

Mrs Betty Lyon  
38 Tullos Crescent  
Torry  
Aberdeen  
AB11 8JW

I am a Torry resident and I strongly object to the New Harbour Proposal for the following reasons:

#### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The “land take” associated with this development seems to have been creeping further and further up St Fittick’s Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry’s green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

*\*Netta Weinstein et al “Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime” Bioscience, November 2015*

#### COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if the new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.



For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

#### PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accidents.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back)



which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

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### Noise

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### Smell and fumes

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either.

It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a “barrier” effect created by the River Dee which “traps” odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board’s EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

### Lights

The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like to ask is there a reason why they need to be so high. Could lighting be confined to selected, active areas of the harbour rather than being “always on”?

## VIEW OF STATUTORY AND OTHER CONSULTEES

There is an old information board in the Bay of Nigg car park, erected by Aberdeen City Council and several partner organisations. Part of this sign 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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

## SCOTTISH PLANNING POLICY

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement. SPP, paragraph 6 reads: "Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged". Paragraph 7 reads: "... developers should ensure that appropriate and proportionate steps are taken with communities ..."

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.

Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.



The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: "... applicants should provide good quality and timely supporting information that describes ... the implications of the proposal". The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.

At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.





Dear Sir/Madam

## BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

I am a resident of Torry and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

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Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.



## COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

## PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk



to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or



would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. These statements are incorrect. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

## **VISUAL APPEARANCE**

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on



this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas - we need to have accurate illustration and confirmation of these before any permissions are granted.

## **IMPACT ON NATURE**

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area. Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous.



The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them.

Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them.

Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

### **ENVIRONMENTAL IMPACT**

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.

In order to meet the requirements of the Water Framework Directive (2000/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.



## NUISANCES CAUSED BY THE DEVELOPMENT

### Noise

The current harbour works 24/7 and there noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay?

### Smell and fumes

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either.

It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a "barrier" effect created by the River Dee which "traps" odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board's EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

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The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like to ask is there a reason why they need to be so high.



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If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

#### **CLOSING REMARKS**

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30



**Wilma Henderson**

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**From:** Mr Charles McGregor [REDACTED]  
**Sent:** 06 December 2015 21:54  
**To:** PI  
**Subject:** OBJECTIONS TO THE BAY OF NIGG PLANS

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I hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

#### PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour. Road safety is already an issue on the length of St Fittick’s Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour “rat-runners”, but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident. During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this



will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

#### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015

#### COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

#### VISUAL APPEARANCE

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas – we need to have accurate illustration and confirmation of these before any permissions are granted.

#### IMPACT ON NATURE

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area.

Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a



small impact on salmon migration patterns could be disastrous.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them.

Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them. Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

#### ENVIRONMENTAL IMPACT

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.

#### SCOTTISH PLANNING POLICY

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: "Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged".

Paragraph 7 reads: "... developers should ensure that appropriate and proportionate steps are taken with communities ..."

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process.

There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.

Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: "... applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".

The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.

At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.



**Trudie Leask  
185 Victoria Road  
Torry  
Aberdeen  
AB11 9NE**

**Planning and Sustainable Development  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB**

**11 December 2015**

**Dear Sir/Madam**

**ABERDEEN HARBOUR DEVELOPMENT, NIGG BAY, ABERDEEN**

**I wish to raise an objection to the above development.**

**No Benefits for Torry**

**Barton Willmore and the harbour board state this is a great asset that will bring opportunity and regeneration to the local community but despite attending 2 exhibitions and 1 of the meetings and asking at each one for the details of these opportunities and regeneration plans not once have I been given a single answer to that question and feel this statement has no depth to it and has simply been put in to try and fool the Torry community against the negative impacts of the project. I feel Torry is seen as seen as a community that may not object as much as other areas.**

**In Barton Willmore's initial document comparing the sights of Footdee to Nigg Bay it states "although North Beach offered greater scope to create the required berthing the development of Footdee offers little in the way of community benefit and should be rejected as it would generate significant opposition from the public."**

**Traffic**

**The increase on traffic in Victoria Road will be horrendous. There are already numerous heavy lorries thundering up and down this residential area already without adding to this.**

**The council have advised as this is a major access road for emergency services they cannot introduce traffic calming measures.**

**Barton Willmore say their intention is to direct traffic onto the coastal road but the intention of the Queen Elizabeth Bridge was to direct traffic onto Wellington Road and not through Torry so as they say the world is full of good intentions that never happen. A**



report I obtained from Police Scotland under the Freedom of Information (Scotland) Act 2002 states there have been 9 accident on Victoria Road in the last 24 months – most likely the most on any residential road in Aberdeen city.

Also we have Wellington Road and Market Street 2 of the roads which already have the worst air pollution in Scotland.

This is a residential area and the road is dangerous enough without introducing further traffic and fumes.

**Environment Impact.**

We will lose the Dolphins. The blasting, dredging and general work will drive them away. The Dolphins bring people to the area that would normally never come here. A chance to see Torry in a different and positive light. This will be lost.

At a meeting held in the summer by the council locals wanted facilities installed for these visitors. What are they going to come and see now dredging and blasting?

Add to this plants, fish and other marine life that will be lost. Many of these being rare species

Green space is also going to disappear – parts of Walker Park, St Fitticks Park and Balnagask Golf Course are all going. Some for the period of development, some for good. Is this necessary? Surely development could have taken place elsewhere and have been floated in.

The beautiful views over the Bay if Nigg will be removed and replaced by a concrete jungle surrounded by 9 feet high fences and 81 feet high lighting.

I don't see how the removal of green space from an area where a great many people stay in flats with little or no garden space as a benefit or the removal of the visitors we get to the area brought in by the Dolphins.

**Waste Water Works**

The Community Council have also worked hard to get rid of the Torry stench but there is concern all the dredging and drilling could cause damage to the ancient sewage pipe I see nothing put in place to protect this so more months of stench for the community resulting in health problems.

**House Prices**

With 19 months of blasting and dredging which appears from the plans to be continuous and not contained within certain hours and the possibility of pollutants from the building process and the decommission. The increase in traffic. The huge development right on our doorstep. The loss of green space and the harbour board taking over the full Torry coastline are all detrimental to the area and are certain to decrease the value of property.



### Marketing Images and Harbour Activity

The harbour board have tended to market this development very much for luxury cruise ships. Only when questioned at their presentations or exhibitions do they say yes it's a working harbour it's for everything. I believe this cruise ship marketing has been a bit false and misleading when in reality cruise ships are likely to make up only 2% of the harbour traffic. Decommissioning is one of the things it will be used for. This can bring radioactive and cancerous materials. Surely the location of the harbour so near housing for this type of activity is completely wrong. The cruise ships being used as the main focus on the marketing has been misleading

### Harbour Communication

The harbour board website states "strong ethos of communication with stakeholders including local residents as residents have a crucial role to play in guiding Aberdeen Harbour forward."

If this is the actual case why was none of the posters or none of the literature regarding the development on the Harbour Board website in another language. Torry has a huge amount of east European residents so how did the Harbour Board communicate with them over the development? There was also no posters other than one in the Library on the council run exhibition or leaflets drops locally advising about any of the meetings. Not everyone listens to the local radio or has access to the Internet.

I feel the strong ethos of communication has not been fulfilled

Also I must raise the point that when I attended the council run exhibition I was extremely disappointed to be told by the older woman Council representative that this was simply a going through the motions exercise as it was a national development and had already been decided and the purpose of the council exhibition was simply to let people object to the details of the scheme rather than the scheme itself. This was obviously false information and I'm disappointed the council sent a representative to the community so unaware of the facts and felt that was acceptable on such a major development.

Torry has always been used as a dumping ground – old Torry was demolished to make way for a harbour development in favour of allowing Footdee to remain intact, we have a waste water plant, a planned incinerator and now another planned industrial site will surround the areas remaining coastline. The initial study identified Footdee equally if not more preferable to Nigg Bay other than the residents would complain more. I'm sure the cruise ship market the harbour board are so desperately soliciting would much rather welcome stepping off the ships to the quaint homes of Footdee than the welcome of the smelly Waste Water plant in Torry.

In my opinion Torry has too much to lose and nothing to gain from this development.



**Yours faithfully**

[REDACTED]

**TRUDIE LEASK**





**From:** Matthew Norrie [REDACTED]  
**Sent:** 14 December 2015 11:24  
**To:** ms.marinelicensing@scotland.gsi.gov.uk; harbourorders@scotland.gsi.gov.uk; PI  
**Subject:** Objection to Proposed harbour development at Bay of Nigg, Aberdeen

Dear Sir/Madam

#### BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

I am a resident of Torry and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

#### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper (\* see details below) provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates. The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015

#### COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the



bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

#### PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What



mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse? Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. These statements are incorrect. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

#### VISUAL APPEARANCE

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community. There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas - we need to have accurate illustration and confirmation of these before any permissions are granted.

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The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them.

Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them.

Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.



## ENVIRONMENTAL IMPACT

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.

In order to meet the requirements of the Water Framework Directive (200/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.

## NUISANCES CAUSED BY THE DEVELOPMENT

### Noise

The current harbour works 24/7 and there noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay?

### Smell and fumes

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either.

