result of</i>

		<i>Representation</i>
Further to the advice in our response of 12 June 2015 (PCS/140438) we note that the wording “however further flood risk assessment would be required to identify any risk of flooding across the area as a whole” has been added.	Comments noted.	No amendment to Development Framework document is necessary.
In regard to section 4 of our response the wording in the Landfill section on page 7 has been expanded to include some of the advice we provided.	Comments noted.	No amendment to Development Framework document is necessary.
We don’t have any further advice or comments at this stage. We can confirm we have received a copy of the Environmental Report through the SEA Gateway and will comment on this separately.	Comments noted. We look forward to receiving comments on the SEA: Environmental Report.	No amendment to Development Framework document is necessary.
6. Scottish Government / Historic Scotland See Appendix 3 for record of full representation		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
HES welcomes the preparation of this framework and in particular the on-going engagement with them as the proposals for the new harbour and surrounding area are developed.	Comments noted.	No amendment to Development Framework document is proposed.
HES understands that the framework sets the context for further detailed masterplans for the new harbour, Altens and East Tullos.	Comments noted.	No amendment to Development Framework document is proposed.
Welcomed that the challenges represented for the historic environment have been identified at this level, as has the importance of developing the area with these sensitivities in mind, including importance	Comments noted.	No amendment to Development Framework document is proposed.

<p>of lower-level masterplans to address issues in detail and to consider how best to mitigate impacts.</p>		
<p>Bay of Nigg – content with the findings of the assessment in relation to the Bay of Nigg area; potential for negative effects on designated and un-designated sites is noted against themes such as land-use, economy and infrastructure; particular sensitivity is the scheduled monument St Fittick’s Church. Therefore, the discourse relating to this specific issue is welcomed. Further work at the detailed stage will require to address this and offer suitable detailed mitigation.</p>	<p>Comments noted. There is clear potential for negative effects on designated and un-designated sites, and it is essential to adequately consider the effects on the historic environment. Page 39 of the Development Framework (Public Space and Access; Objective 1) outlines development should “protect and enhance existing heritage sites, and places of local importance; such as St Fitticks Church, Girdle Ness Lighthouse, Torry Coo etc.” In addition, and as part of the consultation process on the Harbour Revision Order, ACC have advised that a mitigation plan is required as part of the harbour development, detailed the proposed measures to reduce the significant effects on the settings of St Fittick’s church, Torry Battery and Girdleness Lighthouse.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>Altens – HES welcome the recognition of the potential effect development in this area could have on the scheduled cairns of Tullos Hill. Content to agree with this assessment of this issue at this level and note the mitigation discussed relating to green network identification for the Tullos Hill area and the protective use this could have for the site and setting of these monuments.</p>	<p>Comments noted.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>East Tullos – HES are content to agree with the findings of the assessment for this area, particularly in reference to the identification of potential negative effects on St Fittick’s Church from the suggested new link road. This issue will require to be considered in further detail and appropriate mitigation outlined.</p>	<p>Comments noted. As part of the consultation process on the Harbour Revision Order, ACC have advised that a mitigation plan is required as part of the harbour development, detailed the proposed measures to reduce the significant effects on the settings of St Fittick’s church, Torry Battery and Girdleness Lighthouse.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>Proposed Mitigation Measures</p>	<p>Comments noted.</p>	<p>No amendment to</p>

