Forth Corinthian Yacht Club

Forth Corinthian Yacht Club
Middle Pier
Granton Harbour
Edinburgh
EH5 1HF

6th December2018

Redacted
Marine Licensing Casework Officer
Marine Scotland – Marine Planning & Policy
Scottish Government
Marine Laboratory
375 Victoria Road
ABERDEEN
AB11 9DB

Dear Redacted

06806 - Edinburgh Marina Granton Harbour Ltd – Marina Re-development

The Forth Corinthian Yacht Club (FCYC), founded in 1880, has been based at Granton Harbour since that time. The FCYC have moorings in the East Harbour which are leased on a long term by The Edinburgh Marina Ltd from Forth Ports.

1. As a joint partner of The Edinburgh Marina Ltd the FCYC fully endorses the submission made by Redacted the chairman of the company.
2. FCYC also have the requirement to crane boats from and to their boatyard at the south east corner of the Middle Pier into the West Harbour. The Club welcomes the assurance that we will retain the privilege of access to the West Harbour and quayside to carry out this activity. The layout plan for the new marina in the West Harbour shows clear access from the boatyard into the harbour. Masts are also stepped and unstepped either by crane or a mobile gantry on the quayside from and to the boatyard.
3. Edinburgh Trinity Sea Cadets and Newhaven Coastal Rowers are associated sections of FCYC being afforded facilities and space in the Corinthian yard. These groups will require to safely navigate rowing boats and skiffs, dinghies and craft without engines in and out the harbour during the construction and completion stages of the Harbour works. The risk assessments pertaining to Navigation should reflect the interests of these specific groups.

Yours sincerely Redacted
Redacted

FCYC Commodore

Forth Ports Ltd

Redacted

From: Redacted
Sent: 07 December 2018 08:48
To: MS Marine Licensing
Cc: Redacted
Subject: RE: 06806/06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Granton Harbour, Edinburgh - Consultation - Response Required by 09 December 2018

Dear Reda

Following internal review and assessment, the marine and environmental departments have raised the following comments:

Overall neither the licence nor BPEO state which disposal site(s) the Applicant proposes to use or how much (other than the total for sea disposal). We suggest that the disposal should be to Oxcars or Narrow Deep and not Bo'Ness on the grounds of:

1. Sustainability – to mitigate unnecessary additional travel distance and therefor emissions and fuel use and therefore cost for the Applicant
2. Scheduling to avoid Grangemouth disposal creates an additional scheduling burden on the Applicant
3. Proximity – generally it is considered best to deposit the material in a site closer to the source so as to avoid disrupting the sediment cell (or sub-cell) too much.

Forth Ports require that the Navigation element of the Construction Environmental Management plan and any procedures/Risk Assessments and mitigations are consulted on with and acceptable to Forth Ports as the Statutory Harbour Authority.

The Applicant should discuss the requirement or otherwise for a Notice to Mariners with our Marine department. The Applicant should supply the required information to the Harbour/Navigation Authority to allow them to issue the Notice to the required distribution. In addition the Applicant will require a Forth Ports Works Licence, and should contact myself to progress this application.

Best regards

Redacted
Group General Counsel and Company Secretary

Redacted

Historic Environment Scotland

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email to:
MS.MarineLicensing@gov.scot

Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Redacted
T: 0131 668 8896

Our ref: AMA/16/31/53
Our case ID: 300025365
Your ref: 06806 & 06807
03 December 2018

Dear Sir/Madam

Marine (Scotland) Act 2010
06806 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Construction
06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Capital Dredging & Deposit of Dredged Spoil

Thank you for your email consultation of 12 November requesting our comments on this Marine License application.

I can confirm we have no comments to make on the proposal. Cultural heritage interests were scoped out at the early stages of the EIA process.

Yours sincerely

Historic Environment Scotland

Ministry of Defence

Redacted

From: DIO-Safeguarding-Offshore (MULTIUSER) <DIO-Safeguarding-Offshore@mod.gov.uk>
Sent: 13 November 2018 15:38
To: MS Marine Licensing
Subject: RE: 20181113-06806/06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Granton Harbour, Edinburgh-DIO 10043072-O

Categories: Consultation Responses

Good Afternoon Redacted

Further to your e-mail below and after our investigation, I can confirm that the MOD has No Objection regarding the activities in the locations specified. I hope this information is sufficient for your purposes.

Regards

Redacted

Safeguarding Assistant
Estates – Safeguarding

Defence Infrastructure Organisation
Redacted

Northern Lighthouse Board

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA
Switchboard: 0131 473 3100
Fax: 0131 220 2093
Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: MSL 06807
Our Ref: AL/OPS/ML/D019_18

Marine Scotland – Marine Planning & Policy
Scottish Government
Marine Laboratory
375 Victoria Road
ABERDEEN
AB11 9DB

13 November 2018

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

06807 – EDINBURGH MARINA GRANTON HARBOUR LTD (PER CAMERON PLANNING) – MARINA RE-DEVELOPMENT - CAPITAL DREDGING & DEPOSIT OF DREDGED SPOIL

Thank you for your e-mail correspondence dated 9 November 2018 regarding the application by **EDINBURGH MARINA GRANTON HARBOUR LTD** for consent to carry out a capital dredging and spoil deposit campaign at Granton Harbour, Firth of Forth.

It is noted that the campaign will utilise the FO038, FO041 and FO044 spoil grounds within the Firth of Forth.

Northern Lighthouse Board has no objections to this proposal and recommends the following:

- **EDINBURGH MARINA GRANTON HARBOUR LTD** liaise with Forth Ports PLC with regard to the promulgation of Notice to Mariners.
- The final depths should be should be communicated to the UK Hydrographic Office to enable the appropriate updates to be made to navigational charts.

Yours sincerely
Redacted

Redacted
Navigation Manager

Privacy Statement

NLB take seriously the protection of your privacy and confidentiality, and understand that you are entitled to know that your personal data will not be used for any purpose unintended by you. In line with our document retention schedules, copies of this correspondence will be retained on our live internal system in line with our legislative requirements and obligations, before being archived as required for conformance with our data Protection Policy and the associated Data Retention Schedules. Archived copies may be retained indefinitely in the public interest. Our Privacy Notice can be accessed via the following link: https://www.nlb.org.uk/Terms/Privacy/

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA
Switchboard: 0131 473 3100
Fax: 0131 220 2093
Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: MSL 06806
Our Ref: AL/OPS/ML/PJMS_028_18

Marine Scotland – Marine Planning & Policy
Scottish Government
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29 November 2018

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

06806 – Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) – Marina Re-development – Construction

Thank you for your e-mail correspondence dated 9 November 2018 regarding the application by **EDINBURGH MARINA GRANTON HARBOUR LTD** for consent to carry out a construction works at Granton Harbour, Firth of Forth.

It is noted that the proposal includes the installation of 2 lit navigational buoys and a navigational light on the proposed breakwater extension.

Northern Lighthouse Board has no objections to the proposed construction works and recommends the following:

- The navigational light and topmark proposed for the breakwater extension will be required to be positioned at the South-easterly end of the 25 metre rock revetment, be at least 2 metres above MHWS and have a nominal range of 2 nautical miles.
- **EDINBURGH MARINA GRANTON HARBOUR LTD** communicate with Northern Lighthouse Board with regard to the required characters for the proposed navigational lights.
- **EDINBURGH MARINA GRANTON HARBOUR LTD** liaise with Forth Ports PLC with regard to the promulgation of Notice to Mariners, and local marine works licences.
- The final “as-laid” positions, upon completion of the project, should be should be communicated to the UK Hydrographic Office to enable the appropriate updates to be made to navigational charts.
- The Statutory Sanction of the Commissioners of Northern Lighthouses will be required for the establishment of the proposed Aids to Navigation. This form can be downloaded from the NLB website, or sent on request.

Yours sincerely

Redacted

Redacted
Navigation Manager

Privacy Statement

NLB take seriously the protection of your privacy and confidentiality, and understand that you are entitled to know that your personal data will not be used for any purpose unintended by you. In line with our document retention schedules, copies of this correspondence will be retained on our live internal system in line with our legislative requirements and obligations, before being archived as required for conformance with our data Protection Policy and the associated Data Retention Schedules. Archived copies may be retained indefinitely in the public interest. Our Privacy Notice can be accessed via the following link: https://www.nlb.org.uk/Terms/Privacy/

Royal Forth Yacht Club

Royal Forth Yacht Club

Patron: HRH The Princess Royal

Redacted

Marine Licence Casework Officer
Marine Scotland,
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB
ms.marinelicensing@gov.scot

8th December 2018

Dear Redacted

MS/18/145 - 06806/06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Granton Harbour, Edinburgh - Consultation - Response Required by 09 December 2018

I write on behalf of the Royal Forth Yacht Club (RFYC), as Commodore. RFYC supports and welcomes development of a fully functioning marina but we have the following comments, with particular reference to:

A **Navigation** We need continued ease of access to the harbour for existing users, particularly for boats without engines. I note with some concern item 3.8 in the Planning Statement (Cameron Planning) *Boats under sail - prohibition on harbour entry*, admittedly "except under exception".
B **Waves** in the E Harbour
C **Silting** in the E Harbour

A Navigation

The need for boats without engines (RFYC's racing fleet, sailing dinghies, coastal rowers and others) to enter and leave the harbour under sail or oar will continue.

1. <u>The proposed N mole extension</u>
    - Will define the channel but also constrain the passage of boats under sail by preventing access to the eastern edge of the W Harbour (eg whilst tacking out of the harbour when the wind is in the northerly sector).
    - The seaward slope may reduce the effective width of the channel.
    - The channel will be in the lee of the proposed N mole extension when the wind is from the W (prevailing conditions) further impeding the passage of sailing vessels.

