**Response to planning application 17/00434/P alterations and extensions to the Scottish Seabird Centre, North Berwick Harbour**

North Berwick Community Council have discussed the above planning application and wish to make the following comments. Our discussion focussed on the building, its visual impact and the effect on its surroundings, and the wider effects the development would have on the North Berwick Community. Issues were also raised regarding the heritage of the site and the impact of demolition and construction.

Visual impact

1. The proposed development was felt to be overlarge in terms of size and scale, with a resulting dominant visual effect on the views of and from the harbour, of, from and across Anchor Green, from East (Milsley) Bay and from seaward. This was felt to be harmful.
2. The development will be higher than existing buildings, changing the roofscape of the area.
3. The development will visually enclose an existing open area and its important seaviews, an identified essential element of the character of North Berwick. This was felt to be unacceptable.
4. There was much praise for the existing building and a recognition of its architectural significance in the harbour area. Indeed it is often referred to as a landmark building, in open space.It was felt that whereas the wrap around element of the extension could be regarded as enhancing the existing building, creating a visible,physical link to the Sunlounge as it stands now or in its extended form would harm the views and form of the original building.
5. There is little doubt that the development will have a significant impact on the listed buildings and harbour area. It is difficult to see how this impact will be an enhancement, a requirement for managing change in such a sensitive, historic and conservation area.

Effects of construction

1. It was felt that the construction traffic, storage of construction materials and equipment, would result in significant access issues for harbour users, residents and visitors.
2. The harbour area is thriving. Numerous visitors are attracted here to the Seabird Centre, the Lobster Shack and Rocketeer eateries, to take part in water sports, boat trips, visit the Lobster hatchery, beach wheelchairs etc. Significant concerns were raised as to their continuing business during construction, both in terms of falling visitor numbers and the inevitable limited access. NBCC would not wish to see the work of the harbour trust in making the area more attractive for visitors and businesses undermined.
3. The length of construction time is not clear but it can be assumed to be no less than 18 months. This is a significant amounting time for small businesses, the kind that operate from the harbour area, to have their income reduced or stopped through the issues raised above of access and reduced attractiveness for visitors and other users.
4. Construction traffic, materials, waste will need to be transported into and out of the area along already congested roads and a one way system. Concerns were raised about the impact on residents in nearby streets and in how this traffic will be managed in the wider area.

Effects on community

1. It is to be assumed that the new National Marine Centre will attract many more visitors. There are no projections in the planning application or associated documents so it is difficult to comment in such a vacuum. However, if there are significantly more visitors coming to North Berwick, this will affect any traffic management and parking strategies currently under development. This is important as the NB community, including representatives from the Scottish Seabird Centre, have just engaged in an expensive (£30,000) charrette process on this very subject. It is disappointing that even before the charrette report and it’s recommendations are published, it may already be out of date with regards to the harbour area and town centre parking.
2. There is a further assumption in the application that more visitors to the Centre will have a spin-off effect on the High Street and the local economy. Again, with no projected visitor numbers or analysis, any economic benefit must remain aspirational.
3. It was recognised that the current Seabird Centre plays an important role in conservation education with many schools organising visits. It was also recognised that the existing arrangements limit the capacity of the Centre to accommodate more educational trips; development, therefore, appears justifiable. Indeed, NBCC members reported that any supporting comments they received from members of the public were about expanding the education provision.
4. Increasing the numbers of school visits will have no economic benefit to North Berwick.
5. It is estimated that building the National Marine Centre will result in a further 9 FTE jobs being created.
6. It is often pointed out that one of the main attractions of the harbour area is simply the ability to go and sit at the harbour wall and enjoy the atmosphere and surroundings. Some of our visitors have accessibility issues and use Anchor Green in a similar way, particularly the area where they can overlook the harbour. This can be done for free. The proposed development will change this area, not least the part of Anchor Green overlooking the harbour. The views will still be available from the connecting bridge and offices but will require an entrance fee. Accessibility is also an economic issue.

Effects on heritage

1. It was felt that the proposed development would have a significantly harmful effect on the heritage assets on Anchor Green. There was particular concern raised over the potential to damage or indeed destroy important archaeology which includes the disturbance of human remains in the Anchor Green cemetery.
2. The application heritage statement acknowledges the harmful effects of the build but justifies this by stating that the proposed development is the minimum required to ensure the Centres continuing viability. There is no evidence for this provided in the application either on why this has been settled on as the minimum requirement or how it will ensure viability. It is our opinion that in the absence of such evidence, we cannot agree to the harm caused by the build.
3. The heritage statement rightly points out the fundamental principles of protection and enhancement of historic environments with a clear emphasis on enabling change in such environments that is sustainable. It is our view that sustainability is not only concerned with environmental issues but is also economic and social. There is no evidence in the application that these changes will make the new Centre economically sustainable, nor that it has considered the short, medium and long term impact on the North Berwick Community. It is our opinion, therefore, that this proposed development is not sustainable.

General comments.

It was with some sadness that NBCC arrived at our conclusions. We would like to stress that we wish to support the Seabird Centre in its work but that this particular proposal has raised too many concerns. As a community council we are tasked with commenting not only on planning specific issues but also to offer insight into community opinion. There is no doubt that the application has it’s supporters but our experience is that they are greatly outweighed by those who have concerns. We would like to make one further comment on the public consultation process carried out by the Seabird Centre and it’s staff. There is an appreciation for the work staff put in to attend meetings, raise the profile of the proposed development and be available for comments and discussions; It is a difficult and tiring job and we are grateful for what they did. However, there was a lack of information at these events, again about projections, planning specifics etc that made it difficult for people to form opinions or get behind the project.Indeed it has been pointed out that there were significant changes between what was shown at these events and the eventual planning application. Displaying possible plans is not public consultation which the NBCC would like noted.