It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a "barrier" effect created by the River Dee which "traps" odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board's EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

### Lights

The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like to ask is there a reason why they need to be so high. Could lighting be confined to selected, active areas of the harbour rather than being "always on"?

Regards

Matthew Norrie  
133 Abbey Road  
Torry  
Aberdeen  
AB11 9QB



Miss Yvonne F Doughty  
139 Farquhar Road  
Torry  
Aberdeen  
AB11 8SJ

Aberdeen City Council  
Planning & Sustainable Development  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen

14.12.15

Dear Sir/Madam,

**BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT**

I am a resident of Torry and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

**1.0 NEEDS OF THE AREA HAVE NOT BEEN FULLY CONSIDERED**

There is limited open green space in Torry that is accessible to the public. The health of Torry residents has been shown to be worse than in many other areas of the city – this development will not help this and there is a lot of research evidence that indicates that accessible green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and it's surrounding area provides a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have it's own large park or similar facility. The bay is the only area in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and



what land could be at potential risk in the future this has not be clearly communicated by the harbour board. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

If this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015

## 2.0 INCOMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if a new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the local population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

## 3.0 PROVISION OF SUITABLE ACCESS AND TRANSPORTATION – SAFETY RISKS

I am very worried about the additional traffic that will be created both during the construction and during the operation of the proposed new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road and will become critical as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour traffic, but also frequently used by pedestrians and people accessing the golf course. If this



development goes ahead, many pedestrians, who would have walked to the Bay of Nigg, could start to use this route for walking to the river/coast which along with the increased traffic, significantly increases the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, there is no way that HGVs should be permitted to use the residential streets in Torry. Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will increase the safety risks for visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity, according to Aberdeen City Council; if traffic is routed this way, as suggested by the Harbour Board, this could well lead to gridlock and further safety risks.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has recently been completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Traffic travelling to and from the proposed Harbour will only add to these congestion problems and further increase the safety risk.

During construction and operation there has to be strict policing of the area to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips



undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open fails, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

#### 4.0 VISUAL APPEARANCE

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas – we need to have accurate illustration and confirmation of these before any permissions are granted.

#### 5.0 IMPACT ON NATURE

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area.



Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them. Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them.

Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

## 6.0 ENVIRONMENTAL IMPACT

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – this is unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.



## 7.0 NUISANCES CAUSED BY THE DEVELOPMENT

### 7.1 Noise

The current harbour works 24/7 and there is noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay ?

### 7.2 Smell and fumes

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either.

It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a "barrier" effect created by the River Dee which "traps" odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board's EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

### 7.3 Lights

The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like to ask is there a reason why they need to be so high. Could lighting be confined to selected, active areas of the harbour rather than being "always on"?

## 8.0 VIEW OF STATUTORY AND OTHER CONSULTEES

There is an old information board in the Bay of Nigg car park, erected by Aberdeen City Council and several partner organisations. Part of this sign 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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

## 9.0 SCOTTISH PLANNING POLICY

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: "Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged". Paragraph 7 reads: "... developers should ensure that appropriate and proportionate steps are taken with communities ..."

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.

Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.



Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: "... applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".

The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.

At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on



the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

Yours Faithfully

A solid black rectangular redaction box covering the signature of Yvonne Doughty.

Yvonne Doughty



PI

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**From:** john webb [REDACTED]  
**Sent:** 14 December 2015 12:23  
**To:** PI; harbourorders@scotland.gsi.gov.uk  
**Cc:** Maureen.Watt.msp@scottish.parliament.uk; callum.mccaig.mp@parliament.uk  
**Subject:** Proposed Harbour in Nigg Bay, Aberdeen: Torry Resident Response (14th December 2015)

Dear Sir/Madam,

Please find my response detailed below.

Note; It has been copied to both the local MSP and MP.

Please acknowledge receipt of this response.

Thank you.

Yours faithfully,

John Webb

13 Morven Place, Torry, Aberdeen AB11 8EU

**For the attention of: *Aberdeen City Council and Transport Scotland***

14<sup>th</sup> December 2015

13 Morven Place  
Aberdeen  
AB11 8EU

Dear Sir/Madam

**BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT**

I am a permanent resident of Torry and would like to **object** to the proposal to build a new harbour in the Bay of Nigg Aberdeen.

A summary of the reasons for objecting to the proposals are listed below:

**NEEDS OF THE AREA**



There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent numerous research papers provide convincing evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people, which cannot be replaced. Unlike many other areas of the city, Torry does not have its own large landscaped/serviced park or similar facility.

It should be noted that the proposed “land take” associated with this development seems to have been creeping further and further up St Fittick’s Road. **(unacceptable)**

The community needs to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not be clearly communicated. Indeed, the so-called ‘Public consultation’ events only showed the possibility of minor changes at the existing T-junction. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area. The so-called ‘consultation’ events were therefore misleading. **(unacceptable)**

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry’s green space, such as the recently ‘prettified wetlands’ and in close proximity to Tullos Primary School.

Many years ago there was a “*Planning for Real*” event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) - not more industry. Have the lessons from this exercise not been learned (or perhaps, just conveniently forgotten?).

I am not wholly against all development, but am against development that I consider unsustainable, disproportionate and will act to further degrade the environment in Torry. For example, I fully support the Greyhope Bay project, which envisaged a visitor centre to view the dolphins with an attached coffee shop.

This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry and the prospect of the industrial squalor of East Tullos Industrial Estate extending down to the sea.

The Social Survey suggests very strongly that few – if any of the permanent residents of Torry are currently employed by AHB. The development proposal contains nothing to suggest that this situation is likely to alter. **(unacceptable)**

## **IMPACTS ON ACCESS AND TRANSPORTATION**

I am very worried about the additional traffic that will be created both during the construction and during the operation of the proposed harbour.

The applicant has failed to confirm whether the nearby roads will be closed during construction **(unacceptable)**

Road safety is already an issue on the length of St Fittick’s Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter-width road, already heavily used by HGVs and rush hour “rat-runners”, but also frequently used by pedestrians and people accessing the golf course. If the development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident. **(unacceptable)**



During construction, a large number of HGVs will likely use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example; a large/heavy vehicle damages the bridge? **(unacceptable)**.

Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? Why is there no statement that harbour HGVs would NOT be permitted to use any of the residential streets in Torry? **(unacceptable)**

Also, these additional HGVs will pass close to the already degraded Doonie's Farm. Many families frequent this facility, and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children. **(unacceptable)**

Hareness Roundabout is already at capacity according to Aberdeen City Council (ACC)– if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock. **(unacceptable)**

Wellington Road is already very congested and has some of the poorest air quality in Scotland. A large number of additional residences are being built at its southern end in the Cove area, which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell, which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems. **(unacceptable)**

AHB has also made a number of unsubstantiated and exaggerated claims re cruise ships. **(unacceptable)**. Since when do large cruise ships require a harbour/berth? Why would they divert to a place like Aberdeen? In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. To where? Which routes would they take - the same routes as the HGVs? This would carry the same risks to the Coast Road infrastructure as described above. **(unacceptable)**

Many of the early 'visualisation' photos suggested that ferries would also use the new harbour. The possible justification for a further ferry point is not currently known **(unacceptable)**. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing noise, pollution and the risk of an accident? **(unacceptable)**

AHB also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for ~18 months. This is **completely unacceptable** as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

Within the EIA it's stated that Greyhope Road is not known to flood and that there is no history of landslides. **These statements are incorrect**. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres along from the ruined bothy) there was a large landslide at around the same time. **(unacceptable)**

I am very concerned that as AHB intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. **(unacceptable)**



The current EIA fails to consider the impact of 19+months of blasting on the Torry Community and what monitoring and mitigation/compensation arrangements would be in place. **(unacceptable)**

#### **VISUAL AMENITY**

There will be considerable permanent impacts on the visual amenity of the area. Views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected. **(unacceptable)**

In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. **(unacceptable)** I am very concerned about the effect this will have on this vulnerable site.

The scale of this development is very large - it takes up virtually all of the bay. The true scale of the development has not been accurately reflected in much of the glossy literature produced by the harbour board **(unacceptable)**.

The bay is one of the last natural green spaces in a densely-populated area, and this harbour development will result in our residential community being almost completely surrounded by industry squalor, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/lay-down areas, further disadvantaging the local community.**(unacceptable)**

There appears to be little information on landscaping proposals or how the AHB propose to reinstate the temporary construction/lay-down areas.**(unacceptable)**

The local community should be fully consulted on an accurate illustration and confirmation of these before the application is fully considered and determined.

#### **IMPACTS ON LOCAL NATURE AND ASSOCIATED VALUES AND SERVICES**

The EIA currently fails to adequately assess the risks to the Dee SAC and wildlife. The sections re Atlantic salmon (a **Public resource**) are notably bereft of credible data and analysis. Indeed, it is clear that the applicant's agents have deliberately not consulted experts in the fields of adult salmon behaviour and underwater noise impacts on their migration. **(unacceptable)**. (Note: The local Fishery Board/Trust do not currently have the required level of expertise).