2. Given the above, it is essential that vessels leaving the harbour have a clear view of vessels entering.
    - The channel between the N mole extension and Eastern breakwater is orientated approx NW (318 deg true). The proposed approach channel is orientated west of south (c 192 deg true), in other words there is a corner around which a vessel exiting may not see a vessel entering. It would make more sense for the approach channel to be a reciprocal of the channel between the N mole extension and Eastern breakwater.
    - Also, the port hand buoy marking the start of the approach channel is approx 0.5nm from the harbour entrance. This is well N of the Wardie Bay racing area and the southernmost marks of the mid Firth racing area. These race arears are used by both yacht clubs. Intermediate buoys laid closer to the shore would act as a turning point for yachts returning to harbour from these race areas.

B Waves

1. <u>E Harbour</u>
    - We are pleased to see that the wave studies do not demonstrate any adverse impact of the N mole extension on waves in the E Harbour. However, these are just predictions and the effect in real life is yet to be seen.
    - The situation should be kept under review and appropriate mitigation put in place if adverse effect is demonstrated.
2. <u>The Harbour entrance</u>
    - The wave studies do demonstrate an increase in wave height here, caused by reflection from the N mole extension, even with a 1 in 1 year storm. Whilst few boats would put to sea in storm conditions it is in storm conditions that boats will be entering the harbour to seek refuge. Increased wave height will further exacerbate the consequences of the narrow channel alluded to above
    - Engineering advice seen by RFYC suggests the height of reflected waves could be decreased by
        - decreasing the gradient of the seaward slope of the N mole extension (possibly at the cost of further reducing the effective width of the channel) or
        - using material with a high void content (eg “Tetrapods”)

C Silt

Granton Harbour is prone to silting. The application does address this but in *general terms only* and cites no evidence. Currently silt in suspension entering the harbour mouth is carried into both W & E Harbours.

1. <u>Construction phase.</u>
    - The application proposes the use of a silt curtain to separate W Harbour operations from the rest of the harbour.
    - Whilst this is welcomed it seems possible, if not likely, that silt that would otherwise have entered the W harbour will now be directed into the E harbour

2. Operational phase

- It seems possible, if not likely, that the channel between the N mole extension and E breakwater will direct silt into the E Harbour.

The situation should be monitored and mitigation put in place if silting in the E Harbour worsens.

D Other comments

Alternatives to The N mole extension

Response to the public consultation included suggestions that an extension of the E breakwater should be considered; the applicants' response was that the E breakwater was not in their control. This is surprising. The companies involved in the development of Granton Harbour are appear closely related and have at least some common personnel and Directors.

Company names

Reference is made in the application (admittedly in accompanying third party documents) to *Edinburgh Marina Ltd*. Edinburgh Marina Ltd is a registered company owned jointly by the Royal Forth and Forth Corinthian Yacht Clubs. Presumably the client of the third parties was Edinburgh Marina Granton Harbour Ltd, Edinburgh Marina Holdings Ltd or (according to one document) Granton Central Development Ltd.

Yours sincerely,

[submitted by e-mail]

Redacted

Commodore

Royal Society for the Protection of Birds

RSPB Scotland

Marine Scotland, Marine Planning and Policy
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen AB11 9DB

05 December 2018

ms.marinelicensing@gov.scot

Dear Sir/Madam

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)
06806 – Edinburgh Marina Granton Harbour Ltd – Marina Re-development - Construction
06807 – Edinburgh Marina Granton Harbour Ltd) – Marina Re-development - Capital Dredging & Deposit of Dredged Spoil

Thank you for consulting RSPB Scotland regarding the above applications for a marine licence. We were engaged with the scoping exercise and our observations have been noted by your department in the screening report.

The operations for which a marine licence has been requested have the potential to impact upon a number of nationally and internationally designated sites, notified for their bird and other conservation interests. Notable among these is the Firth of Forth Special Protection Area. We are satisfied that the relevant consultations, scoping and statutory procedures have been carried out to fully assess the potential impact of the proposals on qualifying features of the designated sites. We have the following comments to make on specific aspects of these.

Planning Statement

1.9 We concur with Marine Scotland that the construction and dredging are taken as part of the same project which can be covered by a single Environmental Impact Assessment (EIA) process.

Technical Appendix 5-4. Habitat Regulations Appraisal

Table 5.1 We agree that Pink-footed Goose can be screened out.

Appropriate Assessment for the SPAs

In general, we agree with the conclusion that the proposed works will not have a detrimental impact on the designated sites. Some short-term disturbance/displacement may occur on-site and in the

Lothian and Borders Office
Studio 2
Lindean Mill
Galashiels
TD1 3PE

Tel 01750 725 323

rspb.org.uk

Patron: Her Majesty the Queen Chairman of Council Redacted , FIEEM President: Redacted
Chairman, Committee for Scotland: Redacted Director, RSPB Scotland: Redacted Regional Director: Redacted
The RSPB is a registered Charity: England & Wales no 207076, Scotland no SC037654

immediate vicinity, but this will be of a temporary nature and should not lead to permanent displacement or loss of habitat. As mentioned, any birds utilising the harbour at present will be habituated to a certain amount of human activity and vehicular (marine and onshore) traffic. Nevertheless, whenever possible, works should be carried out in such a way as to minimise noise and other potential sources of disturbance to birds, and at times of day which avoid low-tide feeding activity.

Table 2. The WeBS alerts showing broadscale trends for qualifying species of the Firth of Forth SPA are measured against figures for October 2009. More recent WeBS counts should also be referred to. No attempt appears to have been made to determine how many birds, notably those that forage in the exposed intertidal, use Granton Harbour. Such data would allow the temporary displacement of these birds by noise or construction activity, to be assessed relative to the SPA population as a whole.

Mitigation

Mitigation measures should be realistic and achievable. For works to avoid “times when marine mammals and fish are likely to be breeding, calving, feeding, or resting in biologically important habitats located within the potential noise impact footprint” is essentially impossible. The other measures proposed, including low-noise piling and bubble curtains, are more likely to be effective and should be attached as conditions of any licence. As mentioned above, whenever possible, potentially disturbing operations should be avoided at low tide when birds will be feeding on exposed mud in the harbour.

I conclusion, we can confirm that RSPB Scotland sees no overriding ecological reason why these marine licences should not be granted by your department. Please contact me if I can provide any further information.

Yours faithfully

[*submitted electronically*]

Redacted
Conservation Officer

Royal Yachting Association Scotland

RYA Scotland

Royal Yachting Association Scotland

RYA Scotland

Caledonia House
1 Redheughs Rigg
South Gyle
Edinburgh
EH12 9DQ

T +44 (0)131 317 7388
E admin@ryascotland.org.uk
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6 December 2018

Redacted

Marine Scotland Licensing Operations Team
Scottish Government
Marine Laboratory,375 Victoria Road,
Aberdeen, AB11 9DB

ms.majorprojects@gov.scot

Dear Redact,

06806 – Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) – Marina Re-development - Construction
06807 – Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) – Marina Re-development - Capital Dredging & Deposit of Dredged Spoil

The draft response to the above referrals was compiled by Redacted , the RYA Scotland Planning and Environment Officer. However, as Re is a member of one of the Granton Yacht Clubs and chairs the management committee of the Edinburgh Trinity Sea Cadets, Re has asked me to review and sign the letter to avoid any perception of a conflict of interest.

RYA Scotland represents the Royal Forth Yacht Club and the Forth Corinthian Yacht Club which are based at Granton as well as the Sea Cadets, of which the Edinburgh Trinity and Leith units operate from Granton. The Edinburgh Trinity Sea Cadets are also an RYA Training Centre. RYA Scotland also represents the visitors who make use of the existing pontoons of the Edinburgh Marina Company operated by the two clubs.

A6806

RYA Scotland supports this application to build a marina that will meet or exceed all the criteria of the Five Gold Anchor scheme of The Yacht Harbour Association with the proviso that some of the detail needs to be clarified. To avoid any confusion RYA Scotland makes no comment about the underlying business case.

I am satisfied that impacts can be mitigated against and consider that the Environmental Impact Assessment has been well done although it is unclear whether the mitigations listed in Table 8.1 form part of the Marine Licence Application or are only examples of what might be done as Section 8.1 suggests that these are merely proposed. The selection of the characteristics of the outer layers of the rock armour will be crucial as appropriate grading has the capacity to absorb a high proportion of the incoming swell and wind-generated waves, thereby reducing the reflected waves with their associated cross-wave peaking characteristics which might otherwise increase the frequency and potential damage to moored vessels in the Eastern harbour. The wave energy absorbency is greatest if the outer layer has a high void content.

I welcome the commitment in section 6.6.3 to develop a Stakeholder Agreement 'to ensure that all stakeholder interests are taken into account once the marina is operational; in addition the Marina operator will develop an Operational Management Plan in liaison with all stakeholders.' and suggest that this be formalised as a condition of the award of a Marine Licence. The Stakeholder Agreement should also cover the construction phase as was stated in Section 7 of the Pre-application Consultation Report and section 3.7 of the Planning Statement.

Construction phase
The impacts from construction largely relate to the building of the breakwater extension and I am persuaded that it is possible to put mitigation in place to allow this major construction project to go ahead without a significant impact on the existing users of the harbour. Although I have a concern that section 6.6 does not mention the risk to small craft such as dinghies and rowing boats, particularly those without engines, which are currently based at Granton, this can be considered as part of the Stakeholder Agreement mentioned above. I also recognise the strong commitment of Forth Ports as the Statutory Harbour Authority to safety. Notices to Mariners should be mounted on the Forth Ports website and also sent directly to clubs, harbours and marinas on the Forth. RYA Scotland can advise how this might be done.

Operational phase
The greatest navigational impacts are likely to be felt by the skippers of small craft, particularly those without engines or with low powered auxiliary engines. However, I am satisfied that Forth Ports, as the Statutory Harbour Authority, will work with the marina operator and other harbour users to ensure safe navigation within the harbour.

