

**From: FRIENDS OF THE FIRTH OF CLYDE**

FAO:

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Dear [REDACTED]

**Re: Pre-Application Consultation (PAC) for Marine Scotland Licence application relating to proposed works at Clydeport Operations Ltd Construction Yard held on Weds 8<sup>th</sup> August 2018, Fairlie Village Hall.**

Further to the Pre-Application Consultation (PAC) for the **Marine Scotland Licence application relating to proposed works at Clydeport Operations Ltd Construction Yard** held on Weds 8<sup>th</sup> August 2018 at Fairlie Village Hall, as a community group of concerned Fairlie residents we wish to lodge a number a number of comments and concerns that relate to this specific PAC.

### **Planning and Strategy Concerns**

1. We wish it to be noted that we have reason to have serious concern that this PAC, along with the planning application/s that will follow, is just one small part of Peel Ports 'salami slicing' approach to conceal intended developments at Hunterston PARC. Salami slicing is a well-documented strategy that is systematically adopted by large developers, where the outcomes of their overall plan will be controversial, raise environmental concerns, or fall foul of local planning regulations if revealed in full. In this case we believe that Peel Ports are preparing the ground for the development of an industrial scale oil-rig and other contaminated marine vessel scrap yard, which is entirely at odds with national and local development plans for Hunterston as a sustainable energy hub and brings significant risks for the surrounding land and marine environment.
2. A noisy unattractive scrap yard would likely prohibit high quality renewable energy businesses from locating here with all the obvious advantages of the WesternLink feed.
3. The proposed work outlined in this PAC is located within the larger construction site, which has sidestepped the need for an Environmental Impact Assessment (EIA) before the decision was made by North Ayrshire Council (NAC) to allow a material change to be made to the permission for the site to include 'decommissioning'. It is unarguable that there is a significant difference in the greater environmental impact between the works of commissioning (fairly clean) and decommissioning (small airborne particulate including toxins and noise).

4. We noted with interest that the notice for the PAC referred to Peel Ports '20 year plan' for the site, lending weight to our concerns about a salami slicing approach to a bigger controversial plan. At the PAC a number of residents tried to find out more about this plan. The Arch Henderson representatives referred all questions on the 20 year plan to the Peel Ports representative, however he could not, or would not, tell us anything further. He did however explain that Peel Ports intend to bring Semi Submersible oil rigs beyond Hunterston to be cold stacked in Loch Striven. This in itself suggests that there are larger plans in place that are not being shared by Peel Ports with the community and raises our concerns further given the recently reported experiences in the Cromarty Firth area.
5. To compound this concern the promotional video of the onsite operator CessCon Decom <https://www.youtube.com/watch?v=AFMb9jmwgwU> clearly shows how oil rigs will be berthed and prepared at the 400m Hunterston coal jetty ready for bringing through the caisson gates and into the dry dock that this PAC relates to. We have been told by North Ayrshire Council planning office that there are no permissions in place for the coal terminal or the movement of oil rigs between the 400m coal jetty to the construction yard. Despite the assertion of the representative for Peel Ports that they did not approve the video by CessCon Decom it remains publicly available and in complete contradiction to the information the community has been told.
6. As such as a group we are seriously concerned, that this seemingly innocuous PAC to improve the facility of the construction yard dry dock, is a Trojan horse through which Peel Ports intend to drive an industrial scale, environmentally damaging scrap yard within 1km of Fairlie and that this development will affect not just the immediate marine environment and the quality of life of residents of Fairlie, but impact on the whole of the upper reaches of the Firth of Clyde up to and including Loch Striven.
7. It is understood that Peel Ports avoided the EIA due to consideration that this facility is not a port. We fail to understand how this cannot be described as a port.

#### **Our Questions and Comments:**

1. What steps have been taken to fully assess the risks posed to the immediately adjacent SSSI as result of undertaking the work required for the proposed development of the caisson gates and jetty? What risks have been identified and how will these risks impact on the immediate safety and long-term sustainability of the SSSI?
2. What is the evidence for the reliability of the proposed underwater banking structure to protect the SSSI from tidal erosion and storm damage? What examples exist of this approach being successfully used in similar environments? What are the risk tolerances are built into the modelling – ie what degree of risk to the SSSI is considered acceptable?