The EIA currently fails to address the potential issue of Atlantic salmon behaviour in relation to the proposed harbour space and the associated breakwaters. **(unacceptable)**

NOTE: *Transport Scotland* has so far declined to acknowledge a request for the release of details of the underwater noise monitoring associated with the recent blasting works at the new Forth Road Crossing (River Forth SAC).

See the link <https://www.st-andrews.ac.uk/news/archive/2012/title,95824,en.php>

The outcomes of meetings between the applicant (and it's agents) and the Dee District Salmon Fishery Board (DDSF) are not a matter of Public record. **(unacceptable)**

Volume 4, page 107 it's stated that "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". **(unacceptable)** Note: The deliberate disturbance of Bottle-nosed dolphins is



an offence.

It is worth noting that the dolphins have proved to be a positive asset for Torry, with the Dolphinwatch program organised by the RSPB acting as a showcase for the area.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging/construction/operation would reduce their access to food sources and moulting habitat. **(unacceptable)**

Evidence of otters has also been found in the bay according to the EIA. Note: The deliberate disturbance/disruption of otters is an offence.

Three rare plants of National importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens all these plants. There should be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the exploratory drilling works and associated vehicle movements undertaken in the bay this summer. **(unacceptable)**

## ENVIRONMENTAL IMPACT

Two highly polluted burns discharge into Nigg Bay. The statement in the EIA that raw water quality data for both burns is 'unavailable' is **grossly misleading**, because SEPA has been monitoring both watercourses for many years. **(unacceptable)** The possibility that this data and information is being deliberately withheld is **completely unacceptable**.

The range and mobility of highly toxic materials buried in the former ACC dump (including known radioactive sources) and in soils at the former BG gas works (including known carcinogens) is not currently known. **(unacceptable)**

The data presented on the two burns in the EIA appears to be inconsistent with SEPA's classification and incomplete – I consider this **unacceptable**. In addition, the BOD is quoted in some tables as ">5": again, this lack of robust data is **unacceptable**.

The current refusal of SEPA to release all of the existing soil/water contaminant data associated with the polluted watercourses entering Nigg bay is **completely unacceptable**.

Dredging to create the harbour may encourage "backflow" of material from nearby outfalls that are rich in organic material. This could result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. **(unacceptable)**

The EIA currently fails to demonstrate robust modelling having been carried out on the potential build up of pollutants in the new harbour (e.g. from the East Tullos Burn) and the possibility of significant anaerobic processes developing. **(unacceptable)**

In order to meet the requirements of the Water Framework Directive (2000/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. The EIA has failed to prove beyond reasonable doubt that the proposed harbour would not have a negative effect on water quality – suggesting that it would be non-compliant with the objectives of this directive and River Basin Management Planning. **(unacceptable)**



## **PUBLICALLY STATED VIEWS OF STATUTORY AND OTHER CONSULTEES**

There is an information board in the Bay of Nigg car park, erected by Aberdeen City Council (ACC) and several partner organisations. Part of the sign 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.*

Accordingly, any support of the proposed development by ACC would constitute an obvious contradiction of this statement. **(unacceptable)**

## **SCOTTISH PLANNING POLICY**

The application is not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement. **(unacceptable)**

SPP, paragraph 6 reads: *"Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged"*. Paragraph 7 reads: *"... developers should ensure that appropriate and proportionate steps are taken with communities ..."*

To date, the 'consultation' process has been minimal in the extreme – and dominated by a concerted program of cynical glossy 'spin' and general misinformation. **(unacceptable)**

Many Torry residents continue to be unaware of the plans and their scale. **(unacceptable)**

Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language. **(unacceptable)** Blatant ignorance of - or discrimination against this section of the local population is **completely unacceptable** and should be addressed as a matter of urgency.

No leaflet drop has been carried out to local homes – I consider this **unacceptable** for a project estimated to cost £320 million. (Note: Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste incinerator) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.)

Aberdeen Harbour Board has also failed to keep pre-registered Torry residents informed of developments as previously agreed. **(unacceptable)**

Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals. **(unacceptable)**

Concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the AHB chose not attend in person but submitted a brief statement instead. **(unacceptable)**

No member of AHB has yet presented themselves for questioning to the local community. **(unacceptable)**. The Board continues to hold its AGM in the sumptuous luxury of the 5- star Marcliffe Hotel in the West End of the city. **(unacceptable)**



SPP Paragraph 28 reads: *"The aim is to achieve the right development in the right place; it is not to allow development at any cost"*.

The true economic, social and environmental motivations underpinning the proposed harbour development are not currently known. **(unacceptable)**

Recent developments suggest that contrary what has been claimed by the applicant, the proposed harbour may in fact be used for 'dirty activities' including decommissioning work and a large domestic/industrial waste transfer 'hub'. The possibility that the nearby St. Fittick's park and playing fields will also be used for further spread of the East Tullos industrial squalor cannot be discounted. **(unacceptable)**

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard. **(unacceptable)**

SPP Paragraph 35 reads: *".. applicants should provide good quality and timely supporting information that describes ... the implications of the proposal"*.

The highly sanitised 'visualisation' images of the proposed development that have been circulated in the local press are in my view, misleading (and city council planning officials have the same view according to an article in the *Evening Express*). They seem to aimed at deliberately disguising the true use and scale of the development, and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc). **(unacceptable)**

This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The EIA was only made publicly available in early November, so the public no more the the statutory minimum of 42 days to examine it. **(unacceptable)** As this document is four volumes and is estimated to weigh 25kg, I feel that this is **unacceptable**.

At the October meeting of **Torry Community Council**, it was recommended that AHB arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. **(unacceptable)**

How do people know all the potential implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the proposed development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: *"Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."*

Torry is currently almost completely encircled by Wellington road, the railway/STW and the existing harbour's boundary security fence. If this development goes ahead it will have a disproportionately negative impact on the small amount of remaining accessible natural space in the community. I feel that this is in direct contravention of Paragraph 230. **(unacceptable)**

## CLOSING REMARKS

Torry residents and city planners are currently forced to speculate about many important aspects of the proposed development. In particular, the relationship between the new waste 'sorting' centre at Doonie's farm; the proposed incinerator, what actually constitutes 'decommissioning' work and the proposed new harbour. It also raises serious questions as to why Torry's children will in future be forced to attend a school located so far away from the area? This is completely unacceptable.



**Against this background, until the current serious gaps in the data and information are addressed (i.e. a full and suitably detailed EIA is submitted) I am forced to object to the proposed development and recommend that ACC planner's consideration of this application be suspended on the basis of a lack of **appropriate assessment and a systematic failure to consult the local community appropriately.****

John Webb  
13 Morven Place, Torry.



**Against this background, until the current serious gaps in the data and information are addressed (i.e. a full and suitably detailed EIA is submitted) I am forced to object to the proposed development and recommend that ACC planner's consideration of this application be suspended on the basis of a lack of **appropriate assessment and a systematic failure to consult the local community appropriately.****

John Webb  
13 Morven Place, Torry.



**From:** Simon mclean [REDACTED]  
**Sent:** 14 December 2015 19:44  
**Subject:** Bay of Nigg Harbour proposal planning objection

Dear Sir/Madam

**BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT**

*As a Torry resident, a recently elected member of the Torry community council and someone in a media role; I have found the information in the guise of consultation for the proposal to change the Bay of Nigg questionable.*

*I did not receive nor would it appear any leaflets to the local population (local being Torry; the population being more affected) – speaking to people while campaigning for the Torry community council election; few people knew about the plans – those who commented generally thought it was luxury cruise liners promoting tourism or are against the project for different reasons.*

*The economic argument given favours the harbour boards interests in the main. The plan focuses on the alleged anticipated activities at the proposed Nigg harbour, tacitly mentioning the latter infrastructure changes – such as the proposed new road from Nigg harbour to East Tullos industrial estate. Who benefits and who pays? I have concerns that the public are subsidising narrow interest and 'best value' is not being met for the public either financially nor indeed social-economically e.g. traffic and pollution onto the public especially residents of Torry.*

*Local City councillors were surprised of the loss of Walker Park when mentioned at the November 2015 Torry Community Council meeting; again I wonder what, when and to whom the information has been given during the process.*

The communication carried out would favour limited planning objections while claiming to have 'consulted' on the planning matter.

Below are further points that I raise to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen:

**NEEDS OF THE AREA**



There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The “land take” associated with this development seems to have been creeping further and further up St Fittick’s Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry’s green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

*\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015*

## **COMPATIBILITY WITH EXISTING USES**



The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

## **PROVISION OF SUITABLE ACCESS AND TRANSPORTATION**

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV



movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. These statements are incorrect. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December



2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

## **VISUAL APPEARANCE**

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas – we need to have accurate illustration and confirmation of these before any permissions are granted.

## **IMPACT ON NATURE**

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are displaced for the duration of construction (three years) there is a possibility that



they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area.

Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them.

Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them.

Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

## **ENVIRONMENTAL IMPACT**

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.

In order to meet the requirements of the Water Framework Directive (200/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it



could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.

## **NUISANCES CAUSED BY THE DEVELOPMENT**

### **Noise**

The current harbour works 24/7 and there noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay?

### **Smell and fumes**

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either.

It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a “barrier” effect created by the River Dee which “traps” odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board’s EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

### **Lights**

The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like



to ask is there a reason why they need to be so high. Could lighting be confined to selected, active areas of the harbour rather than being “always on”?