Provided that the dimensions of the fairway alongside the Middle Pier within the west harbour are in accord with those marked on Plan A-P-00-G7-005 then the development will not adversely impact the ability of the Forth Corinthian Yacht Club to lift its boats in and out of the yard at the beginning and end of the sailing season.

Although there may be occasions when wave conditions between the East Breakwater and the West Breakwater extension are worsened by the development, and when waves are reflected into the East harbour by the extension, RYA Scotland recognises that the extension is essential to protect the West Harbour development. In the light of the UK Climate Change Risk Assessment 2017, the Scottish Government workshop on coastal and marine environments which formed part of the ongoing work on the second climate change adaptation programme, and the fact sheet on sea level rise and storm surge in UK CP 18 it seems clear that adaptation will be needed whether or not the marina is built in the West Harbour. In this regard Edinburgh Marina Limited, the operators of the existing pontoons in the East Harbour, have recently upgraded their pontoon moorings and hinges as a consequence of the damage caused by recent storms.

It is important that the Marine Licence includes a provision for the actions to be taken in the event that the developers are unable to complete the scheme or *in extremis* withdraw from it. This applies particularly to the breakwater extension.

A6807

RYA Scotland recognises the benefit of dredging the West Harbour and thus supports the application. As the timescale overlaps the end of the sailing season it is important that there is consultation with the Forth Corinthian Yacht Club to ensure that their boats can be lifted out in October 2019 (which generally takes place on a Saturday towards the end of the month). Dredging of area F is welcomed as it will widen the effective navigation channel between the breakwater extension and the East Breakwater, particularly near low water and go some way to mitigating the risk to small craft from boats meeting in the channel. As the two yacht clubs in collaboration with Forth Ports carry out maintenance dredging of the East Harbour there may be scope for considering a co-ordinated approach to dredging the harbour as a whole as there might be considerable cost savings to those parties by contracting the dredger to dredge parts of the East harbour once it has completed its work in the West Harbour. I recognise, of course, that this may not be possible for reasons of timing, finance and receipt of a Marine Licence.

Yours sincerely,

Redacted

Redacted

Chief Executive Officer
RYA Scotland

Scottish Environmental Protection Agency

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

Our Ref: PCS/162238
Your Ref: 06806/06807

If telephoning ask for:
Redacted

07 December 2018

Redacted
Marine Scotland
375 Victoria Road
Aberdeen
AB11 9DB

By email only to: Redacted

Dear Redacted

Marine (Scotland) Act 2010
Planning application: **06806/06807**
Marina Re-development
Granton Harbour, Edinburgh

Thank you for your consultation which SEPA received on 09 November 2018.

Advice for Marine Scotland

We have **no objection** to this planning application.

We have responded to a number of consultation on this proposed re-development: 02 May 2018(our reference PCS/158506); 15 January 2018 (our reference PCS/156611); 08 September 2017 (our reference PCS/154692). We have very little to add to these previous responses.

We note that overall the effects of the proposed development on the water environment, soils and coastal processes, and on ecology and ecological processes are deemed not to be significant. We also note the comment that cumulative effects associated with the proposed development were assed and no significant effects were predicted.

It is proposed to dispose of dredgings in the marine environment and we believe the relevant authority for this is Marine Scotland. If there is a change to this aspect of the proposal and the disposal of dredgings is to land, dredgings should go to a properly licensed site and SEPA's local office in Edinburgh should be consulted.

Silvan House, SEPA 3rd Floor, 231 Corstorphine Road, Edinburgh EH12 7AT.

Tel: 0131 449 7296

continued……

If you have any queries relating to this letter, please contact me by telephone on Redacted or e-mail at planning.se@sepa.org.uk

Yours sincerely

Redacted
Senior Planning Officer
Planning Service

ECopy to: ms.marinelicensing@gov.scot

Disclaimer
This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our website planning pages.

Scottish Natural Heritage

Scottish Natural Heritage
Dualchas Nàdair na h-Alba
nature.scot

Redacted
Marine Scotland – Marine Planning & Policy

Email: ms.marinelicensing@gov.scot

Date: 03 December 2018
Our ref: CLC153173/ A2798678
Your refs: 06806/ 06807

Dear Redacted

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

06806 – Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) – Marina Re-development – Construction

06807 – Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) – Marina Re-development - Capital Dredging & Deposit of Dredged Spoil

Thank you for your consultation email dated 13 November 2018 regarding the above marine licence applications and associated EIA Report.

Background
You previously consulted us at the EIA screening and scoping stages of this project proposal. At the scoping stage we advised that the EIA Report should examine potential impacts on the following natural heritage receptors:

- Natura sites, and the need for Habitats Regulations Appraisal (HRA);
- breeding birds;
- marine European Protected Species (EPS);
- Firth of Forth SSSI geodiversity features; and
- landscape and visual impacts.

Summary of SNH advice
We recognise the potential economic importance of this development proposal. We are therefore pleased to note the overall high quality of the EIA Report and supporting technical appendices that relate to our remit. In general we support the assessments and their conclusions, with a small number of exceptions which are described in Annex 1. We recommend that you secure all mitigation as described in EIA Report section 8 – Schedule of Mitigation, this will minimise impacts upon natural heritage receptors.

Annex 1 contains our advice on the above natural heritage receptors.

I hope these comments are useful, if you would like to discuss them further you can contact me on Redacted / Redacted

Yours sincerely

[by email]

Redacted
Operations Officer
Forth

Annex 1 – Natural heritage advice

1.Natura sites, and the need for Habitats Regulations Appraisal (HRA)
The application is supported by a comprehensive and generally robust HRA Report. Our advice below follows the three stages of HRA, and site-by-site comments on the information included in the report which will inform an Appropriate Assessment

1.1.HRA Stage 1 – is the proposal connected with conservation management of the Natura sites?
No – this proposal is not connected to the conservation management of any Natura site.

1.2.HRA Stage 2 – is the proposal 'likely to have significant effects' upon the Natura sites?
We support the conclusions in the HRA report (section 5.2) with regard to 'likely significant effects'. A single Natura site is screened out at this stage and seven sites progress to the HRA Stage 3.

1.3.HRA Stage 3 – will the proposal have adverse effects on the integrity of the Natura sites?
We commend the applicant on the approach they have taken to Appropriate Assessment whereby they have individually examined each conservation objective for each Natura site.

In general some minor, short-term and temporary impacts are expected on each Natura site – for example, displacement and/ or disturbance as a result of intermittent construction noise. However in our view if the measures outlined in EIA Report section 8 – Schedule of Mitigation are all secured then there will be no adverse effects on the integrity of any Natura sites.

We suggest that Marine Scotland can use the HRA Report and other supporting documentation as the basis of their own Appropriate Assessment, taking into account the comments below.

1.3.1.Firth of Forth SPA
We support the conclusions of the HRA Report (section 6.4) and advise that there will be no adverse effects on the integrity of this site.

Intertidal mudflats in the Eastern Harbour form part of this SPA and are supporting habitat for SPA birds to forage upon. We highlight EIA Report section 4, and specifically section 4.6.5.2, which provides evidence that any changes to sediment transport will be negligible and therefore have no effects upon the area of supporting habitat available to SPA birds.

1.3.2.Forth Islands SPA
We support the conclusions of the HRA Report (section 7.4) and advise that there will be no adverse effects on the integrity of this site.

1.3.3.Imperial Dock Lock, Leith SPA
Again, we support the conclusions of the HRA Report (section 8.4) and advise that there will be no adverse effects on the integrity of this site.

1.3.4.Isle of May SAC
Assessment of impacts upon the grey seal qualifying feature of this SAC focusses solely on the impacts arising from of dredging, but has not considered impacts arising from piling.

Whilst we support the conclusions (section 9.4) of this assessment, we advise that impacts from piling upon grey seals must also be considered as part of the HRA process. It is Marine Scotland's decision as to whether they carry out this assessment themselves, or require the applicant to undertake it.

We also advise that if the Marine Mammal Protection Plan (see section 3 of this letter below) is secured then this will minimise risk to grey seals. As such if this is secured then the HRA should be able to conclude there will be no adverse effects upon the integrity of the site.

1.3.5.Berwickshire and North Northumberland Coast SAC
Again, the assessment of impacts upon the grey seal qualifying feature of this SAC focusses solely on the impacts arising from of dredging, but has not considered impacts arising from piling.

Our advice for this Natura site is as per section 1.3.4 above.

1.3.6.Outer Firth of Forth and St Andrews Bay Complex proposed SPA
We support the conclusions of the HRA Report (section 11.2) and advise that there will be no adverse effects on the integrity of this site.

1.3.7.River Teith SAC
We support the conclusions of the HRA Report (section 12.4) and advise that there will be no adverse effects on the integrity of this site.

2.Breeding birds
The main EIA Report acknowledges (section 5.5.2) that some breeding birds may make use of harbour infrastructure. Although no specific measures are proposed to avoid impacts upon breeding birds, we advise that the presence of an Ecological Clerk of Works (ECoW) throughout the construction period will be adequate mitigation.

We recommend that you secure the presence of an ECoW as specified in Section 5.8 of the EIA Report.

3.Marine European Protected Species (EPS)
The application identifies the relevant Marine EPS and sets out a comprehensive Marine Mammal Protection Plan based on the use of Marine Mammal Observers and, when needed, Acoustic Deterrent Devices . We support the applicant's position that this plan will protect marine mammals from impacts arising from the development – i.e. primarily noise and vibration.

We note that the Marine Mammal Protection Plan is incorporated into the Schedule of Mitigation in EIA Report section 8 – and, as noted previously, we recommend that you secure the measures laid out in EIA Report section 8.

4.Firth of Forth SSSI geodiversity features

There are two designated geodiversity features in close proximity to Granton Harbour:

- Permian-Carboniferous Fish/Amphibia – located both within Granton's Eastern Harbour, and to the east at Wardie beach; and
- Palaeozoic Palaeobotany – located to the east at Wardie beach.

