

**From:** William Smith  
**Sent:** 14 October 2015 18:00  
**To:** LDP  
**Subject:** Consultation Draft Nigg Bay Development Framework

Name: Mr William C Smith

Organisation: None

Address: [REDACTED]

Post Code: [REDACTED]

Telephone: [REDACTED]

email: [REDACTED]

While Generally in favour of the development would like assurances re some points.

1. The mainly gravel beach is home to wading birds eg Golden Plovers, Turn Stones etc . If part going to be redeveloped assurance should be made that works affecting there breeding sites be done out of breeding season to these birds can find alternative breeding and sites.
2. Will advised in consultation at Torry library that lorry traffic would be directed away from streets of Torry and directed to south of Nigg Bay what assurances that this policy can be enforced.
3. Assumed sewage waste no longer pumped out to sea via Aberdeen Long Sea Outfall and would like assurances on this matter and this facility now redundant. Also if breached in deeping the bay no adverse consequences will arise.
4. Apart from practice area I would like assurances development won't encroach in anyway on Balnagask golf course and for foreseeable future.

Regards - William Smith

**From:** Colette Snelling  
**Sent:** 06 November 2015 18:51  
**To:** LDP  
**Subject:** Draft Nigg Bay Development Framework.

I stay in Torry and I object to the proposed Draft Nigg Bay Development Framework.

#### ROADS

The current roads in Torry can't cope with the amount of traffic we have now. There is gridlock at peak times. I am very concerned that additional traffic will be generated by the construction and operation of these new facilities. This will have a huge impact on the people of Torry with heavy vehicles using residential streets as "rat runs", air quality declining because of increased vehicle emissions and all the noise and vibration that HGVs and other vehicles bring.

#### ENVIRONMENT

I am worried about the loss of so much green space in our area. If these developments go ahead, Torry will be completely surrounded by industrial sites. This will have a significant impact on the lives of everyone who lives in Torry. Much of the area highlighted for development is valued by locals as a place to spend their leisure time. If these developments go ahead a lot of wildlife habitat will be lost, both for marine and onshore life. The dredging and blasting in the Bay of Nigg could drive away our dolphins permanently. We could lose our recently-constructed wetlands to new roads to serve the new harbour. The Bay of Nigg and surrounding area is valuable habitat for many species of bird, some of them rare and also provides a safe haven for migrating birds exhausted after crossing the North Sea.

The Bay of Nigg is also home to two rare plants – the Oyster Plant and the Sea Pea. If these developments are given the go ahead, these plants as well as many others could be adversely affected.

As well as losing green space and having increased traffic, there will be considerable noise during both the construction and the operational phases of these developments. As the construction is estimated to last several years, I think this is unacceptable adjacent to a heavily-populated area.

#### AIR QUALITY

Torry already has poor air quality (e.g. pollution levels in Wellington Road) 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.

#### LIGHT POLLUTION

At present the areas affected by these developments are mainly in darkness. The increased light levels could have a detrimental effect on local wildlife and bird life as well as jeopardising views of the night sky.

#### SCATTERING ASHES

For generations, people with Torry connections have scattered their loved ones' ashes at the Bay of Nigg. If these developments go ahead, they will be no longer able to do this. Also, people will not be able to pay their respects in the place where ashes have been scattered previously.

#### VISUAL IMPACT

Many people on Torry have a view of the Bay of Nigg and the land surrounding it. The proposed developments will change the view forever and the natural scenery we have now will be lost. I think this is unacceptable.

#### ECONOMY

Since these projects were first suggested, the price of oil has decreased dramatically. I am concerned that because of this, these projects will no longer be financially viable. For example, the harbour is very quiet at the

moment with boats being laid up and crews laid off. With no increase in oil price likely in the near future, does it really make economic sense for these projects to go ahead?

Regards

Colette Snelling

Rebecca Kerr

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**From:** LDP  
**To:** Lynn Thomson  
**Subject:** RE: Draft Nigg Bay Development Framework - comments

**From:** Lynn Thomson  
**Sent:** 11 November 2015 15:21  
**To:** LDP  
**Subject:** Draft Nigg Bay Development Framework - comments

Dear Sir/Madam

As a resident of Torry, I wish to express my deepest concerns regarding the Draft Nigg Bay Development Framework.