3. What impact will the enlarged dredged area have on the effluent flow from the existing coal storage area? A 1m discharge pipe from the settling pond area of the site discharges into the corner of the bay and there is direct visual evidence of discharging coal slurry from this source. Inadequate efforts have been made by the current site operator to prevent this slurry from travelling further into the SSSI, resulting in the makeshift boom arrangement already being breached.
4. What impacts will the noise and percussive disturbance of pile driving and other marine construction activity have on the resident bird and marine populations? We have concerns that Peel Ports's own commissioned noise assessment (EnviroCentre) is based on the flawed assumption of a percussive strike rate of 50/day. Given that the proposed structure requires over 120 piles to be driven, which in normal conditions will take 150 strikes to reach quality bedrock, to meet the conclusions of their own noise assessment the task will require 360 days to complete. We believe that there is a high risk that this timescale will be unacceptable to a contractor and raises the threat that a higher percussive rate would be required. If this is the case then we seek the agreement that the project will be the subject of a further noise impact study before work commences.
5. What will be the impact of removal and disposal of dredged material on adjacent SSSI and surrounding areas? What is the planned disposal method and which sites have been chosen?
6. How does this development fit within the 20 year plan referred to in the PAC notice? What further planning applications are currently in the pipeline that relate to the overall plan that this PAC sits within?

We have been in touch with a number of residents most directly affected by the development over the last 3 days and enclose community feedback in Appendix 1 which demonstrates the strength of feeling, level of anxiety and unanswered questions.

We would be grateful if you could confirm receipt of this email and provide explanation of how both our specific and wider comments will be responded to

Kind regards

The Friends of the Firth of Clyde

## Appendix 1 – Voice of Residents

### 1. AC, Largs

My name is AC from Largs. I am a keen sailor and have loved the firth of Clyde all my life (65 years) My father also campaigned 'unsuccessfully' to try and prevent the construction of the 'oar terminal' in the early 70's so I have an idea of what we are up against!

A major difficulty is that there are now hundreds of oil rigs that require decommissioning. Oil giants would happily decontaminate them and leave them to rot where they stand arguing that that this would be less harmful to the environment. They have also been stopped from sending them to underdeveloped countries for 'irresponsible' scrapping. It is environmental groups like Greenpeace that are insisting on 'well managed removal' that has brought about the need for the UK to look for viable decommissioning sites such as Hunterston.

Unfortunately this makes it difficult for successful opposition on the grounds of pollution as the whole idea of this development is to minimise environmental pollution by creating a first class disposal facility.

I personally hate the idea of seeing oil rigs parked in the firth of Clyde and the impact locally on industrialisation of the Hunterston peninsula. Choosing an area of scenic beauty used for recreation and tourism for this industrial process is in my opinion short sighted and commercial insanity. It is the detrimental 'commercial impact' on other resources such as global tourism and local business that might carry more weight than the impact on a small community such as Fairlie.

### 2. JP, Fairlie

I have four main concerns regarding the proposals to bring decommissioning of oil and gas structures to the Clyde.

1. There is an increased environmental risk posed to the whole western seaboard of Scotland by moving the structures through these exposed and often stormy waters.

There has already been the major incident of the grounding of the semi-submersible Transocean Winner on the west coast of Lewis in 2016.

The moving of structures over extended distances is contrary to industry best practice.

There are adequate existing and planned facilities which meet the Scottish Governments "Circular Economy" aspirations for decommissioning located much closer to the facilities to be decommissioned.

2. The proposal goes completely against many of the good "Green" aspirations for the coastal waters of the West of Scotland contained in the National Planning Framework 3 document which is the currently applicable publication.

2020 is to be "The Year of the Coast". There are many other Government financed initiatives in this area.

All these documents point out the obvious scenic qualities of the Firth of Clyde and its adjacent waters. For many tourists and users of these waters the gateway to all of this is The Firth of Clyde.

3. I am dumbstruck that North Ayrshire Council Planning Department considered that it was not necessary to carry out an Environmental Impact Assessment of the proposal submitted by Clydeport Operations Ltd. to change the use of the construction yard at Hunterston from "Construction" to "Decommissioning". This I believe shows a complete lack of understanding of the issues involved and requires to be overturned after proper scrutiny at a higher i.e. Government level.

4. The local community have no confidence that the required environmental standards will be met by the landholder Clydeport Operations Ltd. or by the operator Cesscon Decom.

Clydeport's historical performance has not convinced the community of its management commitment to meeting the highest environmental standards.

Cesscon Decom is a company formed in Scotland in January 2018 and has therefore no track record. Claims are made that its sister company in Norway Cesscon Decom AS provides evidence of experience relating to the Hunterston proposal, but in reality its operation at Hanoytangen north of Bergen is not yet fully operational.

All we have from Cesscon Decom are videos of fiction.

**3. LM, Fairlie**

Fairlie has had more than its fair share of pollutants, nuclear, iron ore, coal dust and ultra sound. It's time to leave us alone to recover from any further environmental contamination.

**4. HH, Fairlie.**

I can't believe the short sightedness of these plans, the deception in how they are trying to creep the development up on us, the lack of information given by the sacrificial turtles at the meeting at the Village Hall recently. Have Friends of the Earth or Greenpeace been informed? This is not just about Fairlie, this will effect the rest of the people of the Clyde - either as tourists as their beautiful holiday places will be destroyed or the many people whose lives and businesses will be affected along with the marine and seashore life that have this as their home. Without tourism, there won't be much here - or is that their plan?