The EIA Report does not specifically identify these receptors, which are both hard rock features. Nevertheless the analyses of changes to wave climate (section 4.6.5.1) and sediment processes (section 4.6.5.2) are comprehensive and allow us to conclude that there will be no impacts upon either geodiversity feature.

5.Landscape and visual impacts

At EIA Scoping stage we advised that landscape and visual impacts should be assessed. Despite this the EIA Report (section 3.6) notes that these impacts have been scoped out of the assessment. On reflection we agree that this topic can be scoped out, and have no further comments to make.

6.Other natural heritage topics

The supporting documentation includes measures for the protection of otter and marine invasive non-native species (INNS). In both cases these measures are included in Section 8, and once again, we recommend that you secure all mitigation measures in Section 8.

Scottish Water

20/11/2018

Marine Scotland
Marine Laboratory 375 Victoria Road
Aberdeen
AB11 9DB

Customer Connections
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Customer Connections
Freephone Number - 0800 3890379
E-Mail - CustomerConnections@scottishwater.co.uk
www.scottishwater.co.uk

Dear Redacted

EH5 Edinburgh Granton Harbour Edinburgh Marina
PLANNING APPLICATION NUMBER: 06806/06807
DEVELOPMENT: OUR REFERENCE: 769531
PROPOSAL: MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

Please quote our reference in all future correspondence

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Water

- This proposed development will be fed from Marchbank Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website at the following link www.scottishwater.co.uk/business/connections/connecting-your-property/new-development-process-and-applications-forms/pre-development-application

Foul

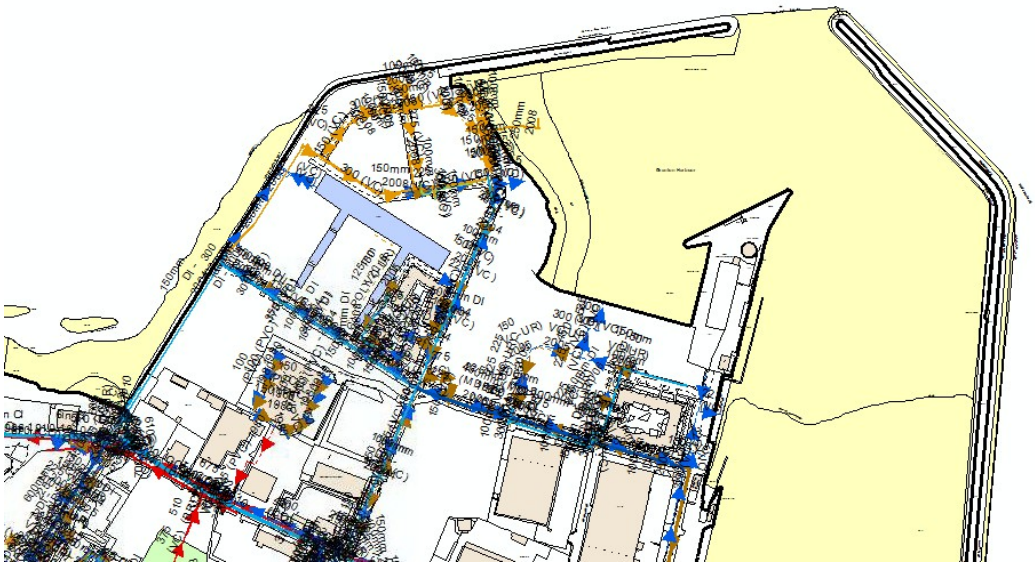
- This proposed development will be serviced by Edinburgh Waste Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful

guides, from Scottish Water's website at the following link www.scottishwater.co.uk/business/connections/connecting-your-property/new-development-process-and-applications-forms/pre-development-application

The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Infrastructure within boundary

According to our records, the development proposals impact on existing Scottish Water assets.



The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly at service.relocation@scottishwater.co.uk.

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

Scottish Water Disclaimer

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not normally accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- **Scottish Water asset plans can be obtained from our appointed asset plan providers:**

  Site Investigation Services (UK) Ltd
  Tel: 0333 123 1223
  Email: sw@sisplan.co.uk
  www.sisplan.co.uk

- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.

- If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.

- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.

- **Please find all of our application forms on our website at the following link https://www.scottishwater.co.uk/business/connections/connecting-your-property/new-development-process-and-applications-forms**

Next Steps:

- **Single Property/Less than 10 dwellings**

  For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a Pre-Development Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.

- **10 or more domestic dwellings:**

  For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

  Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

- **Non Domestic/Commercial Property:**
  Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk

- **Trade Effluent Discharge from Non Dom Property:**
  Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.

  If you are in any doubt as to whether or not the discharge from your premises is likely to be considered to be trade effluent, please contact us on 0800 778 0778 or email

TEQ@scottishwater.co.uk using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found using the following link https://www.scottishwater.co.uk/business/our-services/compliance/trade-effluent/trade-effluent-documents/trade-effluent-notice-form-h

Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.

For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.

The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at www.resourceefficientscotland.com

If the applicant requires any further assistance or information, please contact our Development Operations Central Support Team on 0800 389 0379 or at planningconsultations@scottishwater.co.uk
Yours sincerely

Redacted
Redacted

The City of Edinburgh Council

Redacted

From: Redacted
Sent: 11 December 2018 14:58
To: MS Marine Licensing
Subject: [PROTECT] FW: [PROTECT] 06806/06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Granton Harbour, Edinburgh - Consultation

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

06806 – Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) – Marina Re-development – Construction

06807 – Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) – Marina Re-development - Capital Dredging & Deposit of Dredged Spoil

Thank you for your consultation regarding the marine licence applications detailed above and the associated EIA report, with HRA and Otter Survey.

We are satisfied that, in respect of ecological matters which were raised at scoping stage, assessments have been undertaken as required and to an overall high standard.

We have considered the assessments in detail. Provided the proposed mitigation (as detailed in section 8 Schedule of Mitigation, Table 8.1) is fully adhered to, we agree with the conclusion in section 5, Marine Ecology and Ornithology, adverse effects will not be significant.

We have no further comment to make on this application.

Regards Redacted

Redacted | Senior Planner Planning Initiatives | Place Directorate | The City of Edinburgh Council | Waverley Court, Level G3, 4 East Market Street, Edinburgh EH8 8BG | Tel 0131 469 3625 | Redacted
www.edinburgh.gov.uk

Redacted

The Edinburgh Marina Ltd

THE EDINBURGH MARINA LTD

PONTOON MANAGEMENT - GRANTON HARBOUR – EDINBURGH

Registered Office: c/o ROYAL FORTH YACHT CLUB, MIDDLE PIER, GRANTON, EDINBURGH EH5 1HF

(note – send to ms.marinelicensing@gov.scot)

Redacted
Marine Licensing Casework Officer
Marine Scotland – Marine Planning & Policy
Scottish Government
Marine Laboratory
375 Victoria Road
ABERDEEN
AB11 9DB

5th December 2018

Dear Redact ,

06806 - Edinburgh Marina Granton Harbour Ltd – Marina Re-development

The Edinburgh Marina Limited holds a long-term lease on the East Harbour at Granton and operates approximately 120 moorings and a limited pontoon facility within that harbour.

1) We welcome the proposed re-development of the West Harbour, however the developer has an obligation for the new development not to effect the East Harbour

2) We note that the Environmental Impact Assessment suggests that there will negligible impact on wave activity within the East Harbour. We question whether the study includes the impact at all heights of tide, and note that the breakwater design does not utilise commonly accepted mitigations such as a shallow seaward slope and the use of voids (i.e. tetrapods) to break up wave action. We would suggest that wave activity in the East Harbour should be monitored (i.e. before and after surveys) to identify whether further mitigation is required post-installation.

3) We note that access to the East Harbour is required at all times and request that we are fully consulted regarding construction activity through the Stakeholder Agreement process, particularly with regard to the Operational Management Plan.

4) We note that ongoing access to the harbour is required for both powered and un-powered vessels (eg. keelboats, sailing dinghies, rowing skiffs).

5) We note that the establishment of the marina and breakwater will inevitably affect local tidal flow and the resulting deposition of silt, however there is no study regarding such impact. The developer has a responsibility to ensure that the existing situation is not permitted to deteriorate. We therefore request that silt levels within the East Harbour are monitored on a continuous basis, and any additional deposits removed by the developer.

6) We note that there are already significant constraints on parking at Granton and that these will be exacerbated by the marina operation; we suggest that further mitigation of this issue is required.

Yours sincerely, Redacted

Redacted
Chairman

Transport Scotland

Development Management and Strategic Road Safety
Roads Directorate

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF
Direct Line: 0141 272 7386, Fax: 0141 272 7350
Redacted

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Redacted
Marine Scotland
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

ms.marinelicensing@gov.scot

Your ref:
06806 &
06807

Our ref:
TS00538

Date:
4/12/2018

Dear Sirs,

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007

GRANTON HARBOUR, EDINBURGH - MARINA REGENERATION SCHEME CONSTRUCTION AND CAPITAL DREDGING & DEPOSIT OF DREDGED SPOIL

With reference to your recent correspondence on the above development, we acknowledge receipt of the Environmental Impact Assessment (EIA) prepared by EnviroCentre in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

Proposed Development

The proposed development is part of the Granton Harbour regeneration development which was granted Outline Planning Permission (now Planning Permission in Principle) in 2003. It is located approximately 4km north of Edinburgh City Centre. The closest trunk road to the site is the A90(T), approximately 5km to the west while the A720(T) lies approximately 8km to the south.

The proposed marine works associated with the wider Edinburgh Marina development comprises:

- Length of stone revetment to harbour;
- Length of vertical quay wall to harbour;
- Backfilling of land protected by quay wall and stone revetment;
- Formation of marina (340 berths);
- Extension to existing north mole breakwater; and
- Harbour dredging.