#### Infrastructure considerations

The roads in Torry can't cope with the amount of traffic we have now. There is gridlock at peak times. I am very concerned about the additional traffic generated by the construction and operation of these new facilities. This will have a huge impact on the people of Torry with the possibility that heavy vehicles will use residential streets as "rat runs", air quality declining further because of increased vehicle emissions and all the noise and vibration that HGVs and other vehicles bring. In addition, as a mitigation measure the Harbour Board propose that lorries should be diverted through Altens and on to the already congested Wellington Road. With all the current and planned development in the area of Wellington Road (housing, proposed Academy, new industrial units etc) this will exacerbate existing congestion.

#### Natural environment

The "Loirston Recreation Area" sign (erected by the City Council and its partners) at the Bay of Nigg car park reads:

"For these reasons it is important to protect this area of countryside from being built upon, to improve its appearance and to offer everyone the opportunity to enjoy it".

I do hope that the council keep to their word.

I am worried about the potential loss of so much green space in our area and the fragmentation of natural habitat. If these developments go ahead, Torry will be completely surrounded by industrial sites. This will have a significant impact on the lives of everyone who lives in Torry. Much of the area highlighted for development is valued by locals as a place to spend their leisure time (birdwatchers, ramblers, dog walkers, kite flyers, surfers, kayakers, paragliders, mountain bikers to name just a few).

If these developments go ahead a lot of wildlife habitat will be lost, both for marine and onshore life. The dredging and blasting in the Bay of Nigg could drive away our dolphins permanently and can also be injurious to their health, and has been shown on occasion to be fatal to cetaceans. In addition the dredging and blasting is estimated to last 19 months and the piling 23 months. Torry would have several years of major noise disruption, even before we consider the noise of constructing breakwaters and "standard" construction disturbance and long before we have to contend with a harbour working 24/7 on our doorsteps.

Currently the Bay of Nigg is one of the very few areas in Torry where you can escape from all man-made noise. There's just the sound of the waves and the seabirds, no traffic, no music, no industry. I'd consider this in itself to be a significant loss to the area.

We could lose our recently-constructed wetlands to new roads to serve the new harbour. The Bay of Nigg and surrounding area are valuable habitat for many species of bird, some of them rare and also provide a safe haven for migrating birds exhausted after crossing the North Sea. Some rare birds have already been spotted at the wetlands (see the "Birds Fae Torry" message board on the Bird Forum website for comprehensive sightings from local expert birdwatchers). Areas recently planted with native trees could also be lost as "temporary" construction sites for the new harbour.

The Bay of Nigg is also home to three rare plants – the Oyster Plant, Sea Pea and Curved Sedge. If these developments are given the go ahead, these plants as well as many others could be adversely affected.

Torry already has poor air quality (e.g. pollution levels in Wellington Road) and well-documented odour issues. Additional traffic and industrial activity (the generation of contaminated dust is recognised in the Environmental Impact Assessment as a risk) are likely to add significantly 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 – in my opinion these developments can only exacerbate this sad state of affairs.

At present the areas affected by these developments are mainly in darkness. The increased light levels could have a detrimental effect on local wildlife and birdlife as well as jeopardising views of the night sky. It is possible to view the Northern Lights from Girdleness at present, however light pollution from a new harbour will probably prevent this in the future. The lights proposed for the harbour are over 80 feet tall!

For generations, people with Torry connections have scattered their loved ones' ashes at the Bay of Nigg. If these developments go ahead, they will be no longer able to do this. Also, people will not be able to pay their respects in the place where ashes have been scattered previously. Access to the bay will be severely restricted as it is proposed to erect 9.5 foot security fences around the entire site!

Many people on Torry have a view of the Bay of Nigg and the land surrounding it. The proposed developments will change the view forever and the natural scenery we have now will be lost. I think this is unacceptable.

In addition, these developments will have a significant adverse impact on the settings of Girdleness Lighthouse and Old St Fittick's Church.

#### Economic considerations

Since these projects were first suggested and the economic case compiled, the price of oil has decreased dramatically. I am concerned that because of this, these projects will no longer be financially viable. For example, the harbour is very quiet at the moment with boats being laid up and crews laid off (in an interview broadcast on 27 September 2015, Captain Shaw of Aberdeen Harbour Board admitted that the market for supply ships had slumped dramatically in recent months). With no increase in oil price likely in the near future, does it really make economic sense for these projects to go ahead?