## **VIEW OF STATUTORY AND OTHER CONSULTEES**

There is an old information board in the Bay of Nigg car park, erected by Aberdeen City Council and several partner organisations. Part of this sign 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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

## **SCOTTISH PLANNING POLICY**

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: “Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged”.

Paragraph 7 reads: “... developers should ensure that appropriate and proportionate steps are taken with communities ...”

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.



Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: ".. applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".

The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.



At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

## **CLOSING REMARKS**

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30 years, this seems an incredibly short active lifespan when compared to the longevity of the Harbour Board. I would have thought that they of all people would have avoided such a large development with such a limited lifespan.

I am surprised that the harbour is planned to withstand a 1 in 100 year storm event. As recent events in Cumbria have shown, they have experienced two "1 in 100 year" events in just 10 years. With climate change now widely accepted I would have thought that a much more robust construction would have been recommended.

Various sites of archaeological interest have been identified both on and offshore in the Bay. I would expect that these be fully catalogued and documented before they are lost forever to construction.

I was disappointed with the "Socio Economics" chapter of the EIA. There appears to have been very little work done on how locals use the bay, instead the chapter seems to focus on non-local, "formal" visitors to the area (for example many informal visitors come to the bay to birdwatch – as the area is renowned for its passage migrants – and to spot dolphins). I feel this chapter does not reflect a true picture of how the bay is utilised by locals and informal visitors and to me this is a



glaring omission in this report. Sadly, it seems that more attention has been given to the animals in the bay, rather than the humans who will have to live next to this development.

Yours,

Simon McLean



**From:** [REDACTED]  
**Sent:** 14 December 2015 22:20  
**To:** ms.marinelicensing@scotland.gsi.gov.uk; harbourorders@scotland.gsi.gov.uk; PI  
**Subject:** Objection to proposed Bay of Nigg, Aberdeen harbour development

**Ground Floor Right Flat  
239 Victoria Road  
Aberdeen AB11 9NQ**

Dear Sir/Madam

#### **BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT**

I am a resident of Torry and would like to object in the strongest possible terms to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

I think it is highly misleading to call this development a "harbour expansion" as this is an entirely NEW harbour proposed for what is a much-valued natural bay.

Some local people are of the opinion that the attractive pictures of the development (which include lots of cruise ships) produced by Aberdeen Harbour Board are simply to deflect from the fact that this will be an industrial harbour and a scrapyards for the North Sea with the aim being to re-locate the "dirtier" work out of the current city centre harbour.

#### **NEEDS OF THE AREA**

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

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The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

I would also like to highlight an inaccuracy in the EIA, Volume 3, Technical Appendix 1-E, page 53, paragraph 5.206. It's stated that the nearest Balnagask residences are "approximately 500m" from the development boundary. Using the map supplied by Aberdeen Harbour Board in Volume 2, Chapter 3: Description of the Development (page 3-3) the boundary appears to be approximately 300m from the nearest houses in Pentland Crescent, which seems highly significant in terms of disturbance from noise, vibration, light etc and also the potential health risks from dust etc.

## **COMPATIBILITY WITH EXISTING USES**

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed



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Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.



Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

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During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. These statements are incorrect. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also,



just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

## **VISUAL APPEARANCE**

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas – we need to have accurate illustration and confirmation of these before any permissions are granted.

If we are to lose this green space to heavy industry there MUST be guaranteed, commensurate investment in leisure facilities for local people. If the decision is to approve this development, then this guarantee must form part of the conditions of granting approval.

## **IMPACT ON NATURE**

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if



the dolphins are displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area.

Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them.

Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them. The otter information in the EIA seems scant and I recommend that this be strengthened in order to evaluate accurately the potential impact on these mammals.

Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

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At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.



In order to meet the requirements of the Water Framework Directive (200/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.

## **NUISANCES CAUSED BY THE DEVELOPMENT**

### Noise

The current harbour works 24/7 and there noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay?

### Smell and fumes

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There is an old information board in the Bay of Nigg car park, erected by Aberdeen City Council and several partner organisations. Part of this sign 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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

## **SCOTTISH PLANNING POLICY**

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: "Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged".

Paragraph 7 reads: "... developers should ensure that appropriate and proportionate steps are taken with communities ..."

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.



Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: "... applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".

The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.



At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

#### **IF PERMISSION IS GRANTED**

In the event of permission being granted for this development I would recommend the following non-negotiable conditions. These are to ensure that Torry does not become a "dumping ground" for an unpleasant harbour facility used by heavy, polluting industry as I would consider this highly inappropriate in a densely-populated area:

1. Waste (domestic, industrial or other) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
2. Incinerator ash (flue or otherwise) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
3. That no vehicle traffic exceeding 5 tonnes (axial weight) associated with the new harbour be permitted to use St Fittick's road or the coastal road (north) to Torry.
4. No recreational land belonging to ACC or otherwise designated as 'Public land' will be developed as part of the project.
5. No breaking or similar decommissioning-related work will take place on the site.
6. No part of the Harbour Board's property (between the existing South and North Breakwaters) can be developed for the purposes of office accommodation for third parties, leisure facilities, conference, hotel and recreation services (including restaurants), public and private parking services and residential accommodation.



7. No part of St Fittick's Park or the adjoining playing fields/former school land will be developed for industrial, storage or marine decommissioning purposes.

## CLOSING REMARKS

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30 years, this seems an incredibly short active lifespan when compared to the longevity of the Harbour Board. I would have thought that they of all people would have avoided such a large development with such a limited lifespan.

I am surprised that the harbour is planned to withstand a 1 in 100 year storm event. As recent events in Cumbria have shown, they have experienced two "1 in 100 year" events in just 10 years. With climate change now widely accepted I would have thought that a much more robust construction would have been recommended.

Various sites of archaeological interest have been identified both on and offshore in the Bay. I would expect that these be fully catalogued and documented before they are lost forever to construction.

I was disappointed with the "Socio Economics" chapter of the EIA. There appears to have been very little work done on how locals use the bay, instead the chapter seems to focus on non-local, "formal" visitors to the area (for example many informal visitors come to the bay to birdwatch – as the area is renowned for its passage migrants – and to spot dolphins). I feel this chapter does not reflect a true picture of how the bay is utilised and valued by locals and informal visitors and to me this is a glaring omission in this report. Sadly, it seems that more attention has been given to the animals in the bay, rather than the humans who will have to live next to this development.

Yours faithfully

Lynn Thomson



**To:** ms.marinelicensing@scotland.gsi.gov.uk[ms.marinelicensing@scotland.gsi.gov.uk];  
harbourorders@scotland.gsi.gov.uk[harbourorders@scotland.gsi.gov.uk]; PI[PI@aberdeencity.gov.uk];  
**Cc:** [REDACTED]  
**Subject:** Bay of Nigg Harbour Development - Objections  
**Sent:** Mon 12/14/2015 11:09:31 AM  
**From:** STEWART, Zoe (WGPSN)  
signatures=0  
X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 kscore.is\_bulkscore=0  
kscore.compositescore=1 compositescore=0.9 suspectscore=0 malwarescore=0  
phishscore=0 bulkscore=0 kscore.is\_spamscore=0 rbsscore=0.9 spamscore=0  
urlsuspectscore=0.9 adultscore=0 classifier=scan\_limit adjust=0 reason=mlx  
scancount=1 engine=8.0.1-1507310007 definitions=main-1512140182  
X-Mailcontrol-Inbound:  
zYO4N58ZLS4Af8HGg0xtLa1Yb8XQ39g4PIGC25PPYxnFBpWTVNgmlNiw7UuZQPMU  
X-URLSB-Wrapped: false  
X-Scanned-By: MailControl 44278.411 (www.mailcontrol.com) on 10.65.0.115  
Return-Path: prvs=879001ccec=zoe.stewart@woodgroup.com  
X-MS-Exchange-Organization-AuthSource: MSEXCH002.acc.gov.uk  
X-MS-Exchange-Organization-AuthAs: Anonymous  
**Categories:** Misc,  
**Importance:** High

Good Morning,

I wish to object to the Bay of Nigg Harbour development, my reasons for this are attached.

I am a proud member of the Battle for the Bay of Nigg committee, born in Torry and most of my family still live there, I believe the Bay of Nigg is part of my heritage and I do not wish to see this destroyed.

Sincerely

Zoe Stewart



### **More suggestions for objection letters**

I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that a construction site (which is expected to generate a lot of dust) is to be sited next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction areas have been recently planted with native trees.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30 years, this seems an incredibly short active lifespan when compared to the longevity of the Harbour Board. I would have thought that they of all people would have avoided such a large development with such a limited lifespan.

Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. From personal knowledge of the site, I beg to differ on both these points. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on



the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

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In previous documentation, there has been mention of ferries using the new harbour, however there is no mention of these in the EIA, as far as I can see. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it.

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## **NEEDS OF THE AREA**

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

*\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015*

## **COMPATIBILITY WITH EXISTING USES**

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact



Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

#### **PROVISION OF SUITABLE ACCESS AND TRANSPORTATION**

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.



Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

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It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: "Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged".

Paragraph 7 reads: "... developers should ensure that appropriate and proportionate steps are taken with communities ..."