Transport Scotland provided a Scoping Response for the application in our letter dated 8 May 2018. In this, we noted that, while much of the sediment material resulting from the harbour dredging would be disposed of at sea, it was proposed to remove a large volume of it for treatment on land due to the nature of the sediment.

We requested that the forthcoming EIA should include an assessment of the potential environmental impact on the Trunk Road network of the vehicle trips involved with this material disposal as well as any other HGV movements associated with the construction of the development. An assessment was to be provided if the associated traffic flows were predicted to increase by the thresholds specified in the Institute of Environmental Management and Assessment (IEMA) Guidelines, i.e. where:

• Traffic flows will increase by more than 30%, or

• The number of HGVs will increase by more than 30%, or

• Traffic flows will increase by 10% or more in sensitive areas.

The EIA indicates that the proposed development will generate a maximum of 78 two-way HGV movements per day, or 7 two-way movements per hour.

Having reviewed the supporting documentation, Transport Scotland is in agreement that the generated trips associated with the construction phase of the proposed development will not have a perceivable detrimental environmental impact on the surrounding trunk road network.

Consequently, we have no objection to either the proposed re-development of the Marina or the dredging and deposit of the spoil in terms of impacts on the trunk road network.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Redacted at SYSTRA's Glasgow Office on Redacted .

Yours faithfully

Redacted

Redacted

Transport Scotland
Roads Directorate

cc Redacted – SYSTRA Ltd.

Public Response 1

Redacted

From: [Redacted]
Sent: 04 December 2018 21:59
To: MS Marine Licensing
Subject: Edinburgh Marina, Granton Harbour Redevelopment

Dear sirs,

[Redacted] I would like to raise my concerns at the proposed construction and alterations to the harbour entrance.

With the proposed construction of the marina the plans show the extension and construction of a breakwater to the Western harbour wall.

I am concerned that with the reduction of usable water on entering the harbour, probable increased tidal flow, increased traffic, reduced visibility and the effects the structure could have on winds could make it extremely difficult for yachts under sail entering or leaving the harbour safely.

I would be pleased if you would consider my above concerns before making any final decisions.

[Redacted]

Sent from Yahoo Mail on Android

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For more information please visit http://www.symanteccloud.com

Public Response 2

Redacted

From: [Redacted]
Sent: 06 December 2018 12:46
To: MS Marine Licensing
Cc: [Redacted]
Subject: Re: [1]: Granton Harbour Redevelopment & Dredging Marine Licence Application. & [2]: The Essential Requirement to Protect the adjacent Wardie Bay SSSI from Consequential Damage.

Dear Sirs,

My wife & I have learnt only today that there is an Application for Marine Dredging, as part of the proposed Granton Harbour Redevelopment.

We wish to register our deep concern at the potential for severe consequential damage impacting upon the adjacent SSSI of Wardie Bay,
which could result from this.

Wardie Bay constitutes an important & fragile inter-tidal site on the South shore of the Firth of Forth, & lies immediately to the East of Granton Harbour.

We urge, in the strongest terms, that stringent consideration be given to the avoidance of this significant danger.
&
That all necessary & essential safeguards are demanded, & put into place, as part of any Planning Consent .

Will you also ensure that all relevant Environmental Agencies are consulted - & their approval given - before permission to proceed
is granted.

Finally, will you please Confirm that these Concerns have been received & registered, & will be taken into Consideration in all subsequent
Planning Applications.

Yours faithfully

[Redacted]

[Redacted]

Public Response 3

From: [Redacted]
Sent: 06 December 2018 23:54
To: MS Marine Licensing
Cc: [Redacted]
Subject: Response to 06806 06807 Edinburgh Marina, Granton Harbour

To whom it may concern

Objection to the 2 project applications for Granton Harbour Redevelopment, Edinburgh Marina, as shown in the screen shot below.

I object as a local resident [Redacted] This area has a natural beauty and is extremely valuable for wildlife. It has grey seals, otters, curlews – on the red endangered list, and migratory birds. These animals would be very much disturbed and in my opinion would not return. Their feeding grounds, for example Curlews on the mud banks at low tide – would be completely destroyed along with the invertebrates which live there and on which the curlews feed. Other birds too would be scared by the increased traffic to the area which would result not only during works but after with increased use of the water (noise, pollution, disturbance, light). The environmental assessment thinks these animals would return but on what basis is this made? The habitat would be changed irrevocably which will have an enduring impact, not just during the works.

We have little enough wildlife and natural places in Edinburgh and it is of the utmost importance that we conserve what we have and this can only be done by protection of the environment. Wardie Bay is a Site of Special Scientific Interest (SSSI), it is one of the most important fossil areas in Scotland.

This development is not for local people, is not wanted by local people and will not serve the local people or area. It is about making money from development with little concern for the environment.

Please refuse these applications.

Grateful you can acknowledge this email.

Yours faithfully

[Redacted]

Public Response 4

Redacted

From: [Redacted]
Sent: 07 December 2018 10:09
To: MS Marine Licensing
Subject: Edinburgh Maria, Granton Harbour Redevelopment

Red
act

I wish to comment on the following applications:

	Applicat stage
06806 - Construction of Revetment Harbour Wall - Granton Harbour, Edinburgh	Applicatio
06807 - Capital Dredging and Sea Disposal - Granton Harbour, Edinburgh	Applicatio

I am responding as an individual who sails out of Granton Harbour and have done for many years.

Whilst generally supporting the development of a full marina at Granton, I have some concerns with the details of the application.

It is encouraging to see that more detailed wave studies have been conducted since the initial application. However, there are still the following issues:

1. The proposed new breakwater does not appear to sufficiently absorb the waves from the East/North East which are the problem area and could be damaging to the marina. It also intrudes at its lowest portion well into the harbour mouth thereby reducing the width of the entrance which could be a problem
2. It is also critical that the new breakwater does not bounce waves back across the harbour mouth thereby making it untenable in certain conditions. This is a harbour of refuge, accessible at all tides in emergency, and is the only one on the South of the Forth for many miles.
3. There are concerns that the new breakwater will increase the silt, which is brought down river, being deposited into the East Harbour.
4. There is talk of a silt curtain during the works. Where is this silt curtain to be placed - it cannot impede access to the rest of the harbour.
5. In general the works should not at any time affect access to the harbour. The pilot boats, the local sailors, local fishermen, water based businesses and the emergency services all require constant access being available.
6. The suggestion that unpowered boats should not pass through the harbour mouth is unacceptable. Racing boats, dinghies, cadets training, rowers, the Sea Cadets and the possibility of visiting boats with engine problems all need to be able to use the harbour entrance without engines.
7. The current plan for the location of the breakwater creates potential problems with boats under sail entering the harbour where at present there is space to drop sail once inside the harbour. Some

weather conditions make this desirable. With the proposed breakwater, sailing boats will invariably have to drop their sails before entering the harbour.

Yours
[Redacted]

Public Response 5

[Redacted]

From: [Redacted]
Sent: 07 December 2018 11:57
To: MS Major Projects
Subject: objection to Granton Harbour /06806 Devevopment

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Redacted
My objection to this developement is mainly the alterations to the Harbour mouth.It will reduce the access to the entrance and have an adverse effect on the East Harbour and will impact on both sailing clubs using the Harbour.
The developers have stated that their altered entrance will protect 66% of all boats using the west harbour..but what of the other34% and the users of the East Harbour.
I trust this will be added to the other many objections to this mad developement ,disreguarding the current users of Granton Harbour.

Yours

[Redacted]

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Public Response 6

Observations on MARINE LICENCE APPLICATION FOR WEST GRANTON HARBOUR
BY [Redacted]

[Redacted]

I am therefore very familiar with the challenges of creating a safe entrance to harbours and marinas exposed especially to strong easterlies.

Granton Harbour has been a yachting centre for over 150 years and is the only harbour of refuge between Amble to the south and Peterhead to the north. That is, it can be entered at all states of the tide and in all weather conditions. The Edinburgh Marina Ltd pontoon is used by yachts in distress, and by the police and RNLI to land casualties.

It is therefore imperative that the proposed Marina development, which I welcome, should do nothing to affect the harbour entrance adversely. In my opinion, the design of the proposed extension to the "North Mole" is likely to do just that, by reducing the usable width of the entrance – critical for yachts under sail – and by directing the waves, generated by strong easterlies, off the extension and into the East Harbour – to the detriment of yachts berthed on the Edinburgh Marina Ltd pontoon and moored on the Clubs' swinging moorings. As well, I imagine to the detriment of the pilot boats and commercial craft berthed on the east side of Middle Pier. As well of course, as creating a confused swell and counter-swell in the harbour entrance.

It seems to me that, at the very least, the licence application should address these concerns to the satisfaction of harbour users.

One obvious solution to this problem would be to extend the east breakwater northwards to close off the swell coming direct, as it were, from Inchkeith and seeking to enter the west harbour. That would provide a complete barrier to the disturbance which, as the applicant concedes (even with the North Mole extension), will inevitably sweep into the west harbour with profoundly damaging consequences in strong winds. If studies showed that swell from westerly winds would bounce back into the harbour entrance, then the north breakwater would have to be extended northwards as well – similar to the entrance to Sunderland Harbour. Creating a safe entrance and safe berthing in harbours on the East Coast of Scotland and England is not a simple matter and proper care must be taken.

I note that in a response to earlier observations along these lines, the applicant responded that the east breakwater was not part of its remit. Whether or not it is owned by the applicant – maybe in a

separate commercial entity, as would appear from the fact that a levy is placed on those tenants of the developer subject to the Deed of Conditions, as a contribution to a sinking fund for its maintenance - that response seems, at the very least, to concede that it is a fair solution to consider. I recommend that it be considered.