Also, we were initially advised that 15,500 jobs would be generated by the new harbour project. However, in October 2015, the Harbour Board now advise that 3020 jobs ACROSS Scotland (i.e. not just in the City and Shire) will be generated. There appear to be glaring discrepancies in what we're being told.

#### Public engagement activities

I'd also like to record my dissatisfaction with the public engagement activities associated with the harbour development. 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).

I strongly feel that 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. The "pretty" images of the new harbour that are being widely circulated are in my view very misleading and misrepresentative. These do not depict the 9.5 foot security fencing, the new car parking, welfare blocks, the planned 55 quayside tanks, some of which are 40 feet in height or the extensive areas that will be lost to temporary construction sites, some of which will virtually engulf the historic and vulnerable Old St Fittick's Church.

I trust that my feedback is of interest.

Yours sincerely

Lynn Thomson



Mrs B Lyon



I am a resident of Torry and I object to the proposed Draft Nigg Bay Development Framework.

Firstly I would like to know where Democracy has gone with this development?

The current infrastructure in Torry can't cope with the amount of traffic we have now. There is gridlock at peak times. I am very concerned that additional traffic will be generated by the construction and operation of these new facilities. This will have a huge impact on the people of Torry with heavy vehicles using residential streets as "rat runs", air quality declining because of increased vehicle emissions and all the noise and vibration that HGVs and other vehicles bring. How does this sit in the Current Climate change debate?

#### ENVIRONMENT

I am concerned about the loss of our green space. Torry will be entombed in industrialisation and pollution. This will have a Major impact on the health of the people of Torry. How does this sit in the current Climate Change debate. This will have a huge impact on wildlife habitat both for marine and onshore life. The dredging and blasting in the Bay of Nigg will drive away our dolphins (which this Council promotes widely). We will lose our recently-constructed wetlands. The Bay of Nigg and surrounding area is valuable habitat for many species of bird, some of them rare and also provides a safe haven for migrating birds exhausted after crossing the North Sea.

#### VISUAL IMPACT

Many people on Torry have a view of the Bay of Nigg and the land surrounding it. The proposed developments will only leave a view of high security fencing. This beautiful harbour will be lost forever.

#### ECONOMY

Since these projects were first suggested, the price of oil has decreased dramatically. I am concerned that because of this, these projects will no longer be financially viable. For example, the harbour is very quiet at the moment with boats being laid up and crews laid off. With no increase in oil price likely in the near future, does it really make economic sense for

The Bay of Nigg is also home to two rare plants – the Oyster Plant and the Sea Pea. If these developments are given the go ahead, these plants as well as many others could will possible also be lost.

#### NOISE POLLUTION

Dredging and blasting will take place for 18 months 24/7, the noise pollution is bad enough from the existing harbour, this will mean that we will have the noise in Stereo.

#### AIR QUALITY

Torry already has poor air quality (e.g. pollution levels in Wellington Road) 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.

#### LIGHT POLLUTION

At present the areas affected by these developments are mainly in darkness. The increased light levels will have a detrimental effect on local wildlife and birdlife as well as jeopardizing views of the night sky, residents will also suffer with lights that are 91 feet high.

#### SCATTERING ASHES

For generations, people with Torry connections have scattered their loved ones' ashes at the Bay of Nigg. If these developments go ahead, they will be no longer able to do this nor pay their respects.

Disgusted resident.



**Rebecca Kerr**

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**From:** Planning Aberdeen <planning.aberdeen@sepa.org.uk>  
**Sent:** 04 November 2015 12:17  
**To:** LDP  
**Subject:** PCS/142875 Draft Nigg Bay Development Framework & Environmental Report

Dear Rebecca

Thank you for your e-mail of 25 September 2015 regarding the public consultation on the Draft Nigg Bay Development Framework and associated Environmental Report (SEA).

Further to the advice in our response of 12 June 2015 (PCS/140438) on the draft development framework we note that in regard to the comments in section 1.1 of our response 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.

We also note that 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.

We don't have any further advice or comments on the draft at this stage. However, we can confirm we have received a copy of the Environmental Report through the SEA Gateway and will comment on this by separate cover.