<p>It is noted that the mitigation stated for the predicted effects on the historic environment is generic in nature, relying on the delivery of other objectives of the framework. Given the balancing of the objectives in delivery it will be important the area-specific masterplans consider in further detail these effects and tailor mitigation for these.</p>		<p>Development Framework document is proposed.</p>
<p>7. Scottish Water See Appendix 3 for record of full representation</p>		
<p><i>Summary of Representation</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>Having previously commented on the Development Framework, as part of the stakeholder consultation process, we now have very few comments to make.</p>	<p>Comments noted.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>We advised that Nigg Waste Water Treatment Works had been referred to incorrectly as a “Water Treatment Plant”, we are happy that most of these incidents have been corrected, but have found that a couple still exist, on page 7; paragraph 2 and on the picture label on page 25.</p>	<p>Comments noted. References within the document to be amended on page 7; paragraph 2 and the label for the picture on page 25.</p>	<p>Amend references on pages 7 and 25 of the Development Framework document.</p>
<p>Environmental Report has been reviewed and we are pleased to see that a commitment has been made to offset the associated increase in water demand linked to this development through sustainable water use. In addition, there is an objective to reduce the impact of infrastructure upgrade works on local businesses and communities.</p> <p>Early engagement will be key to achieving this, especially for facilitating a water supply for the new</p>	<p>Comments noted. Scottish Water’s willingness to engage has been communicated to the design consultants for the harbour expansion project to ensure awareness of the importance of early engagement with Scottish Water when considering water infrastructure upgrades, offsetting associated increase in water demand and ensuring no negative impact on existing operations/infrastructure. Additional point added to Objective 6, Infrastructure and Access for Bay of Nigg Development and Design Principles, to state “early engagement with infrastructure operators is required”.</p>	<p>Additional point added to Objective 6, Infrastructure and Access for Bay of Nigg Development and Design Principles, to state “early engagement with infrastructure operators is required” (page 39 of Development Framework document).</p>

harbour and ensuring that there is no negative impact on our existing infrastructure during its development and operation.		
There is a reference in the Environmental Report to the Strategic Asset Capacity Development Plan (2009), which Scottish Water publishes annually. As this is an annual document it may be preferable to remove the reference to a specific year's edition. The document is reference on page 29 and page 231.	Comments noted. References to the year will be removed from the Environmental Report on pages 29 and 231.	Amend references to year date of the Strategic Asset Capacity Development Plan, on pages 29 and 231 of the Environmental Report (SEA).
We look forward to our continued involvement in the progress of the Bay of Nigg Development Framework and the production of the individual Masterplans for the area.	Comments noted.	No amendment to Development Framework document is proposed.
8. SNH See Appendix 3 for record of full representation		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
There should be a greater recognition of the value and use of existing open space and other green infrastructure.	Comments noted.	Reference and understanding of the value of use of existing space to be incorporated into the Framework document.
Clear mention of the way in which the Scottish Government's Guidance on Design and Placemaking has been utilised in the preparation of the Framework.	Comments noted.	Reference to this aspect to be incorporated into the Development Framework document.
Recognition that this development framework has a longer timescale than the Local Development Plan (LDP), of which it is part. For example, the proposal for a possible new road across St Fitticks Park, was	Comments noted. Any potential new road link into East Tullos should be assessed in the future, alongside an evaluation of need and demand for any new routes required to service the demands of the harbour and associated industrial/business land – to be	The relevant graphics and text illustrating the East Tullos road link should be revised accordingly in the Framework

<p>never assessed in the preparation of the LDP. Such a development would have a significant impact on both the greenspace itself and the public use of that greenspace. It will be important that the next review of the LDP fully assesses the implications of any new road in determining whether or not it would be acceptable.</p>	<p>undertaken as part of a local development plan review. The relevant graphics and text illustrating the East Tullos road link should be revised accordingly in the Framework document.</p>	<p>document, to outline that any such route would be subject to future assessments.</p>
<p>The removal of the proposed harbour visualisations (for example Figure 13), or a revision of these visualisations, in order to give a more accurate representation of the likely built form and scale.</p>	<p>Concerns noted. The current 3D visuals for the proposed harbour do not show an accurate representation of the built nature of the harbour. 3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part of the harbour proposal.</p>	<p>3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed. The 3D visuals will most likely be removed, because at this stage and until the 'design and build' contract is approved, more accurate visuals cannot be produced.</p>
<p>Attached as an annex to this letter are a range of comments/ suggestions on the Draft Aberdeen Bay of Nigg Development Framework. I hope you find these comments helpful.</p>	<p>Noted. This annexe will be communicated to the design consultants for action, including associated revisions.</p>	<p>SNH annexe will be communicated to the design consultants for action, including associated revisions.</p>
<p>9. Forestry Commission Scotland See Appendix 3 for record of full representation</p>		
<p><i>Summary of Representation</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>Impact on woodland at St. Fittick's Park and may impact on woodland within the East Tullos and Altens areas. The road re-alignment of St. Fittick's Road and the possible link road from East Tullos to Bay of Nigg</p>	<p>Comment noted. A development of this nature will inevitably result in a loss of valued green/open space/woodland. As part of the consultation process on the Harbour Revision Order, ACC advised that further information regarding the extent of such an</p>	<p>The relevant graphics and text illustrating the East Tullos road link should be revised accordingly in the Framework</p>