**5. CG, Fairlie**

As a resident of Fairlie, I would like to voice my opposition to the decommissioning of marine vessels in this location. This community is not naive to the consequences of heavy industry - the legacy left by a nuclear power station on our doorstep, the disfigurement of the landscape from iron ore and coal processing, the carving up of and pollution to a Site of Special Scientific Interest. Decommissioning marine vessels in this area of outstanding natural beauty, is not an asset to this community. The lure of jobs does not offset the risks to the natural environment, nor does it mitigate or compensate for the blight on our landscape. In my view it is time for politicians and public officials to truly value the natural assets here and to serve the local community in protecting our environment while identifying sustainable job opportunities that come at less of a cost.

**6. RB, Fairlie**

These are the issues I wish to draw to Marine Scotland's attention.

- No marine life base line survey for the Clyde has been carried out and this is a pre-requirement before granting a permit
- A desktop marine survey is meaningless unless it is current and has attributable facts.
- Inshore Rig movements should comply with Safety Case Regulations 2005 explained in guidance document L30
- Permanent damage will be done to the seabed and it wildlife during the dismantling of the rigs. This is shown by EU accredited surveys that show for every 10,00 tons of steel recovered, 120 tons of melted steel and 2 hundredweight of paint chippings are lost and flushed to the sea bed.
- A safety case should be carried for the Toxic, fuel, mud, contaminated products and foreign species that may be released.
- Proper waste management controls should be annotated for the rig storage and the dismantling in the drydock
- Rig dismantling has a bad record for injury and death to the operatives. This should be an important consideration via a safety case being present.
- Consideration should be given to the removal and sale of components to third parties who have no invested interest in the oil rig decommissioning or dismantling. (Cranes, derricks. Helo pads, propellers accommodation/control modules, valves, wiring looms)

**7. RG, BSc,MSc,MIBiol,ACIWM, FLS., Fairlie**

This an area outstanding natural beauty where people from around the world come to relax and spend their leisure time. This reputation has been built up over generations. It is the basis of the local economy. The inevitable constant noise, gas and liquid pollution associated with large marine structures scrappage activity, through email, twitter and Instagram postings, would destroy this very quickly. The damage to our environment and very special wildlife would be environmental vandalism in an industrial scale.

**8. RE, FAIRLIE**

As with most of the residents of Fairlie, I am so frustrated at the lack of support our village receives from the 'powers that be'. Complaints regarding noise and dust pollution go largely unnoticed. If a complaint is made to North Ayrshire Council regarding the noise at Clydeport, a team will duly turn up around midnight on a given day to obtain noise readings. Usually though, the readings are taken

when the wind is in Clydeport's favour. When the wind is not in their favour and the reading is high, North Ayrshire Council refuses to take action hiding behind the 'they are working to the best practicable means' label.

Complaints to SEPA also mostly fall on deaf ears. Samples are taken and then returned with pitiful 'non evidence of coal' letters.

Clydeport/Peel Port have never been good neighbours and their inability to have a decent preventative maintenance programme has to play a part in the deaths of three of their employees over the past ten years and increased the noise levels.

Whatever goes in their application will be ignored once they get approval, 24-hour working will be the norm with no attempt to mitigate either noise or pollution.

Interestingly, Companies House reveals that Peel Port employs only 149 people in the whole of Scotland.

**9. GK, Fairlie**

I live in Fairlie - it is high time both local and national government stopped treating the people of North Ayrshire as acceptable collateral damage.

I am looking for a politician with vision and guts to get on with the process of having this part of the Clyde re-designated not industrial, and, if possible, part of a National Park. An area as beautiful as this should be treasured and cherished, not destroyed in the name of quick financial gain.

**10. RR, Fairlie**

The benefits of the planned industrial development being sited at Hunterston seem to be the use of an existing dry dock and quay, possibly some employment for local people, some tax income /planning benefits for the County Council, and of course the accumulation of grants and profits for Peelports, Cesscon etc.

The drawbacks appear to be the further spoiling of an attractive coastline in an area of outstanding natural beauty, unavoidable pollution of the environment affecting the sea, marine wildlife, the air by dust and smell, and the peace by metallic noise from cutting and movement - all impacting on the health of the local population and the likely reduction in tourism.

We are concerned that developments are proceeding while we are supposedly in the "consultation" process, rather implying that, along with the support from NAC and national government, the completion of this woeful blight on the Firth of Clyde is a foregone conclusion.

**11. Ms B, Fairlie**

I am extremely concerned about the environmental impact on the sea life over a large area. I am also concerned about the impact on transport through the village.

**12. Mr and Mrs H West Kilbride**

This development does not comply with any of the points above and does nothing for this area and adds no purpose to the North Coast.

