



Torry Medical Practice
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Just Transition Commission Secretariat
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Dear Professor Skea,

I am writing on behalf of River Dee Medical Group in Aberdeen. We are concerned about the health impacts of the possible loss of the last remaining green space for the residents of Torry at St Fittick's Park. Aberdeen City Council has given permission for a change in use of the area so that it may be now be considered for development as part of the proposed Energy Transition Zone (ETZ). We have outlined below why we believe that the outcome of any decision to develop the park as proposed would contravene many of the principles of a just transition as detailed by the Commission. We also describe our similar concerns about the planning process. We conclude our letter with a request for information and possibly action by the Commission.

River Dee Medical Group is a community interest company that owns Torry Medical Practice. Many of our staff and most of our patients live in the community directly affected by the proposed plans for St Fittick's Park. Torry contains the most concentrated area of multiple deprivation in the north of Scotland. Over half of our patients are in the bottom 2 deciles of the Scottish Index of Multiple Deprivation, as is the whole of the area adjacent to St Fittick's Park (Balnagask). There is a 10 year reduction in average life expectancy in this area compared with the west end of Aberdeen, and a twenty year reduction in healthy life expectancy. I append an open letter signed by clinicians in Aberdeen which gives further details of these existing health inequalities.

We feel strongly that the loss of this green space would incur yet another specific deprivation on the area, that of green poverty. Beyond a small amount, loss of green space cannot be mitigated for or compensated by gains in other areas such as improved housing or employment opportunities. The loss of St Fittick's Park would impose a fixed ceiling on the health gains possible through other means, because access to green space is an irreducible element of basic human well-being.

As such, the outcome of a decision to allow the development of the St Fittick's park site for the ETZ would contravene many of the principles laid down by the Just Transition Commission. Like the Commission, we support *a net zero and climate resilient economy in a way that delivers fairness and tackles inequality and injustice*, and share the ambition to *create a more cohesive and resilient economy that improves the opportunities, life chances, and wellbeing of every citizen*. Yet it is clear that the loss of the green space at St Fittick's Park would be unfair, and would reinforce rather than tackle health inequalities and thus undermine the life chances and wellbeing of local citizens. *The second, broader definition [of a Just Transition]... emphasises the importance of not continuing to sacrifice the well-being of vulnerable groups for the sake of advantaging others*. Torry has been disproportionately affected by industrial development over many decades: the loss of the old town to make way for offshore oil infrastructure, the waste processing plant, the landfill site, the sewage works, the waste heat incinerator, the East Tullos industrial estate and the many food processing

plants. It is hemmed in on almost all sides by regional industrial infrastructure, not to mention Wellington Road which is one of the most polluting in Scotland. This is an area that has already sacrificed a great deal for the benefit of the wider region. The Commission calls for solutions that *address injustices, including the inequitable distribution of environmental hazards and the lack of influence of communities affected by these new sources. For example, the construction of a large solar scheme in Gujarat in India has, through the enclosure, commodification, and privatisation of land for the development, led to the land dispossession of vulnerable communities.* The land of St Fittick's Park has been held in trust for the people of Torry by Aberdeen City Council. Their willingness to dispose of the land for purposes to which the people of Torry are overwhelmingly opposed without any consultation is a betrayal of that trust. It is hard to see where this differs in substance from the case cited above of a solar farm in Gujarat. Lastly, the Commission seeks to *build on Scotland's existing strengths and assets.* We would point out that not only is the park an irreplaceable health asset, but is a significant existing green asset, hosting considerable biodiversity and already providing ecosystems services.

Additionally, we feel that the process of planning and consultation has not followed, and in certain respects is directly in opposition to, the principles outlined by the Commission. The Commission supports transition to *a net zero and climate resilient economy in a way that delivers fairness and tackles inequality and injustice... in a way that is co-designed and co-delivered by communities... transition planning should be participatory, applying both distributive and procedural justice, and taking into account those who will be affected by transition processes across the socio-economic system.* [The Commission recommends to] *Embed just transition in every aspect of legislation, regulation and planning.* However, the planning process for the development of the South Harbour and the subsequent ETZ have been characterised by a dearth of meaningful consultation with the population and an absence of any involvement in decision-making. Despite numerous attempts by local residents to clarify what is the specific proposed use for the area (hydrogen storage, wind turbine lay-down etc) neither the council nor the applicants, ETZ Ltd, have provided any details. This vagueness aside, there have been information-giving presentations by Ironside-Farrar and Vattenfall, where they asked for the opinions of those attending, but again these events represent no involvement in decision-making, and there exists no formal process governing how those opinions would, if at all, influence decision-making. ETZ Ltd has received perhaps £70m of public funding already with little democratic accountability or oversight, least of all from those directly affected by the proposed development. Our communications with staff and patients demonstrate a widespread anger and often distress, at decisions being made without them, and of unwelcome developments forced upon them, yet again, without any opportunity to be involved in these decisions.

We would therefore be grateful if you could help with the following queries:

1. Has the Commission examined, or been asked to examine the proposals and / or planning processes for the proposed ETZ including the areas at St Fittick's Park?
2. If so, has this assessment been published or is otherwise available?
3. If not, then could we request that the Commission urgently examine this case?

Thank you.

Yours sincerely,

Dr Adrian Crofton

Executive Director, River Dee Medical Group CIC