Regards,

**Alison Wilson**

Senior Planning Officer

Planning Service, SEPA, Inverdee House, Baxter Street, Torry, Aberdeen, AB11 9QA

Direct line: 01224 266656 email:alison.wilson@sepa.org.uk

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**From:** Rebecca Kerr [<mailto:ReKerr@aberdeencity.gov.uk>]  
**Sent:** 25 September 2015 17:38  
**To:** Rebecca Kerr  
**Subject:** Draft Nigg Bay Development Framework & Environmental Report

Dear Consultee,

Please find attached letter regarding the upcoming public consultation on the Draft Nigg Bay Development Framework and associated Environmental Report (SEA).

If you have any questions on this matter, please do not hesitate to contact myself directly.

Kind regards,  
Rebecca

**Rebecca Kerr** | Planner - Masterplanning, Design and Conservation | Planning and Sustainable Development | Communities, Housing and Infrastructure | Aberdeen City Council | Business Hub 4 | Ground Floor North | Marischal College | Broad Street | Aberdeen | AB10 1AB

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**Masterplanning, Design & Conservation Team:** Delivering Quality Places – Past, Present, Future  
[www.aberdeencity.gov.uk/masterplanning](http://www.aberdeencity.gov.uk/masterplanning)

Buidheann-stiùiridh Cultair, an Roinn Eòrpa agus Cùisean an Taoibh a-Muigh  
 Culture, Europe and External Affairs Directorate  
 Roinn a' Chultair agus Àrainneachd Eachdraidheil  
 Culture and Historic Environment Division

E: LBCCACNotifications@gov.scot



Ms Rebecca Kerr  
 Planning and Sustainable Development  
 Aberdeen City Council  
 Business Hub 4  
 Marischal College  
 Broad Street  
 ABERDEEN  
 AB10 1AB



Ur faidhle/Your ref :  
 Ar faidhle/Our ref :LDP/A/2  
 Our Case ID: 201503966  
 11 November 2015

Dear Ms Kerr

### **Nigg Bay Development Framework**

Thank you for your consultation on the environmental report for Nigg Bay Development Framework, which was received by the Scottish Government's SEA Gateway on 25 November 2015.

On 1 October 2015, Historic Scotland and The Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS) ceased to operate and have been replaced by a new organisation, Historic Environment Scotland (HES). This new organisation (which is a Non Departmental Public Body) was established by the Historic Environment Scotland Act 2014.

Consultations received by Historic Scotland before 1 October require a response direct from Scottish Ministers. This letter contains Scottish Ministers' comments for our historic environment interests.

Ministers have sought the advice of Historic Environment Scotland on the strategy and on the adequacy of the environmental report, and that advice is set out in the Annex below. If you wish to discuss this advice in further detail, please contact Andrew Stevenson ([andrew.stevenson2@gov.scot](mailto:andrew.stevenson2@gov.scot) ; 0131 668 8960) of Historic Environment Scotland.

Yours sincerely

### **Culture and Historic Environment Division**

Cidhe Bhictòria, Dùn Èideann EH6 6QQ  
 Victoria Quay, Edinburgh EH6 6QQ  
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## Annex:

### Historic Environment Scotland's Advice;

#### Part 1: Nigg Bay Development Framework

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. HES understands that the framework sets the context for further detailed masterplans for the new harbour, Altens and East Tullos. It is therefore 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. In light of this the framework makes clear reference for the need of the lower-level masterplans to address these issues in detail and to consider how best to mitigate any identified impacts on either historic environment assets or their setting. HES advises Ministers that they are content to continue to work with Aberdeen Council as the proposals progress.

#### Part 2: Environmental Report

HES welcomes that Historic Scotland's comments at the scoping stage (dated 31 August 2015) have been taken into account in the assessment process. The environmental report is concise and clearly presented and, subject to the following comments, HES advises Ministers that they are content to agree with the findings of the assessment presented.

#### Framework for Assessing Environmental Effects

This section clearly sets out the methodology utilised within the assessment. The use of SEA objectives and assessment questions in order to test the options and themes for each masterplan area is welcomed. As a point of detail, HES note that the assessment question aimed at testing the framework for effects on the setting of historic environment considers the "impact on the landscape setting of Aberdeen or any historic features or sites". It is important to note that landscape context constitutes only one element of the definition of setting in the context of the historic environment. While it is HES opinion that this has not unduly influenced the assessment findings it will be important that the more detailed masterplan assessments ensure that setting impacts are considered more fully. Further details on what constitutes setting can be found in the Managing Change in the Historic Environment: Setting document which can be found at <http://www.historic-scotland.gov.uk/setting-2.pdf>.