If you appreciate the beauty of the Clyde and all its amazing creatures, visiting Largs and Fairlie beaches, Arran and cycling round Millport in the summer, this will destroy the area. Dolphins and porpoises are PROTECTED species! - why are you as NAC not taking cognisance of this. The major employer in this area is turning to tourism as we are loosing our old industries - we do not need an industrial waste ground!! We have marine life that are already endangered because of the testing of SEA Turbines. This will be an environmental disaster for Scotland and the west coast - noise and pollution will be unacceptable!!

**13. Mr and Mrs D, Fairlie**

On a strategic level I fail to understand the logic in the Scottish Government and NAC supporting this proposal. It seems they must be driven by the hope of jobs, but superficial evaluation would suggest

that the numbers positioned by Peel Ports are difficult to comprehend. Peel Ports have suggested that 250 full time permanent jobs will be created at this site in the decommissioning of vessels. However, a number of sources at Lerwick, a similar sized facility, have confirmed that 35 jobs exist. The Swansea decommissioning facility has publicly stated that decommissioning 1 vessel creates 25 jobs for only 12 months. £480k of grant funding for the creation of a few jobs is not a good business model considering the collateral damage.

I absolutely support responsible decommissioning, it is well reported that this is very dangerous and environmentally damaging work. I also firmly believe we have good regulations in the UK. However, a major weakness is the ability to enforce the regulation and it is widely believed that Peel Ports have a local history of violation. In particular, their history of fatal accidents at the coal jetty is absolute cause for extreme caution. In the last 3 years of operation there were 2 distressing fatalities and a number of very serious life changing accidents with only a work force of 85 employees. It is difficult for me to understand that while undergoing a fatal accident inquiry Peel Ports operational processes continued in an unsafe manner leading to a further fatality. Despite the significant profits made during operation, this large organisation was not prepared to support safe working practice. Compare this to EDI Nuclear Power Station, who have been in the local paper cutting a cake for 10 years no lost time accident.

This project absolutely needs an Environmental Impact Assessment. How can the full impact of the project be assessed unless the complete picture is strategically viewed:

- The marine environmental impact is extremely concerning to me. Donald Trump has destroyed 1 SSSI site, despite regulation. In the UK, I firmly believe we are very much aware of our broader long-term impact on the environment. Running this project without an EIA is appalling and if it goes ahead may be recorded in history as a very detrimental decision.
- The appreciation for new potential jobs needs to be assessed rigorously against displacement of jobs from other areas, such as tourism and perhaps more importantly the ability to host responsible industry at Hunterston.
- These projects are reputedly very noisy. We have recently been subject to the noise from the decommissioning of the coal conveyor, which would be a fraction of the detrimental noise created by decommissioning a vessel.

#### **14. EB, Fairlie**

As a resident of a Fairlie I am totally opposed to Hunterston being used as a site for the decommissioning of oil rigs or becoming a scrap yard of the resulting decommissioned units.

It will be an environmental disaster for the area due to the resulting airborne and water contamination. It will decimate the fragile tourist industry in the area, resulting in huge job losses in tourism and will provide only very few new local jobs.

This kind of heavy industry is not in keeping with an area as beautiful as the North Ayrshire coast and will cause huge environmental devastation for sea mammals and the local ecosystem as well as to the local human inhabitants due to the toxic nature of this industry.

North Ayrshire council and the Scottish Parliament have no right to force this on to the local environment and local community, and no planning or permissions should be given for this development.

#### **15. EK, Fairlie**

I live in the village and have done for over 10yrs, when I first moved here I was drawn to the village for it lovey views of the clyde and that it was a quiet place to live.

I was very sad to find over time that the traffic to and from Clydeport had significantly increased which was very noisy and disruptive for a time had to deal with being woken at ungodly hours in the night and wee hours of the morning with large truck rattling through the village not to mention the coal dust. Thankfully this has slowed down but not stopped but not being disturbed at unacceptable hours.

I feel if this decommissioning does go ahead this will be a real problem for the village on several levels.

1. Heavy traffic through the village at all hours which is noisy and unsafe.
2. Heavy shipping traffic on the Clyde, affecting the wonderful sailing events we hold here.
3. The noise of the actual decommissioning this will impact on the health of the villagers.
4. It will look unsightly, noisy and will affect tourism to this beautiful part of the country.
5. The ecological impact on our beautiful wild and marine life and fishing is of great concern.
6. I am not convinced this will bring the level of work to the area that it claims and to be honest if you weigh up the effect on tourism, environmental and the impact on the health of the people living in the area versus a 100 or so jobs is not worth it.

I am not opposed to bringing work to the area but there have been plenty of examples now of how a project such as this has had a negative impact to an area but it always seems to be profit over community and environment.

