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 be 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?

# NUISANÇES CAUSED BY THE DEVELOPMENT

#### 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?

#### 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.

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 furnes.

#### 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



TRUDIE LEASK

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From:				
	F	ro	m	:

Sent:

15 December 2015 20:50

To:

ms. marine licensing @scotland.gsi.gov.uk; harbour orders @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;

- 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.

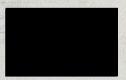
My final concern relates to the proposed resurfacing and "significant" improvements to the Coast Road (volume 2 Environmental Statement, Chapter 18, Traffic and Transport). Any disruption to vehicle access to the farm for our customers during resurfacing work will have severe financial implications for 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

From: webmaster@aberdeencity.gov.uk

**Sent:** 03 December 2015 19:28

**To:** P1

**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

Tel	lep	hoi	ne	:

Email: 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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