<p>is planned over woodland in St. Fittick's Park.</p>	<p>impact is required, including adequate assessment of its value and as such, clarification regarding community benefits as part of the mitigation is also required.</p> <p>Comments noted. Any potential new road link into East Tullos should be assessed in the future, alongside an evaluation of need and demand for any new routes required to service the demands of the harbour and associated industrial/business land – to be undertaken as part of a local development plan review. The relevant graphics and text illustrating the East Tullos road link should be revised accordingly in the Framework document.</p>	<p>document, to outline that any such route would be subject to future assessments.</p> <p>Reference and understanding of the value of use of existing space to be incorporated into the Framework document.</p>
<p>Scotland's woodlands and forestry are an economic resource; there is a strong presumption in favour of protecting Scotland's woodland resources. The policy aims to protect the existing forest resource in Scotland and supports woodland removal only where it would achieve significant and clearly defined additional public benefits. In some cases, including those associated with development, a proposal for compensatory planting may form part of this balance. This should be taken into account when preparing the development plans.</p>	<p>Comments noted. Reference to these policies should be incorporated into the Development Framework document, under 'Existing Policy & Regulations' section and reference to importance of woodland protection added to the design and development principles for the 3 areas.</p>	<p>Add policy references to 'Existing Policy & Regulations' section and reference to importance of woodland protection added to the design and development principles for the 3 areas (page 38 onwards).</p>
<p>Tree Felling Proposals for development within woodlands should assess if the underlying purpose of the proposals can reasonably be met without resorting to woodland removal. If so, no woodland removal should occur; if not, design approaches which reduce the scale of felling required to facilitate the development should be considered and integration of the development within the existing woodland structure should be a key part of the consenting process.</p>	<p>Comments noted, however, detailed surveys regarding tree felling is beyond the scope of a Development Framework. Additional reference to the importance of woodland protection and implications in terms of landscape impact and habitat connectivity should be added to the design and development principles sections of the Development Framework.</p>	<p>Reference to importance of woodland protection added to the design and development principles for the 3 areas (page 38 onwards).</p>

<p>Environmental Statement The Environmental Statement should include a stand-alone chapter on “Forestry” that describes and recognises the social, economic and environmental value of the woodland and take into account the fact that once mature, the forest would have been managed into a subsequent rotation, often through a restructuring proposal that would have increased the diversity of tree species and the landscape design of the forest.</p>	<p>The Environmental Statement is a separate process to the Development Framework, concerns just the harbour expansion project and is being undertaken by a team of environmental consultants on behalf of Aberdeen Harbour Board. This, alongside all statutory consultation responses received, will be assessed by Transport Scotland / Scottish Government as part of the decision-making process for the associated Harbour Revision Order.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>UK Forestry Standard Felling operations and compensatory planting (if relevant) must be carried out in accordance to good forestry practice as defined in the UK Forestry Standard (UKFS).</p>	<p>Comments noted. Reference to UK forestry standard for all forestry practices should be incorporated to the design and development principles sections of the Development Framework.</p>	<p>Reference to UK forestry standard added to the design and development principles for the 3 areas (page 38 onwards).</p>
<p>Forestry Commission Scotland (FCS) FCS works as part of Scottish Government to protect and expand Scotland’s forests and woodlands and so has an interest in developments that have the potential to impact on local forests, woodlands or the forestry sector.</p>	<p>The Environmental Statement is a separate process to the Development Framework, concerns just the harbour expansion project and is being undertaken by a team of environmental consultants on behalf of Aberdeen Harbour Board. This, alongside all statutory consultation responses received, will be assessed by Transport Scotland / Scottish Government as part of the decision-making process for the associated Harbour Revision Order.</p>	<p>No amendment to Development Framework document is proposed.</p>
<p>10. RSPB Scotland See Appendix 3 for record of full representation</p>		
<p><i>Summary of Representation</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p><i>Development Framework Section 01</i> The objectives of the proposed framework should include a commitment to ‘protect and enhance the natural environment and biodiversity’.</p>	<p>Comments noted. Additional objective added to Development Framework, to read along lines of “protect and enhance the natural environment and biodiversity”.</p>	<p>Additional objective added to Development Framework Section 01.</p>