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.



Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

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I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: ".. applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".

The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of



urgency so that the public and councillors have a true picture of the impact of this development.

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At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.



Dear Sir/Madam

**BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR  
DEVELOPMENT**

I am a resident of Torry and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

I think it is highly misleading to call this development a "harbour expansion" as this is an entirely NEW harbour proposed for what is a much-valued natural bay.

Some local people are of the opinion that the attractive pictures of the development (which include lots of cruise ships) produced by Aberdeen Harbour Board are simply to deflect from the fact that this will be an industrial harbour and a scrapyard for the North Sea with the aim being to re-locate the "dirtier" work from the current city centre harbour.

**NEEDS OF THE AREA**

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

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The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.



The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

I would also like to highlight an inaccuracy in the EIA, Volume 3, Technical Appendix 1-E, page 53, paragraph 5.206. It's stated that the nearest Balnagask residences are "approximately 500m" from the development boundary. Using the map supplied by Aberdeen Harbour Board in Volume 2, Chapter 3: Description of the Development (page 3-3) the boundary appears to be approximately 300m from the nearest houses in Pentland Crescent, which seems highly significant in terms of disturbance from noise, vibration, light etc and also the potential health risks from dust etc.



## COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application. I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited right next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

## PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people



accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road. The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.



There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it.

The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. These statements are incorrect. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to



minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

#### VISUAL APPEARANCE

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas - we need to have accurate illustration and confirmation of these before any permissions are granted.

If we are to lose this green space to heavy industry there MUST be guaranteed, commensurate investment in leisure facilities for local people. If the decision is to approve this development, then this guarantee must form part of the conditions of granting approval.

#### IMPACT ON NATURE

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are



displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area. Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them. Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them. The otter information in the EIA seems scant and I recommend that this be strengthened in order to evaluate accurately the potential impact on these mammals. Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

#### ENVIRONMENTAL IMPACT

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for



anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as “>5”: again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.

In order to meet the requirements of the Water Framework Directive (2000/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.

#### NUISANCES CAUSED BY THE DEVELOPMENT

##### Noise

The current harbour works 24/7 and there noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay?

##### Smell and fumes

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the



Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either. It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a "barrier" effect created by the River Dee which "traps" odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board's EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

#### Lights

The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like to ask is there a reason why they need to be so high. Could lighting be confined to selected, active areas of the harbour rather than being "always on"?

#### VIEW OF STATUTORY AND OTHER CONSULTEES

There is an old information board in the Bay of Nigg car park, erected by Aberdeen City Council and several partner organisations. Part of this sign 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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

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within the local area ...”

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

#### IF PERMISSION IS GRANTED

In the event of permission being granted for this development I would recommend the following non-negotiable conditions. These are to ensure that Torry does not become a “dumping ground” for an unpleasant harbour facility used by heavy, polluting industry as I would consider this highly inappropriate in a densely-populated area:

1. Waste (domestic, industrial or other) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
2. Incinerator ash (flue or otherwise) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
3. That no vehicle traffic exceeding 5 tonnes (axial weight) associated with the new harbour be permitted to use St Fittick’s road or the coastal road (north) to Torry.
4. No recreational land belonging to ACC or otherwise designated as 'Public land' will be developed as part of the project.
5. No breaking or similar decommissioning-related work will take place on the site.
6. No part of the Harbour Board’s property (between the existing South and North Breakwaters) can be developed for the purposes of office accommodation for third parties, leisure facilities, conference, hotel and recreation services (including restaurants), public and private parking services and residential accommodation.
7. No part of St Fittick's Park or the adjoining playing fields/former school land will be developed for industrial, storage or Marine decommissioning purposes.

#### CLOSING REMARKS

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As



decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30 years, this seems an incredibly short active lifespan when compared to the longevity of the Harbour Board. I would have thought that they of all people would have avoided such a large development with such a limited lifespan.

I am surprised that the harbour is planned to withstand a 1 in 100 year storm event. As recent events in Cumbria have shown, they have experienced two "1 in 100 year" events in just 10 years. With climate change now widely accepted I would have thought that a much more robust construction would have been recommended. Various sites of archaeological interest have been identified both on and offshore in the Bay. I would expect that these be fully catalogued and documented before they are lost forever to construction.

I was disappointed with the "Socio Economics" chapter of the EIA. There appears to have been very little work done on how locals use the bay, instead the chapter seems to focus on non-local, "formal" visitors to the area (for example many informal visitors come to the bay to birdwatch – as the area is renowned for its passage migrants – and to spot dolphins). I feel this chapter does not reflect a true picture of how the bay is utilised and valued by locals and informal visitors and to me this is a glaring omission in this report. Sadly, it seems that more attention has been given to the animals in the bay, rather than the humans who will have to live next to this development.

Yours faithfully

Renée Slater  
2 Walker Place  
Torr  
Aberdeen AB11 8BQ



**From:** [REDACTED]  
**Sent:** 14 December 2015 22:23  
**To:** PI  
**Subject:** Comments on harbour plan

Dear Sir/Madam

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There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

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During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

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pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

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I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either.

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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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

#### SCOTTISH PLANNING POLICY

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: "Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged".

Paragraph 7 reads: "... developers should ensure that appropriate and proportionate steps are taken with communities ..."

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.

Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did



not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason. The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: "... applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".

The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development. The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.

At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

#### IF PERMISSION IS GRANTED

In the event of permission being granted for this development I would recommend the following non-negotiable conditions. These are to ensure that Torry does not become a "dumping ground" for an unpleasant harbour facility used by heavy, polluting industry as I would consider this highly inappropriate in a densely-populated area:

1. Waste (domestic, industrial or other) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
2. Incinerator ash (flue or otherwise) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
3. That no vehicle traffic exceeding 5 tonnes (axial weight) associated with the new harbour be permitted to use St Fittick's road or the coastal road (north) to Torry.
4. No recreational land belonging to ACC or otherwise designated as 'Public land' will be developed as part of the project.
5. No breaking or similar decommissioning-related work will take place on the site.
6. No part of the Harbour Board's property (between the existing South and North Breakwaters) can be developed for the purposes of office accommodation for third parties, leisure facilities, conference, hotel and recreation services (including restaurants), public and private parking services and residential accommodation.
7. No part of St Fittick's Park or the adjoining playing fields/former school land will be developed for industrial, storage or Marine decommissioning purposes.

#### CLOSING REMARKS

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30 years, this seems an incredibly short active lifespan when compared to the longevity of the Harbour Board. I would have thought that they of all people would have avoided such a large development with such a limited lifespan.

I am surprised that the harbour is planned to withstand a 1 in 100 year storm event. As recent events in Cumbria have shown, they have experienced two "1 in 100 year" events in just 10 years. With climate change now widely accepted I would have thought that a much more robust construction would have been recommended.



Various sites of archaeological interest have been identified both on and offshore in the Bay. I would expect that these be fully catalogued and documented before they are lost forever to construction.

I was disappointed with the "Socio Economics" chapter of the EIA. There appears to have been very little work done on how locals use the bay, instead the chapter seems to focus on non-local, "formal" visitors to the area (for example many informal visitors come to the bay to birdwatch – as the area is renowned for its passage migrants – and to spot dolphins). I feel this chapter does not reflect a true picture of how the bay is utilised and valued by locals and informal visitors and to me this is a glaring omission in this report. Sadly, it seems that more attention has been given to the animals in the bay, rather than the humans who will have to live next to this development.

Also as a dog trainer I worry about all the green space you are planning on taking away from the one area that residents have to exercise their dogs.

We already have alot of reactive dogs in the area and if you take this space away and leave these dogs to have to be walked on the street you raise the likelihood for dog incidents and possible dogs being rehomed because of it. This is a potential major problem that's being overlooked

Yours faithfully

J Butler

Torry resident

Sent from my Samsung device



PI

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**From:** [REDACTED]  
**Sent:** 14 December 2015 23:07  
**To:** ms.marinelicensing@scotland.gsi.gov.uk; ms.marinelicensing@scotland.gsi.gov.uk;  
PI  
**Subject:** OBJECTION TO BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT  
**Attachments:** OBJECTION TO BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR  
DEVELOPMENT.docx

*I would appreciate receipt of this email.*

Lesley-Anne Mulholland  
Dee Cottage  
60 Abbey Road  
Torry Aberdeen  
AB11 9PE  
Email: [REDACTED]

14/12/15

Dear Sir/Madam

#### BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

I am a resident of Torry and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

I think it is highly misleading to call this development a "harbour expansion" as this is an entirely NEW harbour proposed for what is a much-valued natural bay.

Some local people are of the opinion that the attractive pictures of the development (which include lots of cruise ships) produced by Aberdeen Harbour Board are simply to deflect from the fact that this will be an industrial harbour and a scrapyards for the North Sea with the aim being to re-locate the "dirtier" work from the current city centre harbour.

#### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper\* provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

(\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015)



The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

I would also like to highlight an inaccuracy in the EIA, Volume 3, Technical Appendix 1-E, page 53, paragraph 5.206. It's stated that the nearest Balnagask residences are "approximately 500m" from the development boundary. Using the map supplied by Aberdeen Harbour Board in Volume 2, Chapter 3: Description of the Development (page 3-3) the boundary appears to be approximately 300m from the nearest houses in Pentland Crescent, which seems highly significant in terms of disturbance from noise, vibration, light etc and also the potential health risks from dust etc.

#### COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited right next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

#### PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked



to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

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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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

## SCOTTISH PLANNING POLICY

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: “Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged”.

Paragraph 7 reads: “... developers should ensure that appropriate and proportionate steps are taken with communities ...”

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.



Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: "... applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".

The images of the development that have been circulated in the local press are in my view, misleading. They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.

At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

#### IF PERMISSION IS GRANTED

In the event of permission being granted for this development I would recommend the following non-negotiable conditions. These are to ensure that Torry does not become a "dumping ground" for an unpleasant harbour facility used by heavy, polluting industry as I would consider this highly inappropriate in a densely-populated area:

1. Waste (domestic, industrial or other) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
2. Incinerator ash (flue or otherwise) of any kind will not be permitted to be stored, stockpiled or shipped in or out of the site.
3. That no vehicle traffic exceeding 5 tonnes (axial weight) associated with the new harbour be permitted to use St Fittick's road or the coastal road (north) to Torry.
4. No recreational land belonging to ACC or otherwise designated as 'Public land' will be developed as part of the project.
5. No breaking or similar decommissioning-related work will take place on the site.
6. No part of the Harbour Board's property (between the existing South and North Breakwaters) can be



developed for the purposes of office accommodation for third parties, leisure facilities, conference, hotel and recreation services (including restaurants), public and private parking services and residential accommodation.

7. No part of St Fittick's Park or the adjoining playing fields/former school land will be developed for industrial, storage or Marine decommissioning purposes.

#### CLOSING REMARKS

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30 years, this seems an incredibly short active lifespan when compared to the longevity of the Harbour Board. I would have thought that they of all people would have avoided such a large development with such a limited lifespan.

I am surprised that the harbour is planned to withstand a 1 in 100 year storm event. As recent events in Cumbria have shown, they have experienced two "1 in 100 year" events in just 10 years. With climate change now widely accepted I would have thought that a much more robust construction would have been recommended.

Various sites of archaeological interest have been identified both on and offshore in the Bay. I would expect that these be fully catalogued and documented before they are lost forever to construction.

I was disappointed with the "Socio Economics" chapter of the EIA. There appears to have been very little work done on how locals use the bay, instead the chapter seems to focus on non-local, "formal" visitors to the area (for example many informal visitors come to the bay to bird watch – as the area is renowned for its passage migrants – and to spot dolphins). I feel this chapter does not reflect a true picture of how the bay is utilised and valued by locals and informal visitors and to me this is a glaring omission in this report.

In addition to this I do not believe that Torry would benefit economically from any such development.

Yours faithfully

Lesley-Anne Mulholland



**From:** Jan Stewart [REDACTED]  
**Sent:** 14 December 2015 22:49  
**To:** PI  
**Subject:** BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

Dear Sir/Madam

I am a resident of Torry and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

#### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and well-being of the local community. In addition, a recent research paper (\* see details below) provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates. The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people. The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area. Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School. Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?). I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015

#### COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight. For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application. I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and play park) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

#### PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident. During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fall-back plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry. Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children. Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock. Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry



and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution. During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road. The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above. There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it. The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse? Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. These statements are incorrect. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time. I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

#### VISUAL APPEARANCE

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building. The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community. There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas - we need to have accurate illustration and confirmation of these before any permissions are granted.

#### IMPACT ON NATURE

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottle nose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphin watch programme organised by the RSPB acting as a showcase for the area. Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous. The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them. Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them. Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

#### ENVIRONMENTAL IMPACT

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "back flow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete - I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable. I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken. In order to meet the requirements of the Water Framework Directive (2000/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.

#### NUISANCES CAUSED BY THE DEVELOPMENT

##### Noise

The current harbour works 24/7 and there noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be



confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay?

#### Smell and fumes

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either. It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a "barrier" effect created by the River Dee which "traps" odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board's EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

#### Lights

The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like to ask is there a reason why they need to be so high. Could lighting be confined to selected, active areas of the harbour rather than being "always on"?

I hope that you take these views into account and reconsider this development.

Kind regards,

Jan Stewart



Mrs Joyce Mckay  
30 Tullos Crescent  
Torry  
Aberdeen  
AB11 8JW

## BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

I am a resident of Torry I reside at and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper (\* see details below) provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The “land take” associated with this development seems to have been creeping further and further up St Fittick’s Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry’s green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

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### COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain



bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

#### PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

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Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children.

Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

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Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it.

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I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

#### VISUAL APPEARANCE

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced



by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas – we need to have accurate illustration and confirmation of these before any permissions are granted.

#### IMPACT ON NATURE

I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area.

Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them.

Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them.

Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

#### ENVIRONMENTAL IMPACT

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.



I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.

In order to meet the requirements of the Water Framework Directive (2000/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.

## NUISANCES CAUSED BY THE DEVELOPMENT

### Noise

The current harbour works 24/7 and there noticeable noise from this, particularly from vehicle reversing alarms and work when loading/unloading containers as well as engine noise. This is especially troublesome during the night when the noise is sufficient to waken local residents. As mitigation, I would strongly suggest working hours (both construction and operation of the harbour) be confined to daylight hours with reduced hours at weekends to give local residents some respite. In addition, I would request that robust measures be taken to minimise the amount of noise transmitted from the development – perhaps landscaping measures or improved soundproofing for homes adjacent to the bay?

### Smell and fumes

I would expect that the strictest measures be rigorously enforced to ensure that there are no smell and fumes issuing from the harbour. The people of Balnagask have had to live with the odours from the Wastewater Treatment Plant for 10 years and deserve to have a life free from unpleasant odours. This harbour should not deal in any materials that have the potential to create unpleasant odours/fumes and the harbour itself should be maintained in such a way that smell/fume nuisance is not generated there either.

It should be noted that Scottish Water on the advice of Professor Rob Jackson have recently amended their modelling systems to take account of a “barrier” effect created by the River Dee which “traps” odour and pollution in the Torry area. I do not believe that this microclimate effect has been explored in the harbour board’s EIA. If this is the case, I strongly advise that this effect is examined as a matter of urgency.

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The tower lights in the proposed development are over 80 feet high. I would expect these at the very least to be directional and dimmable to reduce disturbance to local residents. I would also like to ask is there a reason why they need to be so high. Could lighting be confined to selected, active areas of the harbour rather than being “always on”?

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There is an old information board in the Bay of Nigg car park, erected by Aberdeen City Council and several partner organisations. Part of this sign 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 hope and trust that the council keeps this particular promise about the Bay of Nigg. The bay forms an important part of our local environment and its loss would lead to the fragmentation of natural habitats.

#### SCOTTISH PLANNING POLICY

It is my opinion that aspects of this application are not in the spirit of Scottish Planning Policy (SPP) and Planning Advice Note 3/2010 Community Engagement.

SPP, paragraph 6 reads: "Such engagement between stakeholders should be early, meaningful and proportionate. Innovative approaches, tailored to the unique circumstances are encouraged". Paragraph 7 reads: "... developers should ensure that appropriate and proportionate steps are taken with communities ..."

Torry will be the area most impacted by this development. Approximately 15% of the local population does not have English as their first language, but not one document has been produced in an alternative language, effectively excluding a significant proportion of locals from the planning process. There are no statements in other languages on any of the documents advising how people can source copies in their native language either. I feel that this is discrimination against this section of the local population and should be addressed as a matter of urgency.

Many locals are unaware of the plans and their scale. No leaflet drop has been carried out to local homes – I consider this unacceptable for a project estimated to cost £320 million. Leaflet drops have recently been undertaken by Aberdeen City Council (Energy from waste plant) and Scottish Water (upgrading works at Wastewater Treatment Plant) so there is ample precedent for this.

Although the development was advertised in a local free newspaper (Aberdeen Citizen) this is not circulated in the Torry area which demonstrates a lack of consideration towards appropriate and meaningful consultation with locals.

Also, concerned Torry residents appeared on a local radio show on 4 December 2015 to talk about the Bay of Nigg (show was scheduled to last one hour). Despite being invited and given ample notice the harbour board did not attend in person but submitted a brief statement instead. I consider this lack of engagement with locals to be unacceptable.

SPP Paragraph 28 reads: "The aim is to achieve the right development in the right place; it is not to allow development at any cost".

I strongly believe that the risks of this development solidly outweigh the benefits for the local community and that our voices have not been heard. In addition, much of the economic case for this development was made when oil was over \$100 a barrel. With oil now being approximately \$40 a barrel and predicted to decrease further, I believe that the economic case needs to be revisited at the very least and revised as necessary, otherwise if this new harbour is constructed it could well be a "white elephant" and we will have lost our bay for no good reason.

The Bay of Nigg is one of the last natural, accessible green spaces in Torry. For many in the community, this development is inappropriate in its location and scale, however we have been given little opportunity to have our voices heard.

SPP Paragraph 35 reads: "... applicants should provide good quality and timely supporting information that describes ... the implications of the proposal".