I note that the applicant proposes that the License should contain a provision that sailing craft should not be permitted to sail into and out of "the Harbour" except by special consent. If that is supposed to prevent sailing users of the east harbour from sailing in and out through the Harbour Entrance, it is, I suggest, beyond the remit of the applicant to make such a request. Forth Ports Ltd is the statutory harbour authority and such a condition would have to be the subject of a harbour bye-law. In any case, I do not consider it appropriate that the developer of a Marina in the west harbour, however welcome that is, should seek to impede the activities of sailors which have been practised for over 150 years.

I note also that the application is titled "Granton Harbour Redevelopment". I venture to suggest that this is misleading. The application is for a redevelopment of the west harbour. Not the whole harbour. I would ask that if and when a Marine License is issued, it is not titled to refer to the whole harbour.

[Redacted]
7 December 2018

Public Response 7

[Redacted]

8th December 2018

Redacted

Marine Licensing Casework Officer

Marine Scotland

Marine Laboratory

375 Victoria Road

Aberdeen

AB11 9DB

Dear Redacted ,

Edinburgh Marina Granton Harbour Redevelopment

[Redacted]

[Redacted] I welcome the proposal to build a marina in the West part of the harbour although it will not be of use to me as I require a mooring being under sail alone. I have the following comments on the marine licence application:

1/ The marina must not affect the ability of the yachts moored or berthed in the East harbour to carry on safely with their sailing activities day and night and all year.

2/ Safe access to the East harbour must be maintained at all times both during the marina dredging and construction operations and also when the marina is in operation as the harbour is a place of refuge.

3/ Safe access is required to and from the harbour at all times by un-powered craft. This includes many of the RFYC yachts and dinghies, and also the visiting yachts taking part in regattas which are a feature of summer sailing activities at Granton.

4/ The new extension to the West breakwater is likely to alter the existing processes of silt under suspension being brought into Granton Harbour with more silt being deposited in the East part of the harbour. The use of the silt curtain during the marina dredging and construction works will have the same, if not a larger, effect as the breakwater extension. Monitoring of silt levels in the East harbour will therefore be required, and if the silt level increases at a greater rate than at present then mitigation measures will need to be put in place by the marina developer.

5/ It is great surprise to me that one result of the Environmental Impact Assessment (EIA) is that the new extension to the West breakwater will not increase the wave activity in the East harbour. This result needs to be checked. If the wave action does increase then mitigation measures will need to be put in place by the marina developer.

6/ The orientation of the new extension to the West breakwater will reduce the current effective width of the entrance to Granton Harbour by about one third which will compromise the safety of all vessels entering and leaving the harbour, particularly un-powered craft. Did it not occur to the marina developer to investigate alternatives to the extension to avoid reducing the entrance width? The EU Guidance on the preparation of an Environmental Impact Assessment identifies the qualities of a good EIA, one quality being "includes a full description and comparison of the alternatives studied". Alternative solutions that could and should have been investigated are:

a/ orientate the new extension by approximately forty degrees in a westerly direction.

b/ build East and West breakwater extensions of suitable length and in suitable directions outward into the Forth.

c/ build a new breakwater or mole of suitable length and shape outwith the harbour, parallel to the line of the harbour entrance and at a suitable distance from the harbour mouth.

7/ There appears to be inadequate provision for parking for a marina of the size being proposed.

8/ The layout of the Marina office and community boatyard shown on Fairhurst drawing 115875/0100 and Wilson and Gunn drawing A-P-00-G7-005 differs from that shown on Fairhurst drawing 115875/0001A!

Yours sincerely
[Redacted]

Public Response 8

From: [Redacted]
Sent: 08 December 2018 20:28
To: MS Marine Licensing
Subject: Granton Central Developments Limited, Re-development of Granton Harbour/06806

Marine Scotland
License Operations Team
Case # 06806

Dear [Redacted]

I am a sailor [Redacted] out of Granton Harbour so I feel reasonably informed about Granton Harbour and it's unique qualities.

While developments in Granton are, in principle, to be applauded, please find below my considered response to Granton Central Development Ltd's initial proposals for the construction of a Marina in Granton's West Harbour.

With kind regards,

[Redacted]

_____

1) Access to the East Harbour during building works must not be affected- Forth Pilots need 24/7 access anyway and sailing clubs the same.

2) Work must not restrict access to the harbour generally- this is a fundamental safety matter of providing safe haven for any boats in peril/distress.

3) Works should logically take place during the 5-month off-season, between November and April, when water-borne traffic is at it's lightest.

4) The current design of the extension to the Western Breakwater (or 'North Mole', as per GCDL) is designed purely to protect the West Harbour, perhaps even to the detriment of the East Harbour and the local SSSI, through funnelling of waves.

The extension, by providing a reflective surface opposite the Eastern Breakwater, is already admitted to cause reflection of waves between it and the Eastern Breakwater itself, resulting in 'heaping' and 'exessive' waves in the harbour mouth. This was clearly described at the public exhibition by GCDL's own consultant. It would seem therefor that there is a high likelihood of actually increasing negative wave effects, at least in the East Harbour, by adopting the current design.

Building an extension facing inwards into the harbour creates a narrowing of the entrance and a kind of tunnel and makes exiting the harbour even more hazardous and, from some wind directions, virtually impossible. I calculate that there is an arc of approximately 35º when any winds from the north and northwest could prevent any non-engined sailing boats such as dinghies and racing boats from exiting the harbour at all.

If deemed necessary at all (and Granton Harbour has somehow managed to survive up to this point without

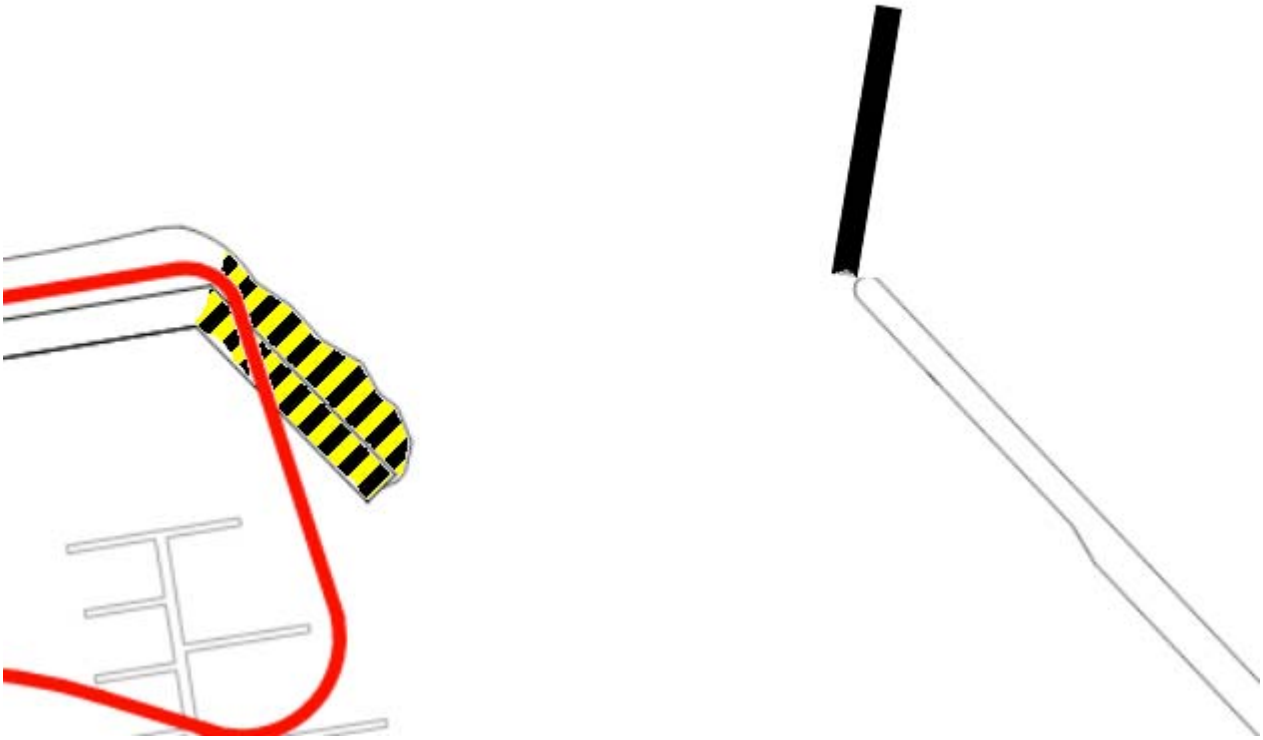
any extension), I suggest instead a single extension leading outwards from the harbour mouth and extending north/northeast, from the eastern breakwater tip (in black in the attached image below), be used instead. This would allow boats exiting the harbour to sail safely into open water to the west and at the same time protect the West Harbour from the north-easterlies and easterlies which the original proposal is intended to guard against. This slight 'reverse' angle, away from the ebb tide and current flow, could also mitigate any accumulation of silt.

5) Sporting activities: Granton has been a home for yacht racing since the early 19th century and is recognised as having some of the best racing waters in the UK. It regularly hosts national championships. It is hoped that the waters off Edinburgh can increasingly become a centre for UK-wide racing but for that to happen, racing boats (which seldom have or use motors) need to be able to sail out of the harbour. That can be tricky enough at the present time, sometimes requiring use of the West Harbour to tack into, to clear the breakwaters.

As we move towards a greater understanding of the need for exercise, sports are generally held to be the key to our future health so this present design of breakwater extension isn't going to help the public in taking up the sport of sailing at Granton, especially smaller and entry-level boats like dinghies which will be most affected.

6) Visual safety impact of extension: the case has been argued in several submissions already that the current design of extension could easily reduce visibility and potentially cause accidents as boats round the extension, straight into oncoming traffic. The confines of a harbour mouth is not the place to lose visibility, which is another argument for placing any wave mitigation outside the harbour boundary and thus maintaining line of sight. This current extension proposal feels like the marine equivalent of putting a property entrance on a blind bend.