**16. M & LMcQ, Largs**

I wish to strongly oppose the proposed Decommissioning of old Oil Rigs.

I am concerned for the marine life and also the air pollution.

Living quite close to the sea and the site here in Largs, I am also concerned about the noise pollution from this work which is likely to be 24/7. It will also be a blot on our beautiful seascape!

I am also concerned that proper environmental assessments have not taken place and people have not had their opinions/objections taken into account and that this is being forced upon the people from surrounding areas for the next 25 years whether we like it or not!

**17. CS, Fairlie**

For several years, the local community has had to put up with excessive noise often extending past midnight and, on occasions, well into the night, due to operations at the Hunterston terminal. When coal operations were in progress lorries, sometimes approaching a 100 per day, trundled through our village, endangering children and elderly. The main road through the village is not suitable for this amount of traffic. Even today when the coal lorries are no longer in evidence, the traffic has increased excessively and large container lorries travelling in opposite directions cannot pass easily. We have long campaigned for a by-pass but to no avail. Land earmarked for a by-pass has recently been approved for a housing development.

**18. CA, Fairlie**

Peel Ports "is committed to preserving and protecting the national environment at Hunterston", why has an EIU not already been carried out.

The hundreds of jobs that will potentially be brought to North Ayrshire – Please specific more details of direct / skilled / unskilled and how many are to be filled by residence of the area.

Noise / Vibration - any proposed decommissioning will undoubtedly create levels of noise 24/7 detrimental to residents and marine life.

How is the coal jetty to be used? And why is Cesscons video showing oil rigs queuing at the coal jetty?

Why has the community not been involved in the process of regeneration of the Hunterston site?

**19. GL, Millport**

My name is GL and I live in Millport. The proposed yard is in full view of my front window. I have personally been quite interested by the wind turbines on the site and have had no objections to them. I am not anti development.

This new proposal is a very different thing.

For information, my background is as a marine ecologist and then polar environmental manager working as a specialist alongside the Foreign and Commonwealth Office at Government House in the Falkland Islands. I also worked many years ago at the then University Marine Biological Station Millport and know the waters quite well.

My first concern about this proposed yard is environmental impact. I understand that a decision has been made that a full Environmental Impact Assessment (EIA) is not required. I find that mystifying and think the decision making process could easily be subject to a Judicial Review to ensure that it was reached in a correct fashion. I would be very surprised if an application for Judicial Review were to be refused.

That there will be potential for adverse impact on the marine environment would I think be a given and not to undertake a full assessment must be foolhardy. Assessing individual projects is hardly a proper substitute as once the facility is in place it would be very hard to stop an individual contract. Further the EIA would of course be carried out by the contractor and be limited in its scope.

For now I request that the development is postponed until such times as a full and competent environmental impact assessment takes place and can then be scrutinised by all stakeholders including national and international NGOs. Should my request be rejected I would propose legal action to seek a Judicial Review in the first instance.

**20. AG, Millport**

I object to this proposal

**21. SS, Fairlie**

Millport has just been awarded the accolade of the prettiest town in Scotland. Well done Millport. It relies on tourism both on foot and from boaters for its income as does Largs.

The proposed oilrig decommissioning business has already said there will be no jobs bonanza and will use largely their own people.

Why destroy a thriving local tourism economy by replacing wonderful scenery and sounds of the seaside with an eyesore bringing grinding / cutting noises and who knows what other other pollutions.

It doesn't make sense either economically or environmentally. The rigs will have to be towed phenomenal distances to get here, at great cost and risk. Since we are an estuary, any pollution will have a greater impact here as it washes in and out – and back in again, destroying habitats and wildlife as it goes. A more exposed coastline with stronger currents and closer to the rig's current locations would surely be more appropriate – if indeed these rigs need to be decommissioned in this way. There is an argument for leaving them where they are and perhaps removing some of the structure at sea.

We hear that the Scottish government have allegedly given money to support this madness and one can only wonder why? North Ayrshire Council are largely SNP and appear to be towing the party line, approving planning permissions in small slices – no doubt hoping to push this through no matter the cost to the communities.

**22. RMcl, Millport**

Objection due to environmental fears.

**23. Ms B, Fairlie**

I strongly object to the proposed decommissioning site at Hunterston. In an area of great natural beauty, that is so reliant on tourism, it is appalling to site such an eyesore that will blight the coast for miles. If this is allowed to go ahead I also fear that the contamination of our waters will spell the end for open water swimming for myself and future generations.

**24. Mr and Mrs B, Fairlie**

The proposed scrap yard at Hunterston is beyond belief. Peel Ports, and their contractors, pay little attention to pollution as it is all profit focused. The pollution, either airborne, liquid, noise, visual, or vibration, will affect not only the local human population but all the current sea life. Although Peel Port will submit their application for 7am to 10pm working, this as previous, will be followed after a short period by the claim they need 24/7 working to be profitable, plus they will say it will generate employment – apart from a couple of low paid jobs, all prospective jobs will come from out-with the area.