<p><i>Development Framework Section 02 – Environment and Topography</i></p> <p>The importance of the award winning East Tullos Burn Project should be made clearer and its importance for water quality, greenspace and biodiversity. See below for further comments on the Fitticks Park/East Tullos Burn area.</p>	<p>Comments noted. The significance and value of the East Tullos Burn project should be explicit here (page 7).</p>	<p>Reference and understanding of the value of use of existing space to be incorporated into the Framework document – including East Tullos Burn project.</p>
<p><i>Development Framework Section 02 – Landuse and Designations</i></p> <p>East Tullos Burn should be listed as part of St Fitticks Park in the paragraph on open space and recreation.</p>	<p>Comments noted and agreed. Amend document so that East Tullos Burn is listed as part of St Fitticks Park in the paragraph on open space and recreation (page 12).</p>	<p>Amend Development Framework so that East Tullos Burn is listed as part of St Fitticks Park in the paragraph on open space and recreation (page 12).</p>
<p><i>Development Framework Section 04</i></p> <p>The visualisations in Figure 13, the opening of Section 05 and others do not show the full extent of the development surrounding the development. Whilst the exact level of construction may not have been determined, some example visualisations in this document would be less misleading.</p>	<p>Concerns noted and agreed. The current 3D visuals for the proposed harbour do not show an accurate representation of the built nature of the harbour. 3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed.</p> <p>As part of the statutory consultation response on the Harbour Revision Order, ACC have advised that a mitigation programme which details careful siting / design of the proposed security fencing, lighting columns and other structures should form part of the harbour proposal.</p>	<p>3D visuals within the Framework should be replaced with those which more accurately represent the activities of the harbour proposal, or removed. The 3D visuals will most likely be removed, because at this stage and until the ‘design and build’ contract is approved, more accurate visuals cannot be produced.</p>
<p><i>Development Framework Section 05</i></p> <p>Figure 22 (<i>Delivery Plan – Years 1-5</i>) suggests natural environment improvements to the St Fitticks Park/East Tullos Burn area which would be welcomed, but then in Figure 31 (<i>Development Components Plan Years 11-15</i>) a new route as part of Major</p>	<p>Comments noted. Any potential new road link into East Tullos should be assessed in the future, alongside an evaluation of need and demand for any new routes required to service the demands of the harbour and associated industrial/business land – to be undertaken as part of a local development plan review. The relevant graphics and text illustrating the East Tullos road link</p>	<p>The relevant graphics and text illustrating the East Tullos road link should be revised accordingly in the Framework document, to outline that any such route would be subject to</p>

<p>Infrastructure Improvements is described across this Green Belt area. We strongly recommend that alternatives to the suggested infrastructure improvements on Figure 31 are explored further to avoid damage to the East Tullos Burn Project and the Green Space Network. This area of St Fitticks Park is also an important community project. The part of the Bay of Nigg Development Framework falls beyond the current Aberdeen LDP, so any new major infrastructure will have to be fully assessed as part of the next Aberdeen LDP.</p>	<p>should be revised accordingly in the Framework document.</p>	<p>future assessments.</p>
<p>As part of the design process we expect that opportunities for mitigating potential impacts on birds and other wildlife will be considered. We strongly recommend that options for compensatory or enhancement measures also be explored.</p>	<p>Proposals for mitigation and compensatory enhancement are to be discussed and detailed through the environmental impact assessment process for the associated Harbour Revision Order for the proposed harbour expansion process. As part of the statutory consultation process on this, ACC have advised that additional bird surveys and associated mitigation management plans are required as part of the assessment of this HRO application.</p>	<p>No amendment to Development Framework document is proposed, however, ACC have advised (as part of the HRO consultation process) that additional bird surveys and associated mitigation management plans are required as part of the harbour expansion proposal.</p>