I hope I have demonstrated that there are alternative and, I would argue, better solutions available.



Public Response 9

Redacted

From: [Redacted]
Sent: 08 December 2018 22:53
To: MS Marine Licensing
Subject: Granton Central Developments Limited, Re-development of Granton Harbour/06806

Dear [Redacted]

I sail recreationally out of Granton Harbour and have the following observations on the above plans:

i) The siting, construction, height and orientation of any extension(s) to the existing breakwaters is crucial to the safe operation of the proposed marina, and also to the continuation of the safe operation of commercial and recreational activities based in the East Harbour.

ii) I don't believe all the factors have been thoroughly enough considered, particularly waves in severe conditions from all the northerly points of the compass, and the visibilty available to vessels in the harbour approaches.

iii) Access to the East Harbour, both during the construction phase and once the work is complete, is vital for a considerable range of users and craft - the pilot boats, the *Defender,* two sailing clubs, two sea cadet units, coastal rowing clubs, visiting yachts and dinghies and non-affiliated small craft launching from the "public" slip.

iv) The estimate that there should be no extra silting up of the East Harbour seems optimistic and if it proved to be so there should be some commitment to dredge the East Harbour to current levels.

v) More generally I am concerned that the infrastructure available to current users, particularly access to their facilities and to the water, and parking space, is maintained even if they are not marina customers.

Given these concerns, though, I wish the project well. A good, well run marina at Granton would be a tremendous asset for the city.

Yours

[Redacted]

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Public Response 10

From: [Redacted]
Sent: 08 December 2018 23:16
To: MS Marine Licensing
Subject: Granton Central Developments Limited, Re-development of Granton Harbour/06806 - for the attention of Redacted

Marine Scotland
License Operations Team
Case # 06806

Dear [Redacted]

[Redacted]

we have held our Scottish Championship hosted in Granton for the last 2 years and plan to continue to run the event. We are due to host the National Dragon Championships in 2020 and the importance of a safe harbour which can be accessed at all times safely by a yacht under sail is imperative. There is a long history of racing and particularly Dragons from Granton harbour as they have been present racing on the Forth for the last 80 years, including the Royal Dragon 'Bluebottle' which is under restoration currently and due to return to the Forth in 2020.
I am interested in seeing the harbour developed but not at the expense of any part of it, so safe access to sailing waters by boats under sail needs to be maintained. Wave protection for the entire harbour should be proposed and modelled rather than just the west at the expense of the east harbour users.

Key points listed below:

1. The harbour is a safe haven and access under sail needs maintained at all times, including when under any development. We are an active club running racing every week from April to October and have large annual events with many 'sail only' yachts taking part.
2. The harbour and access to the immediate water outside is a place for children and adults to learn to sail and the entrance and wave conditions in the harbour should be unaffected by any development.
3. Deeper water is on the west side of the harbour entrance so sailing yachts would require to sail near the planned breakwater extension from which waves would be deflected making this more hazardous.
4. Yachts under sail have right of way in most circumstances but any powered vessels exiting the west harbour need to see it is safe to exit as a yacht or dinghy could be on the other side.
5. There is a public slipway in the East Harbour which means all types of vessels are launched and recovered there with no limits on the type and this needs to be retained.
6. Any major works should be scheduled when the harbour is not in full sailing season which is April to October.
7. An extension to the East Breakwater should be considered and modelled as this would offer protection for all harbour users.

Kind regards
[Redacted]

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Public Response 11

From: [Redacted]
Sent: 09 December 2018 09:48
To: MS Marine Licensing
Cc: [Redacted]
Subject: Granton Central Developments Limited, Re-development of Granton Harbour/06806

[Redacted]

Dear [Redacted]

I refer to the above application, which proposes the redevelopment of Granton Harbour. Any proposal to redevelop the harbour should be welcomed provided that such proposals improve the efficiency of the harbour and do not **negatively** affect the use of the harbour for those who already use this vital facility.

[Redacted] he yacht clubs which have used (and pay to use) Granton Harbour for many years, and who has witnessed the conditions within the harbour during storm conditions, I must express serious concern about the proposal to extend the western breakwater in a southerly direction, into the existing harbour.

Granton Harbour currently gives vital protection to nautical craft from adverse weather from most directions but it is particularly vulnerable during easterly storms when, particularly in conjunction with spring tides, seas are often seen breaking over the harbour wall, making conditions within the eastern harbour particularly hazardous. I have witnessed storm conditions in the harbour from all directions of the compass, but it is easterly storms which are the ones to be feared most. During such conditions I would suggest that any western breakwater extension, be it northerly or southerly, will serve only to deflect the force of the sea into the eastern harbour, thus making it quite untenable.

Clearly, by suggesting a western breakwater extension into the harbour, the developer is wishing to give some protection to the proposed marina from easterly weather but, in my opinion, the only breakwater extension which would give protection during such conditions to both the marina and the eastern harbour would be a breakwater extension heading north from the eastern breakwater. I am completely confident that this view would be borne out by any wave pattern study undertaken by any competent body of Marine Engineers.

My only other concern would be that any proposed engineering works within the harbour (and presumably the proposals will involve major engineering works) should not impede access to or egress from the harbour at any times whatsoever regardless of whether it is for corporate use (Forth Pilots etc.) or for leisure use,

yours sincerely,

[Redacted]

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Public Response 12

From: [Redacted]
Sent: 09 December 2018 12:32
To: MS Marine Licensing
Subject: Granton Harbour Development Application Number 06806

Re: Application reference number: 06806/181009

To whom it may concern,

As a sailor and leisure user of Granton Harbour [Redacted] it is very pleasing to see the plans forming for developing a long overdue marina in Granton. The benefits to Granton in particular and Edinburgh in general, and the opportunities it should open up in the sailing world, are potentially very exciting I would think. The sailing waters off Granton must be some of the best in the UK, but the lack of a viable marina close by has been a significant handicap in utilising them to their fullest extent and attracting new boats to visit or to be based in the area.

However, having reviewed the planning documents that have been submitted, I do have some reservations:

- The application does, understandably, focus entirely on the western harbour. However, the harbour entrance itself is shared by both the west and east harbours. The application doesn't appear to give a fair picture of the number of boats currently using the east harbour, which must number more than 100, not including the pilot boat activity.
- A good number of the boats using the east harbour are "sail only" (i.e. no engines) and therefore having an easily navigable harbour entrance is essential for them. It appears that the current plans for the harbour entrance would make it significantly more difficult for sailboat navigation, and possibly make it impossible to exit or enter the harbour under sail in certain wind directions and/or states of tide, due to narrowing of the entrance and reducing angles of approach.
- I'm also concerned about the effect the current plans would have on both silting and waves. Silting is already quite a problem in the east harbour – the sailing club [Redacted] has invested heavily in silt agitation over the past number of years to ensure club boats can continue to use the harbour. It is possible that the new north mole extension will direct both additional flow and waves into the east harbour and consequently more silt. This is concerning on several levels:

    - The ability to keep the east harbour navigable due to silt built-up.
    - The effect of additional waves on moored boats (wear and tear, damage) – many of which are touching the bottom on low states of tide.
    - The additional difficulties of navigating in and out of the harbour due to larger waves.

I can appreciate that the developers wish to build as large a marina as possible, but it is difficult to see where the additional boats will come from to take up all the potential berth places on offer. The current marina berths in Granton [Redacted] at most see no more than a handful of visiting boats at any one time over the summer. Undoubtedly the new marina will be a major attraction to visitors but still, the development must be viewed as quite risky. My point is that I think it would be wrong for Grantion to "put all its eggs in one basket" and fully commit to the new marina while not giving fair consideration to the existing long-term users of the harbour.

I am certainly no nautical engineer, but I wonder if other alternatives are possible, which would give the west harbour the additional protection that it needs for the marina, without adding the navigational difficulties to the harbour entrance or causing additional problems to the east harbour users? Might it be

possible to design a solution which would even benefit all harbour users? For example, would an extension outwards on the eastern breakwater give equivalent protection for the west harbour, cause fewer problems in the east harbour and possibly even give some benefits there also?

In any case, I hope these points are relevant and helpful in the planning process going forward, and we look forward to seeing further developments.

Your faithfully,

[Redacted]

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Public Response 13

From: [Redacted]
Sent: 09 December 2018 12:33
To: MS Marine Licensing
Subject: Grafton harbour development number 06806

Dear [Redacted]

I have used Granton Harbour to sail boats [Redacted]

I am really pleased that at last there is significant development planned to promote usage of our excellent sailing waters.

Obviously the current plans are focussed on the marina and the breakwater is intended to protect that.
However I am concerned that the plans may cause unintended ill effects to the harbour as a whole and in particular:
1. risk more silting up of the east harbour, 2. mean rougher seas at the harbour mouth in some conditions- already a problem especially in dinghies and
3. possible congestion at the new more narrow entrance - especially given that sailing boats will require to manoeuvre alongside motor boats. Visibility may be restricted by the new construction.

Thank you for your consideration

[Redacted]

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Public Response 14

Redacted

From: [Redacted]
Sent: 09 December 2018 13:57
To: MS Marine Licensing
Subject: OBJECTION to the dredging of Granton harbour

Dear Sir/Madam,

I would like to strongly object to the dredging of Granton harbour in Edinburgh. I feel this would be very disruptive to the fragile ecosystem which survives there. Granton harbour is the last rare and fragile wildlife haven along the Edinburgh coast and it is important it is preserved in its wildness as a sanctuary for birds and animals and their food lower down the chain, all supporting the balance. There are a large number of endangered and rare birds, like eider ducks, curlews, warblers as well as seals with seal pups who come in at high tide to bask in the sun.