The images of the development that have been circulated in the local press are in my view, misleading (and city council planning officials have the same view according to an article in the Evening Express). They seem to disguise the true scale of this development and lack detail on all the infrastructure (e.g. car parks, welfare blocks, security fencing etc) that will be associated with a new harbour. This must be rectified as a matter of urgency so that the public and councillors have a true picture of the impact of this development.

The Environmental Impact Assessment was only made publicly available in early November, so the public have the statutory minimum of 42 days to examine it. As this document is four volumes and is estimated to weigh 25kg, I feel that this is unacceptable.

At the October meeting of Torry Community Council, it was recommended that the harbour board arrange a public meeting to enable the public to fully debate the development. To date, this has not been done and I consider this a serious oversight. How do people know all the implications of these proposals without having the chance to discuss them meaningfully? I would strongly recommend that a public meeting is organised as a matter of urgency to allow a true debate on the development. I think this is a wholly proportionate response to a development costing £320 million.

SPP Paragraph 230 reads: "Development of land allocated as green infrastructure ... will not result in a deficit of that provision within the local area ..."

If this development goes ahead it will have a huge impact on the amount of accessible natural space in the community. I feel that this is in contravention of paragraph 230.

#### CLOSING REMARKS

Aberdeen Harbour Board are keen to advertise themselves as one of the oldest businesses in the world, having been founded in 1136. I therefore find it odd that they want to build a facility to hopefully/possibly attract some decommissioning work. As decommissioning work was predicted by Oil and Gas UK in 2013 to last for 30 years, this seems an incredibly short active lifespan when compared to the longevity of the Harbour Board. I would have thought that they of all people would have avoided such a large development with such a limited lifespan.

I am surprised that the harbour is planned to withstand a 1 in 100 year storm event. As recent events in Cumbria have shown, they have experienced two "1 in 100 year" events in just 10 years. With climate change now widely accepted I would have thought that a much more robust construction would have been recommended.

Various sites of archaeological interest have been identified both on and offshore in the Bay. I would expect that these be fully catalogued and documented before they are lost forever to construction.

I was disappointed with the "Socio Economics" chapter of the EIA. There appears to have been very little work done on how locals use the bay, instead the chapter seems to focus on non-local, "formal" visitors to the area (for example many informal visitors come to the bay to birdwatch – as the area is renowned for its passage migrants – and to spot dolphins). I feel this chapter does not reflect a true picture of how the bay is utilised by locals and informal visitors and to me this is a glaring omission in this report. Sadly, it seems that more attention has been given to the animals in the bay, rather than the humans who will have to live next to this development.

Yours faithfully ...





**From:** Colette Snelling [REDACTED]  
**Sent:** 15 December 2015 21:55  
**To:** ms.marinelicensing@scotland.gsi.gov.uk; harbourorders@scotland.gsi.gov.uk; PI  
**Subject:** BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

Dear Sir/Madam

#### BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

I am a resident of Torry and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. My reasons for objecting are listed below.

#### NEEDS OF THE AREA

There is limited open green space in Torry that is accessible to the public. The health of Torry people has been shown to be worse than many other areas of city – this development will not help this as there is a lot of research evidence that accessible, green spaces are beneficial to the health and wellbeing of the local community. In addition, a recent research paper (\* see details below) provides evidence that accessible, green spaces also contribute to more social cohesion and significantly lower crime rates.

The Bay of Nigg and its surrounding area provide a valuable free, accessible leisure resource for local people which cannot be replaced. Unlike many areas of the city, Torry does not have its own large park or similar facility. The bay is one of the few areas in Torry where you can get away from the hustle and bustle and hear nothing but the natural sound of the waves, rather than the noises of industry, traffic and other people.

The "land take" associated with this development seems to have been creeping further and further up St Fittick's Road. We need to be absolutely clear exactly what land will be lost and what land could be at potential risk in the future as I strongly feel that this has not been clearly communicated. Many people seem completely unaware that the golf practice area would virtually disappear and that Walker Park will be taken over as a temporary construction area.

Also, if this development goes ahead, it could open the door to further unwelcome development of the area, by strengthening the case for new roads to be built across more of Torry's green space, such as the recently-restored wetlands and in close proximity to Tullos Primary School.

Many years ago there was a "Planning for Real" event held in Torry. The overwhelming message from residents was that we needed attractions to draw people into the area (at that time an aquarium with adjacent restaurant were proposed) not more industry. Have the lessons from this exercise not been learned (or remembered?).

I am not against all development, but am against development that I consider unsustainable and disproportionate. For example, I fully support the Greyhope Bay project which envisaged a visitor centre to view the dolphins with an attached coffee shop. This seems to me to be just the kind of development that should be encouraged in the area instead of heavy industry.

\*Netta Weinstein et al "Seeing the community for the trees: The links among contact with natural environments, community cohesion and crime" Bioscience, November 2015

#### COMPATIBILITY WITH EXISTING USES

The Bay of Nigg is already used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, anglers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if new harbour goes ahead. From the Environmental Impact Assessment (prepared by the Harbour Board) little work seems to have been undertaken to establish how the area is used and viewed by the LOCAL population who will have to live next to this development. This to me is an unacceptable oversight.

For generations, people with local connections have scattered their loved one's ashes in the Bay of Nigg (the area has a strong seafaring background). Where will people pay their respects in the future when the bay is inaccessible and surrounded by nine and a half foot high security fencing? The harbour board have been asked about this previously at meetings of Torry Community Council, but have yet to provide an adequate response and this aspect does not appear to feature in their planning application.

I am concerned about the proximity of the harbour development and the construction areas to four play areas for children (the skateboard ramp, adventure playground, basketball court and playpark) in St Fittick's Community Park. Research has amply demonstrated that children are much more susceptible to air pollution than adults and I find it unacceptable that construction sites (which are expected to generate a lot of dust) are to be sited next to these play facilities. It is also disappointing to note that some of the areas earmarked for construction sites have been recently planted with native trees.

#### PROVISION OF SUITABLE ACCESS AND TRANSPORTATION

I am very worried about the additional traffic that will be created both during the construction and during the operation of this new harbour.

Road safety is already an issue on the length of St Fittick's Road from the Nigg Bay Golf Club to its north



junction with Greyhope Road as there is no pavement for pedestrians. This is a three-quarter width road, already heavily used by HGVs and rush hour "rat-runners", but also frequently used by pedestrians and people accessing the golf course. If this development goes ahead, many pedestrians who would have walked to the Bay of Nigg could instead use this route for a leisure walk to the river/coast which along with the increased traffic, significantly worsens the risk of accident.

During construction, a large number of HGVs will use three-quarter width Coast Road and have to negotiate the tight bends at the railway bridge – this will lead to further congestion, delays and potentially damage to the bridge (either from overuse or accident). What is the fallback plan if for example, the bridge is damaged by a heavy vehicle? Where will traffic be re-routed or will HGV movement be suspended until the bridge is declared safe again? For safety reasons, I would ask that no harbour HGVs would be permitted to use the residential streets in Torry.

Also, these additional HGVs will pass close to Doonies Farm. This facility is frequented by families and I feel that an increase in traffic will be detrimental to the safety of visitors to the farm, particularly young children. Hareness Roundabout is already at capacity according to Aberdeen City Council – if traffic routed this way as suggested by Harbour Board, this could well lead to gridlock.

Wellington Road is already congested and has poor air quality. A large number of additional residences are being built at its southern end in the Cove area which will exacerbate this issue. Various high-density housing has been recently completed or is planned for Torry and Abbotswell which will also make these traffic problems worse. Harbour traffic will only add to these congestion problems and I cannot see an easy solution.

During construction and operation, I would request that strict mitigation measures are employed to ensure that harbour traffic does not use residential roads in Torry, including Victoria Road.

The harbour board also claims that it wants to attract cruise ships. In the EIA, it is proposed that 40 luxury coaches would be needed to transport cruise passengers. Which routes would these take? The same as the HGVs? This would carry the same risk to the Coast Road infrastructure as described above.

There has been mention of ferries using the new harbour. I would be concerned if ferries were to use the harbour, primarily because of the additional traffic they would generate. For example, the Orkney and Shetland ferries both carry around 140 cars. Would these cars be expected to follow the same route recommended for HGVs? Or would they use the already congested residential routes through Torry, thereby increasing the risk of accident? If this harbour does go ahead, I would recommend that no passenger ferries are permitted to use it. The harbour board also propose to close Greyhope Road from Girdleness Lighthouse to the Coast Road for 18 months. I find this unacceptable as this effectively doubles the traffic using the remainder of Greyhope Road (i.e. traffic heading east then having to U-turn and head back) which is a three-quarter width road narrowing to single carriageway in places due to landslips undermining it in recent years. This will place additional stress on this already weakened road, increasing the likelihood of further serious failure. What mitigation is proposed for this? If the section of Greyhope Road left open does fail, how will people (and emergency vehicles) access the Torry Battery and the houses adjacent to the Girdleness Lighthouse?

Within the Environmental Impact Assessment it's stated that Greyhope Road is not known to flood and that there is no history of landslide. These statements are incorrect. Greyhope Road does flood - it flooded quite badly next to the Bay Of Nigg car park during storms in December 2013/January 2014 when a lot of sand, pebbles and debris were also deposited on the road. Also, just along the coastal path (about 100 metres after the ruined bothy) there was a large landslide at around the same time.