If NAC approve this project, it will be a nightmare for the us, plus we will loose what current sea and bird life we have for the next 25 years– IS THIS ACCEPTABLE !!!

#### **25. R C, Fairlie**

I think it will be a disaster for the tourist business and the small businesses in the area and surrounding islands .... The sailing marinas and schools affected .... and the incredible marine life everyone has had so much pleasure from !

#### **25. KMacD, Fairlie**

I'm am fairlie resident with a young family concerned about the impact of oil rig decommissioning on our health and well being.

Fairlie coast is also haven to wildlife and I believe the rspb are involved in objections also.

We will no doubt be told of the job potential this peel port development will supply but at what cost, house prices will plummet if any one is even able to sell with the smell, dirt and noise that will be an everyday occurance for us.

People have settled with their families here to experience peaceful village life, I will certainly be fighting this development.

#### **26. Mr and Mrs P, Fairlie**

- How can a development of this magnitude be exempt from the submission of an EIA. It is suggested that development at Hunterston is classed as one that is Small Scale.
- Peel Ports seem to be relying upon their existing planning consent for the construction of vessels, however should this not be subject to complete review given the change of use applied for to take into consideration changes in planning regulation over time.
- Peel Ports have acknowledged that Asbestos is expected in the decommissioning of vessels – however it is not clear how they will prevent this from escaping into the surrounding environment – both marine and terrestrial.
- It is understood that Peel Ports intend to undertake piling works between 07.00hrs and 22.00hrs. Between the intended Jetty improvement there is no natural barrier to prevent noise pollution. This is totally unacceptable. In addition, what will be the impact of this on the marine environment within this area of the Clyde.
- The “promotional video” for the development identifies that “vessels” will be berthed at the existing coal handling terminal – however it is understood that they do not have any consent of permission for this and further the terminal is not designed to take such vessels.
- How is the SSSI going to be protected both during development of the facility and the operation of the facility – this is unclear.
- Little or no consideration appears to be given to the recreational use that is currently been made of the Clyde in this area. Sailing and Kayaking in the area is growing rapidly in the area and having “vessels” such as semi-submersibles and the like berthed in the area will not support such recreational use of the Clyde. In addition the movement of the caissons at the mouth of the dry dock will not support such activities.
- This area is a haven for sea mammals – seals, porpoises and the like what damage will be caused to their environment – particularly during any piling operations.

#### **27. CD, Fairlie**

I have lived in Fairlie for over 30 years and am horrified at the prospect of the former Marine Construction Yard site (and no doubt the jetty in Fairlie bay) being used for the decommissioning of oil rigs and other large marine structures. I appreciate that this consultation relates only to the extension to the existing jetty within the site. However because NAC decided against all logic not to ask for an Environmental Impact Assessment in 2016 before granting permission to decommission I have huge

unanswered concerns about the environmental impact of this development as a whole. In relation to the work involved in the jetty extension:

1) What will the impact be on the marine environment -we have eg seals, porpoises and basking sharks in the waters around Hunterston and at least one dolphin has made its home here, exactly what measures are to be taken to protect them, bearing in mind what I believe to be their extreme sensitivity to noise and the fact that they depend on reasonably pollution free waters for their survival.?

2) What will the effect be on the SSSI within the site? Even if the jetty extension falls outwith the area of the SSSI the proposed work at the jetty cannot fail to affect the wild bird populations living there - their habitat was designated as an SSSI for a reason -exactly what measures (it is hard to think of any which could be effective) will be taken to protect them?

3) what steps will be taken to ensure that these protective measures will be properly enforced, bearing in mind the complete and utter failure of Clydeport/Peel Ports over the years to do anything other than pay lip service to the concept of environmental protection?

#### **28. PC, Fairlie**

As someone who lives in Fairlie I have grave concerns regarding the proposed plans for oil rig decommissioning at Hunterston. There has been no Environmental Impact Assessment done which seems ridiculous as it is bordering a SSSI site. I would also have concerns about contaminants entering the water and air and causing pollution to the area.

In addition to the risks from pollution from materials affecting the environment and surrounding communities, I would also expect there to be a tremendous amount of noise pollution from a site which will be in operation 24/7.

I would hope the concerns and objections from communities who will be directly adversely affected by this plan would be given due consideration.

#### **29. LK, Largs**

I wish to strongly oppose the proposed Decommissioning of old Oil Rigs.

I am concerned for the marine life and also the air pollution.

Living quite close to the sea and the site here in Largs, I am also concerned about the noise pollution from this work which is likely to be 24/7. It will also be a blot on our beautiful seascape!