I have read on your application that you will use explosives, this will also damage the ecosystem. With the dredging taking eighteen months, many migrating and nesting coastal birds will loose their habitat, and as areas they counted on as safe resting places are demolished they may die from sheer exhaustion. As you will be aware it is illegal to move nesting birds. I feel that the area effected will be too great and the plan is too disruptive to the area, with too much mud being moved on too big a scale. The operation will disrupt surrounding roads, traffic, residents as well with the 156 564 tonnes of mud being moved and 'disposed of'. Were will it be disposed? What about all the wildlife and crustations which live in the mud, which are the food for the endangered birds who live there or migrate past. In this present day it is evermore important to protect our wildlife and not to push it out for profit as it is all of us who will suffer.

I look forward to hearing from you,
[Redacted]

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Public Response 15

Redacted

From: [Redacted]
Sent: 07 December 2018 17:50
To: 'ms.majorprojects@gov.scot' <ms.majorprojects@gov.scot>
Subject: Granton Central Developments Limited, Re-development of Granton Harbour/06806

[Redacted

I am writing to express some concerns that I have with the development of a Marina at Granton Harbour. I should say at this point that I have no objections to a marina, provided that it does not have a detrimental effect on the rest of the harbour.

As a boat owner who used to sail from Granton, [Redacted] am concerned that not enough has been done regarding the following.

1. A number of the keelboats and almost all the sailing dinghies that use the east harbour have no engines and were never designed to have one fitted. The construction of a Mole from the West Breakwater will, in my opinion, make it virtually impossible in certain winds to be able to sail out or in of the harbour entrance. This will have a major effect on the suitability of the harbour for those boat owners that have these type of boats. It will seriously affect sailing for dinghies, mainly undertaken by young people. At a time when we are trying to encourage participation in sport by the younger generation, this would be a backward step. This in my opinion will have a major consequence for the future of the Royal Forth Yacht Club.
2. The construction of the Mole in the position suggested will leave a major blind spot for boats entering from seaward. This will be especially evident at Low Water.
3. I do not consider that the position of the Mole as suggested will give enough protection to the marina and will in fact increase the likelihood of waves being created in the East Harbour. I feel that a proper wave investigation needs to be undertaken taking all winds and sea states into account. I would say that the Mole should be outside the harbour and pointing northwards from the East Breakwater. In my opinion This would have the effect of stopping an Easterly swell entering the harbour, this would also not restrict the width of the entrance and allow boats to sail out or in (see 1). We are constantly being told about one hundred year and twenty year storms, in my opinion we have had at least two of these in the last ten years. Perhaps the criteria for these storms needs to change, that may be a whole other matter of course.
4. During the construction of any Mole it is important that access to the harbour is maintained, therefore the work must be carried out during the closed season for sailing, mid October to April. Forth Ports Pilots will also need access all year round.
5. The plans show that the marina will cater for ‘Super Yachts’ of up to forty five metres. A yacht of this size can have a draft of four metres or even more. Even yachts considerably smaller can have a similar draft. Given that the depth of water at Chart Datum outside the harbour can be as low as 3.4 metres, is there a proposal to dredge a channel out to the deeper water, say the five metre line. This depth can only be achieved about one mile from the harbour entrance. It is accepted that a large swell can effect the Forth

outside Granton and this means that at LW no boat owner with that sort of draft will go anywhere near such shallow water.

6. I do not consider that any studies have taken into account what affect the marina works and final design will have on silting of the East harbour or indeed the silting of the entrance.

As previously stated, I have no objections to the marina development. However, I consider that if it goes ahead as per the present proposals, it will have a detrimental effect on many of those people still wishing to sail from the East Harbour. As I will be one of them when and if I bring my boat back from the West, I do not think this has been taken into account.

[Redacted]

[Redacted]

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Public Response 16

From: [Redacted]
Sent: 09 December 2018 15:10
To: MS Marine Licensing
Cc: [Redacted]
Subject: Response to 06806 06807 Edinburgh Marina, Granton Harbour objections expiry date 9th December

Dear Sir/Madam,

I wish to register my objection to the above application. I am a resident in [Redacted]

[Redacted] the Granton Pier which is a magnificent place of great natural beauty, full of beautiful and diverse birds, some endangered (e.g. the Curlews) feeding on the plentiful marine invertebrates in the mud at low tide. There are also seals in the harbour. The whole seafront in from Granton Harbour is a peaceful reserve . This will be destroyed by the planned dredging and Marina. There are fewer and fewer undisturbed sites of Natural Beauty for people to escape to. Let's keep this one safe.

I understand there is a plan to dredge 156,000 tons of sediment from the harbour, which I believe will destroy this wonderful habitat. The disturbance also (calculated at 6 lorries an hour for 18 months) will be very stressful for the road infrastructure. Lower Granton Road is often close to gridlock and any other route will have a bad impact. I have looked at the environmental assessment which is based on one afternoons observations, which is cursory and inaccurate.

I also am very surprised that I was not contacted by leafleting about this major piece of vandalism on our local environment. I only found out about this through a chance connection to someone on the community council last week. I consider this a grave dereliction of public information. How were we meant to know about this?

I hope that the time window for objections will be extended and local residents in all the surrounding streets contacted by leafleting.

Your Sincerely,

[Redacted]

[Redacted]

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Public Response 17

From: [Redacted]
Sent: 09 December 2018 21:32
To: MS Marine Licensing
Subject: Fwd: FW: MS/18/145 - 06806/06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning)
Attachments: 118120921265301165.jpg; 118120921265301365.jpg; 118120921265301565.jpg; 118120921265301765.jpg; 118120921265301965.jpg; 118120921265302165.jpg

Dear [Redacted]

While I am [Redacted] of a local yacht club, which will be making its own submissions, I feel that I should also make my own personal submissions given the importance of this proposed development to sailing out of Granton Harbour in particular and for sailing on the Forth in general. I have been sailing out of Granton Harbour [Redacted] so I do feel that I know the harbour well.

I have lived through the false dawns of Forth Ports various proposals during this period and so to finally see something happening to bring a marina to Granton is most welcome and exciting. It is therefore important that this development is carried out correctly for the benefit not only of the marina users themselves but for all of Granton Harbour's users. In this regard I have the following concerns:-

1.The existing swing moorings in the East Harbour must not be affected either during building works or once the marina is up and running, not all existing sailors will be able to afford the marina's prices or make use of it;

2. Neither the marina itself nor the building works should restrict access to the east harbour- it is narrow enough at present;

3.The planners have to be 100% satisfied that the proposed inward extension to the western breakwater will not exacerbate the build up of silt in the eastern harbour nor increase the effect of waves on boats moored in the east harbour. The proposed extension simply looks wrong;

4. This will be an expensive development and marina developments have a poor record of making money first time round. What contingency plans will the planners insist on to ensure that this development is completed on time;

Kind regards

[Redacted]

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Public Response 18

From: [Redacted]
Sent: 09 December 2018 23:12
To: MS Marine Licensing
Subject: License Operations Team, Case # 06806

Dear [Redacted]

I am writing with my concerns about the proposed works to been carried out in the Granton West harbour, Edinburgh.

I have been sailing out of Granton [Redacted] and feel I have a reasonable informed about water in this area.

I am happy that the harbour area is being regenerated, however I do have concerns in way this is being done and in the quality of workmanship. During the renovation of the powders store I believe we were very lucky not to have had the scaffolding structure lost in the harbour during a winter storm.

My main concerns are detailed below:

- At the current time Granton Harbour can be accessed with any wind direction, with the proposed extension to the western harbour wall, entering with a North or North-Easterly wind will be difficult if not impossible.
- I believe that the extension will funnel waves into East Harbour, creating problems for moorings at the North-West side of the East Harbour and Pilot Boats.
- I believe the extension will increase the silting levels in the East Harbour, as the silt will follow the water flow.
- During the building of the extension will there be restrictions on the access to the harbour? I believe some of the work will require divers, so there will need to be water restrictions to ensure their safety. To limit the effect on the leisure sailors of both clubs and Pilot boats I would hope this work is done over the winter season.
- Has there been any other options look at for the location of the breakwater, possible on the Eastern wall? This also may reduce the level of silting which would benefit both harbours.
- A number of boats currently sailing out of Granton are sailing boats (Dinghies) with no engine or very low powered outboards, I believe the extension will make it very difficult from them to safely sail in and out of the harbour entrance. As any one that has sailed out of the harbour entrance at Granton can confirm, the sea state can is often very rough and confused even in light winds, the effect of waves been reflect back of the extension can only make harbour entrance worse.

The Royal Forth Yacht Club (150 years) and the Forth Corinthian Yacht Club (138 years) have sailed out of Granton's East harbour for many years and it would be sad for this stop due to a poorly located extension to the western breakwater.

Kind Regards

[Redacted]

Public Response 19

From: [Redacted]
Sent: 10 December 2018 13:13
To: MS Marine Licensing
Subject: Fwd: Granton Harbour redevelopment

Begin forwarded message:

From: [Redacted]
Subject: Granton Harbour redevelopment
Date: 8 December 2018 at 17:51:21 GMT
To: ms.majorprojects@gov.scot

[Redacted]

As [Redacted] of the Royal Forth Yacht Club [Redacted] + I have enjoyed sailing and racing a sailing boat, no engine, regularly for 8 months of the year.

The members of this historic club are enthusiastic sailors, many of whom sail similar sailing boats. All of us rely on the harbour entrance being safe for entry /exit - as we are obviously relatively vulnerable without having recourse to an engine. I am concerned that the plans pose potential risk and feel that this aspect of risk to sail-only boats might not be apparent when these plans are considered, but that this is an extremely important consideration for this unique sailing area.

I am not qualified to comment in detail but I feel there must be alternative safer options.

The Royal Forth Yacht Club is a precious commodity to it's current and future members, and it would be a very great shame to jeopardise this potential sporting facility, especially in a climate where exercise/outdoor healthy activity is being encouraged for the health of the nation.

Kind regards

[Redacted]

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