I am concerned that as the Harbour Board intend to carry out rock blasting in this area, that this could lead to further landslides and potentially destabilise this section of Greyhope Road. As blasting is planned, I expect that there will be robust seismic monitoring of nearby residences and buildings to ensure that any damage is minimised. I would also expect rigorous monitoring of properties to minimise disturbance and damage caused by vibration, whether this be during construction or operation of the harbour.

#### VISUAL APPEARANCE

There will be a considerable impact on views from Old St Fittick's Church (B-listed) and from Girdleness Lighthouse (A-listed). St Fittick's in particular will be very badly affected and I cannot see any potential to mitigate the impact of the new harbour on this iconic building. In addition, it now appears that St Fittick's will be very closely surrounded on two sides by "temporary" construction areas. I am very concerned about the effect this will have on this vulnerable building.

The scale of this development is huge - it takes up virtually all of the bay. In my opinion, the true scale of the development has not been accurately reflected in the glossy literature produced by the harbour board. The bay is one of the last natural green spaces in a densely-populated area and this harbour development will result in our residential community being almost completely surrounded by industry, congested roads and the railway. In addition, a lot of the remaining green space in Torry, including the Walker Park will be taken up by temporary construction/laydown areas, further disadvantaging the local community.

There appears to be little information on landscaping proposals or how the harbour board propose to reinstate the temporary construction/laydown areas – we need to have accurate illustration and confirmation of these before any permissions are granted.

#### IMPACT ON NATURE



I am worried about the proximity of the River Dee Special Area of Conservation as the construction noise from this development will on occasion, travel several kilometres through the water. In the EIA Volume 4, page 107 it's stated that our "bottlenose dolphin is assumed to be displaced from the immediate Nigg Bay area during the construction phase". I am concerned as if the dolphins are displaced for the duration of construction (three years) there is a possibility that they might never come back. In addition, I am concerned about the physiological effects that drilling, blasting, piling and dredging will have on dolphins and other marine mammals. The dolphins have in recent years, proved to be a positive asset for Torry, with the Dolphinwatch programme organised by the RSPB acting as a showcase for the area.

Other marine life will also be affected, for example the Atlantic salmon could have its migration disrupted which could impact on life cycle of freshwater pearl mussel colonies in River Dee. These are already critically endangered and under further pressure from filamentous algae so even a small impact on salmon migration patterns could be disastrous.

The Bay of Nigg is also a valuable resource for birds, particularly ducks. The dredging would rob them of their food sources and the disturbance caused by the construction could displace them.

Evidence of otters has also been found in the bay according to the EIA. The development of a new harbour is unlikely to have a positive effect on them.

Three rare plants of national importance grow in the bay: sea pea, oyster plant and curved sedge. This development threatens these plants. There must be a robust plan in place and this must be effectively implemented to ensure their ongoing survival. Their habitat has already been damaged by some of the ground drilling works and associated vehicle movements undertaken in the bay this summer.

#### ENVIRONMENTAL IMPACT

At the moment, two polluted burns discharge into bay, however this pollution is quickly dispersed by the waves. The construction of the breakwaters would reduce this dilution rate, therefore pollutants could build up in bay and its sediment. Also, dredging to create the harbour would encourage "backflow" of material from nearby outfalls that are rich in organic material. This would result in increased Biological Oxygen Demand (BOD) and the potential for anaerobic bacterial respiration in the harbour and the consequent production of toxic, smelly hydrogen sulphide gas. Also the data on the two burns in the Environmental Impact Assessment appears to be incomplete – I consider this unacceptable. In addition, the BOD is quoted in some tables as ">5": again, I find this lack of robust data unacceptable.

I would recommend that robust modelling be carried out on the potential build up of pollutants in the harbour and the possibility of anaerobic respiration, if this has not already been undertaken.

In order to meet the requirements of the Water Framework Directive (200/60/EC), responsible authorities must carry out their statutory functions to prevent deterioration and to improve the water environment. I would expect that this development would only be given the go ahead if it could be proven beyond reasonable doubt that the new harbour would not have a negative effect on water quality, otherwise this would appear to be non-compliant with the objectives of this directive and River Basin Management Planning.

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##### Noise

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Yours faithfully  
Colette Snelling



PI

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**From:** [REDACTED]  
**Sent:** 15 December 2015 20:50  
**To:** ms.marinelicensing@scotland.gsi.gov.uk; harbourorders@scotland.gsi.gov.uk; PI  
**Subject:** BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

Dear Sir/Madam

BAY OF NIGG, ABERDEEN - PROPOSED HARBOUR DEVELOPMENT

I live nearby on Polmuir Road and would like to object to the proposal to build a new harbour in the Bay of Nigg Aberdeen. Some of my reasons for objecting are below.

The Bay of Nigg and its surrounding area provide a valuable leisure resource for local people which cannot be replaced. I personally use the area for walking, running, surfing and fishing and feel that it is a unique and important area of Aberdeen. In particular for surfing this area is a popular and high quality spot on this stretch of coast.

The Bay of Nigg is used by ramblers, birdwatchers, paragliders, dog walkers, mountain bikers, kayakers, surfers, kite flyers etc. This area will be completely inaccessible if the new harbour goes ahead. The bay is one of the last natural green spaces in a densely-populated area.

Best regards

Erlend  
Inkster  
95 Polmuir Road  
Aberdeen  
AB11 7SJ



Doonies Farm

Coast Road

Nigg

Aberdeen

AB12 3LT

24/11/2015

Dear Sir,

I am writing to comment on the planning application lodged by Aberdeen Harbour Board, application reference 151742.

My wife and I are the tenants of Doonies Farm and we have a 15 year lease with Aberdeen City Council, commencing 2010, to operate the farm as a visitor attraction and rare breeds farm. The loss of 8.63 hectares of land to accommodate the construction of the southern breakwater and associated infrastructure will result in Doonies farm becoming a non-viable business. We will have no alternative but to cease operations and close the farm down.

Barton Willmore continually refers to the land in question as part of Loirston Country Park. I am not aware that Loirston Country Park was ever formally adopted by Aberdeen City Council but in any case, in the 22 years that I have been associated with the farm the fields have always been part of Doonies farm.

The harbour development will have the following financial consequences for our business;

1. Loss of land on which to make our winter fodder and loss of land for grazing animals. The expense of buying fodder, plus the cost of transporting it to the farm for up to 30 weeks of the year is prohibitive.
2. Loss of annual agricultural subsidy.
3. A forced reduction in the amount of livestock we can keep and subsequently a large reduction in the amount of income we can generate.

The second issue we have with the planning application concerns the proposed off road cycle path improvements as stated on page 12 of the Final Planning Statement document.

I fail to see how you can "improve" something that does not exist. There is no off road cycle path to improve. The cycle path uses the Coast Road. The creation of a new cycle track through the fields of



Doonies farm will create serious management issues for the farm. There is only an indicative plan shown but I would bring to your attention the following points;

The path appears to go through field gateways

The path appears to utilise an existing farm vehicle track.

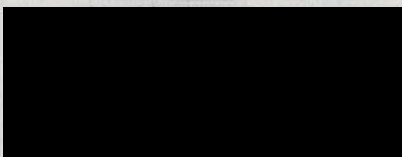
The path would cut off the water supply for livestock in the last field before the railway underpass.

The path re-joins the Coast Road at a point where there is a dip in the road as it approaches the busy junction with Hareness Road. That part of the Coast Road is often in shade due to the railway embankment and I predict that there will be a serious accident, as cyclists emerge out of the railway underpass onto the Coast Road.

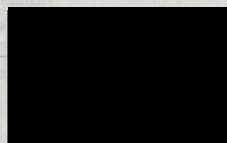
My final concern relates to the proposed resurfacing and "significant" improvements to the Coast Road (volume 2 Environmental Statement, Chapter 18, Traffic and Transport). Any disruption to vehicle access to the farm for our customers during resurfacing work will have severe financial implications for our business. Likewise any road widening along the part of the Coast Road that is adjacent to the farm fields or entrance will be detrimental to the farm ( Design Statement, Final Planning Statement 2.2). The car park is not large enough to accommodate all the vehicles at busy times and any road widening will make the situation worse. Tractor and trailer access is required to the stone barn and adjoining yard. Any loss of the concrete apron in front of the barn will mean that the tractor would have to hold up traffic in order to access the only secure building on the farm.

I trust that these concerns will be addressed and action taken that will allow Doonies Farm to continue operating for the benefit of the people of Aberdeen.

Yours sincerely,



Graham Lennox



Debbie Lennox



## Wilma Henderson

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**From:** webmaster@aberdeencity.gov.uk  
**Sent:** 03 December 2015 19:28  
**To:** PI  
**Subject:** Planning Comment for 151742

**Categories:** SmartSaved

Comment for Planning Application 151742

Name : Aberdeen Civic Society  
Address : c/o 5 Louisville Avenue  
Aberdeen  
AB15 4TT

Telephone :

Email : [REDACTED] type :

Comment : Aberdeen Civic Society supports the application for an extension to the harbour. We do have concerns about how traffic is going to be managed in the area and in this regard would wish to remain involved as proposals are firmed up.

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