I am also concerned that proper environmental assessments have not taken place and people have not had their opinions/objections taken into account and that this is being forced upon the people from surrounding areas for the next 25years whether we like it or not!

#### **30. L B, Fairlie**

I am against the decommissioning scrapyards as I feel there is not enough research into the environmental impact. I would like to know what kind of impact there is going to be on pollution? Marine life?

#### **31. NM-S, Fairlie**

I am writing to strongly object to the proposed Decommissioning project planned for our village, namely at Hunterston and headed up by Peel Port.

The lack of information and transparency are by themselves alarming, but the scale of the proposed project is, I believe, severely damaging to our local, natural environment, public health and to the lives of the residents in the village.

I am only too aware of the need for economic improvement and increased job opportunities for this area, but not at any cost. The jobs promised will, in the main, be highly skilled and the local skill set will not fill these posts. There are not enough houses for the locals - where will the influx of workers be housed?

It is all very well to say that governing bodies will monitor activities and ensure that pollution - noise, metal particles, dust and other detritus- will be kept to below acceptable standards, but we as villagers have already witnessed numerous occasions where guidelines have been flouted. The Facebook page for Fairlie has posted many images of huge clouds of coal dust over the last few weeks - from the demolition of the existing coal jetty. This is under current guidelines - how are we to have faith that similar, if not worse, will not happen in the future?

An Environmental Impact Assessment is absolutely vital and Peel Ports cannot be allowed to 'salami slice' the project to avoid this.

Oil Rigs, the size of the Eiffel Tower will blight our landscape- a landscape that the Scottish Government is trying to sell to tourists as a perfect life, which is full of tasty food and drink, exciting outdoor activities and beautiful views. Of vast oil rigs, noisy demolitions and death to our SSSI status? How can these sit in parallel ?

I cannot speak for my neighbours, but as a tax-paying member of this community, I demand that NAC take a responsible attitude and ensure that the people who voted them into seats of import, get the information they ask for and that they halt this overbearing industrial giant in their steps.

We may be mere villagers, but we do not have heather in our ears, we are not NIMBYS and absolutely deserve to be listened to. I personally will not stop in my research until answers are given and we are listened to.

### **32. PF, Fairlie, North Ayrshire**

I would like to state that I am opposed to any proposed decommissioning of oil rigs in this area for the following reasons.

No Environmental Impact Assessment has taken place

I believe the the impact to marine life and the entire marine ecology system could be severely and irrevocably impacted throughout the region

Noise pollution and particle contaminants would have a devastating impact on local residents and areas of outstanding natural beauty

In addition to the aforementioned and from empirical examples both locally and nationally, I hold no faith that any conditions put in place shall be in any way adhered to by Peel Ports or any other interested party. I equally do not believe that there shall be any governance enforced or penalties delivered for non compliance.

### **33. KT, Fairlie**

It is inconceivable that such disruptive, noisy activity as dismantling of oil platforms, with all their known toxic material contained within can be undertaken without seriously, possibly catastrophically, affecting the fragile marine and coastal eco-structure of this beautiful coast with the SSSI and the wonderful variety of marine, bird and mammal residents.

### **34. Mrs K, Fairlie**

The decommissioning of 'large marine vessels' will not benefit anyone significantly in the Firth of Clyde Area, or the environment itself.

The long lasting pollution, and the ruination of the marine environment and unique and beautiful 'West of Scotland' coastline, alongside the Firth of Clyde, will be irreparable for the sakes of fat cat profits and political tick boxing.

The construction of the yard will require specialist employees with experience – how many of them are local? Very few. The on going decommissioning work is not as labour intensive as NAC and the SNP MSP want us to believe. Is such devastation necessary for so few jobs. Where will the profit be re-invested any way?

There are areas in Scotland that sadly are already constructing and/or decommissioning large marine vessels including oil rigs - use them and invest in protecting their environments from the long lasting impact of such activities. Don't create more problem areas.

### **35. Mr and Mrs B, Fairlie**

I and my wife live in Fairlie. My wife was born and raised in the village and I've been coming here for 50 years. We were married in Fairlie Parish Church and have a daughter, son-in-law and two grandchildren living in the village. Both grandchildren go to Fairlie Primary School. I think it's safe to say we have an interest in the welfare of the village.

It seems to me that the community has a golden opportunity and that now is the perfect time to clean up the mess left by the support of outmoded industry (the importation of bulk coal for coal-fired power stations), not to exacerbate the environmental destruction with yet more poorly controlled industrialisation (evidenced by past performance).

The argument that "we must use the deep water" is specious if its proposed use is adequately met elsewhere be it in Scotland or abroad. Surely, the image that Scotland must promote to the World is one of a country rich in beauty and heritage but with an industrial backbone of a high quality workforce, facilities and infrastructure, not one of a third world breakers yard.