#### Assessment of the Content of the Framework

##### Nigg Bay

HES advises Ministers that they are generally content to agree with the findings of the assessment in relation to the Nigg Bay area. The potential for negative effects on designated and un-designated sites is noted against themes such as land-use, economy and infrastructure. Of particular sensitivity here 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. It should also be noted that the last paragraph summarising the overall effect of the Economy and Business theme (page 101) appears to relate to biodiversity and is therefore missing the reasoning on why this identified effect is not considered significant for the historic environment.

## Altens

HES welcome the recognition of the potential effect development in this area could have on the scheduled cairns of Tullos Hill. HES are 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.

## 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. Again, this issue will require to be considered in further detail at the masterplan level.

## Proposed Mitigation Measures

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.

## Monitoring

The monitoring framework does not have specific reference to the historic environment. While it is accepted that no significant effects have been identified it should be noted that the significance of these effects are heavily dependent on the successful identification and delivery of mitigation, particularly in reference to the St Fittick's Church and its setting. This is recognised within the proposed mitigation measures table (under landscape) and HES would therefore recommend to Ministers that this is brought through to the monitoring framework.

HES hope this is helpful. None of the comments contained in this advice should be construed as constituting a legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Environment Scotland's commitment to capacity-building in SEA.

Please contact Andrew Stevenson on 0131 668 8960 or [Andrew.Stevenson2@gov.scot](mailto:Andrew.Stevenson2@gov.scot) should you wish to discuss this advice.



10<sup>th</sup> November 2015

Rebecca Kerr  
 Planning and Sustainable Development  
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Dear Ms Kerr

**Draft Nigg Bay Development Framework & Environmental Report**

Thank you for giving Scottish Water the opportunity to comment on the public consultation of the Draft Nigg Bay Development Framework and Environmental Report. Having previously commented on the Development Framework, as part of the stakeholder consultation process, we now have very few comments to make. The observations we have are noted below.

In Scottish Water's previous consultation response we advised that Nigg Waste Water Treatment Works had been referred to incorrectly as a "Water Treatment Plant" on a number of occasions within the document. We are happy to see that most of these incidents have been corrected, but have found that a couple still exist. The first is on page 7; paragraph 2 and the other can be found on the label for the picture on page 25.

The 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. In relation to Scottish Water's water and wastewater infrastructure, early engagement will be key to achieving this. This is especially true in the case of facilitating a water supply for the new 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.

Scottish Water now has a dedicated Environmental Impact Assessment (EIA) mailbox ([EIA@scottishwater.co.uk](mailto:EIA@scottishwater.co.uk)). The forthcoming EIA for the Nigg Harbour Development can be forwarded directly here for us to review and provide a consultation response.

We look forward to our continued involvement in the progress of the Nigg Bay Development Framework and the production of the individual Masterplans for the area. Should you require additional support or guidance from Scottish Water, we would be happy to assist. Please do not hesitate to contact me if this is the case.

Yours sincerely



**Susanne Stevenson**  
*Development Planner – Scottish Water*



**Scottish Natural Heritage**  
**Dualchas Nàdair na h-Alba**

All of nature for all of Scotland  
Nàdar air fad airson Alba air fad

Rebecca Kerr  
Planner (Masterplanning, Design and Conservation Team)  
Aberdeen City Council  
Business Hub 4, Marischal College  
Broad Street Aberdeen  
AB10 1AB

Our ref: CPP138457

16 November 2015

Dear Rebecca

**Draft Aberdeen Nigg Bay Development Framework – Supplementary Guidance**

Thank you for consulting Scottish Natural Heritage on the above Supplementary Guidance.

**Summary**

The main changes we are seeking to this document are:

- A greater recognition of the value and use of existing open space and other green infrastructure.
- 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 (while the SEA Environmental Report makes reference to the importance of this, the Framework does not).
- 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 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.
- 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.

Attached as an annex to this letter are a range of comments/ suggestions on the Draft Aberdeen Nigg Bay Development Framework. I hope you find these comments helpful.

Should you wish to discuss this response please contact Sheena Lamont via [Sheena.Lamont@snh.gov.uk](mailto:Sheena.Lamont@snh.gov.uk) .

**Scottish Natural Heritage, Inverdee House, Baxter Street, Aberdeen, AB11 9QA**  
Tel 01224 266500 Fax 01224 895958 [www.snh.gov.uk](http://www.snh.gov.uk)



INVESTOR IN PEOPLE

Yours sincerely

**Ewen Cameron**  
Operations Manager  
Tayside and Grampian  
[Ewen.cameron@snh.gov.uk](mailto:Ewen.cameron@snh.gov.uk)



Annex 1 Suggested changes/ additions to the draft Nigg Bay Development Framework

Section	Comments and suggested changes/ additions
Introduction and Vision	<p>Reword the fifth bullet as follows <i>"To ensure consideration and identification of all opportunities to promote sustainable low carbon development that <u>maximises the benefits of green infrastructure</u>"</i></p> <p>Reason: To provide more balance between the economic, social and environmental objectives.</p>
Local context. Topography and Visibility	<p>These sections focus on topography, visibility and views. Although there are some descriptions of landscape character, there is no map that shows the limits of each of the relevant landscape character areas (LCAs).</p> <p>We suggest there needs to be a section entitled '<i>Landscape Character</i>' and that each of the LCAs (e.g. hill, farmland, coast) are described in turn, with 'views' treated as one part of each landscape character area description.</p> <p>We refer you to <a href="#"><i>"Landscape Character of Aberdeen"</i> (SNH)</a>, particularly page 79-84. This should provide you with any additional information you need to enable you to produce a clearer summary of the landscape character of this area.</p> <p>Reason: To provide more focus on landscape character. Landscape impacts are not just about 'key views'.</p>
Local context. Protected fauna. Line 2	<p>The term SPA should be introduced in full, so <i>"..Special Protection Areas (SPAs).."</i></p>
Local context. Geology?	<p>This section should include a paragraph on geology, with information on Nigg Bay SSSI. We suggest the following:</p> <p><i>"Geology</i></p> <p><i>The Nigg Bay Site of Special Scientific Interest is a 4.4ha site to the south end of Nigg Bay that illustrates several of the characteristic glacial deposits of the area. Since the late 19th century, the Nigg Bay section has been recognised as a key reference site for interpreting the glacial history and ice movement patterns in north-east Scotland. It illustrates particularly well the complexity of deposits which may be produced during a single glacial episode. The key objective for the management of this site is to maintain the visibility of, and access to the exposures."</i></p>

Local context. Designations	<p>This currently includes statutory nature conservation designations (SSSIs and Natura) and local planning designations (Green Belt/ City Centre, LNCSs). Consequently it appears odd that 'City Centre' is included on this list.</p> <p>We suggest you cover the statutory nature conservations under the Environment and Topography section and rename this section '<i>Local Planning Designations</i>'</p> <p>Reason: To provide a clearer distinction between statutory designations and planning designations.</p>
Local Context. Place & People.	<p>We suggest you include a section 'Eco-tourism' and information on the RSPB Dolphinwatch scheme.</p> <p>Here are some key things about this scheme that we recommend you include:</p> <ul style="list-style-type: none"> <li>• The scheme has run for the last 3 years from Torry Battery</li> <li>• It attracted 5000 people this year</li> <li>• Visitors come from Aberdeen, the UK and across the world</li> <li>• Bottlenose dolphins can be seen on 95% of visits</li> <li>• A survey this year found that a third of visitors to Dolphinwatch had come to Aberdeen specifically for that reason</li> </ul> <p>Reason: To highlight the existing value to the economy of this important area of open space.</p>
Existing Policy and Regulations	<p>We suggest the following pieces of key national guidance are added to this list</p> <p>Green Infrastructure: Design and Place-making: Scottish Government Guidance.</p> <p>Creating Places - A policy statement on architecture and place for Scotland.</p>
Drivers for change and sensitivities	<p>Figure 13. We note that there is a caveat next to this visualisation that "<i>not all built form is illustrated on the visualisation</i>".</p> <p>Notwithstanding this however, we think that the visualisations present a potentially misleading impression of the likely visual impact. We recommend therefore that either figure 13, and other similar figures, are removed from the document, or that efforts are made to provide some indication in the visualisation of the likely scale and mass of</p>

the buildings, based on current knowledge.

Reason: To give a more accurate prediction of likely visual impact and to inform the basis of more detailed design at the site level.

**Grampian Conservancy**  
Portsoy Road  
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Aberdeenshire  
AB54 4SJ

Masterplanning, Design and Conservation Team  
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Tel 01466 794542  
Grampian.cons@forestry.gsi.gov.uk

Conservator  
James Nott

13<sup>th</sup> November 2015

Dear Sir/Madam

### **Draft Nigg Bay Development Framework**

The above development will impact on woodland at St. Fittick's Park and may impact on woodland within the East Tullos and Altens Masterplan areas. The road re-alignment of St. Fittick's Road and the possible link road from East Tullos to Nigg Bay is planned over woodland in St. Fittick's Park.

#### **Forestry**

Scotland's woodlands and forestry are an economic resource, as well as an environmental asset, as stated in the third [National Planning Framework](#) (para 4.23).

There is a strong presumption in favour of protecting Scotland's woodland resources. For this reason the Scottish Government published a [Policy on Control of Woodland Removal](#) in 2009 (refer Scottish Planning Policy paragraph 218).

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.

The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the policy on control of woodland removal. These should be taken into account when preparing the development plans.

#### **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.

Consideration needs to be given to the implication of felling operations on habitat connectivity, landscape impact, impact on timber transport network and forestry policies included in the local and regional Forestry and Woodland Strategies and local development plans.

#### **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.

The chapter should describe the baseline conditions of the forest, including its ownership. This will include information on species composition, age class structure, yield class and other relevant crop information. The baseline should be prepared from existing records, site surveys and aerial photographs.

The chapter should clearly indicate proposed areas of woodland for felling, details of the area to be cleared along with evidence to support the proposed scale and phasing of felling. The chapter should describe the changes to the forest structure, the woodland composition and describe the work programme. A felling plan should clearly identify which areas are to be felled and when.

Trees to be felled must be replaced by replanting on-site or on an alternative site (compensatory planting). A restocking plan should form part of this chapter, the plan should show which areas are to be replanted and when. The plan should clearly identify and describe the restocking operations including changes to the forest area and species composition, with detail and timing of the full work programme, including information on the maintenance and protection programme up to establishment.

Details of the proposed mitigation should not be left to post-consent Habitat Management Plans (or others) to decide and implement. The specifics of the proposed mitigation should be included in a Compensatory Planting Plan, appropriately described in the Environmental Statement, as they are vital in understanding the development in full.

#### **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). The UKFS, supported by a series of guidelines, is the reference standard for sustainable forest management in the UK and provides a basis for regulation and monitoring. The Scottish Government expects all forestry plans and operations in Scotland to comply with the standards. Environmental Statements for projects that impact on forests should clearly state that the project will be developed and implemented in accordance with the UKFS and associated guidelines. A key component of this is to ensure that even-age woodlands are progressively restructured in a sustainable manner: felling coupes should be phased to meet adjacency requirements and their size should be of a scale which is appropriate in the context of the surrounding woodland environment.

#### **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.

FCS should be considered as the main forestry consultee and should be consulted throughout the development of the proposal to ensure that proposed changes to the woodland are appropriate and address the requirements of the Scottish Government's Policy on Control of Woodland Removal and the UK Forestry Standard.

Relevant discussion on forestry matters should take place prior to the submission of an Environmental Statement and developers and their consultants should allow sufficient time in their project plan to accommodate such advice. Developers should consult the Grampian Conservancy office that can be accessed at: <http://scotland.forestry.gov.uk/supporting/management/conservancies>.

Yours sincerely



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18 November 2015

Dear Rebecca,

### Draft Aberdeen Nigg Bay Development Framework & Environmental Guidance

Thankyou for consulting RSPB Scotland on the consultation above and granting us an extension to make comments. Please find our comments below.

#### *Development Framework Section 01*

The objectives of the proposed framework should include a commitment to 'protect and enhance the natural environment and biodiversity'.

#### *Development Framework Section 02 – Environment and Topography*

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.

#### *Development Framework Section 02 – Landuse and Designations*

East Tullos Burn should be listed as part of St Fitticks Park in the paragraph on open space and recreation.

#### *Development Framework Section 04*

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.

#### *Development Framework Section 05*

Figure 22 (*Delivery Plan – Years 1-5*) suggests natural environment improvements to the St Fitticks Park/East Tullos Burn area which would be welcomed, but then in Figure 31 (*Development Components Plan Years 11-15*) a new route as part of Major 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 Nigg Bay 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.

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The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

## RSPB Scotland

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

Yours sincerely,



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