If this proposed development does result in overcapacity or if Peel Ports have to compete on price because of their disadvantaged position on the southern West Coast, then corners will be cut in the obvious areas of pollution control and worker safety (again evidenced by past performance).

Remediating the site and then developing it in a sympathetic manner would generate real local jobs in the tourism sectors and high-tech, especially given the high quality of employees produced by the educational establishments both here and in the Central Belt, many of whom are local. Recreational pursuits such as camping/caravanning, fishing, bird watching, even cetaceans watching are just a few, even relocating the ferry terminal from Largs to ease congestion might be considered.

In this day and age, with its increasing awareness of conservation and with an eye on what kind of legacy we bequeath to our grandchildren, we should be working towards converting brownfield into greenfield sites, not generating yet more brownfield sites or worse. B

### **36. MB Fairlie**

My name is MB I am a teacher in the local high school and would like to raise the following points in regards to the decommissioning of vessels at Hunterston PARC in Fairlie.

- I want to know what the effects could be on the marine and terrestrial environments.
- How will it affect the scallop farm at Cumbrae.
- Why has there not been an environmental Impact Assessment for transporting of the vessels from site to the PARC?
- What the human impact will be, pollution, noise traffic etc..
- Who is responsible for then effects on transporting vessels
- What guarantees are there that the Lewis incident won't be replicated.

### **37. AG, Fairlie**

I was brought up in Largs and have lived here for almost all of my seventy-six years and it saddens me to see what is proposed for such an area where there is so many outdoor and indoor activities available to all ages.

I can remember it as it was with a beautiful beach and locals picnicking in the dunes.

Peel Port have never been good neighbours to the local residents. I can remember the problems of the verges being coated in coal dust, and the filth on windows and sills before trains were used. Now this same company are about to contaminate the Firth and surrounding land while these behemoths are decommissioned.

There are lots of questions and why is PARC not providing answers and engaging with those living in the area?

I should like to know whether it would be financially viable to bring the rigs such a long way, through dangerous waters to be deconstructed and whether Cesscom might be tempted to cut corners to make a profit.

They have admitted that there would not be many jobs, but would the additional jobs provided not be negated by those lost through the reduction in those no longer employed in tourism. Who would want to come to enjoy the outdoor activities, while the view is partially blotted out by these enormous structures and endure the noise 24/7 ?

As PARC are experts at 'salami slicing', after Brexit, would the strong E.U. legislation against it still be adhered to?

What is the point of having a SSI if it can be disregarded and destroyed by PARC and how will the seals and porpoises be affected by the noise and loss of habitat?

I realise that on such a large site PARC are looking for additional companies to establish themselves, would they and their employees wish to be surrounded by a very large scrapyard. Was any attempt made by the Scottish Government to encourage more environmentally friendly companies to come to this site?

There is no mention of using the deep water facilities to remove all the scrap, and we do not have the road infrastructure to deal with wide loads and the extra traffic.

If this goes ahead, will this be another 'white elephant' after all the disruption?

Like many others , I should like a lot more information.

### **38.GS, Fairlie**

I am so against the PeelPorts Oil Rig Decommissioning Facility and the affect it will have on our marine life and the environment.

Marine mammals such as porpoises and seals are extremely sensitive to underwater noise pollution. The increase of marine traffic and piledriving, will impact their quality of life greatly, and will cause fatalities. If these mammals are forced to leave the area, not only will we be losing the incredible diversity of marine life here in the Firth of Clyde, but they will be losing vital social interaction and communication with other marine mammals, and important breeding sites. Animals choose their habitat for a reason; it is not simply a case of packing up and finding somewhere else to hunt, breed and raise their offspring. The yard will in fact have a considerable impact on sea life, birds, cetaceans and crustaceans on the Fairlie sands.

Please stop this terrible thing from happening.

### **39. MT, Fairlie**

My Objections are that:

There are more accessible decommissioning sites in Scotland who would welcome the employment.

The impact of this activity on the environment is unacceptable. This is primarily a tourist area – bringing employment – and the activity is not conducive to the area.

### **40. AC, West Kilbride**

Whilst I would really welcome industry jobs in the area, I have concerns about the impact on sea life and don't want to see our coast line full of aging rigs and oil ships.

### **41. K T, Fairlie**

I am writing to register my concerns about the proposed decommissioning scrap yard. I have significant concerns about the whole proposal and I am particularly concerned about the lack of robust

measures to assess the environmental impact on people (and their health) and the natural environment.

I am writing to ask that a full and extensive environmental impact survey is undertaken that looks at the whole process and not just isolated activities to ensure all risks are assessed before any permissions are given to use the site.

I would also ask that alternative uses for the site that involve clean processes rather than polluting ones are considered.

This is an area of outstanding natural beauty. It needs to be preserved not only for our generation but for future generations.

**42. G W, Cumbrae**

I formally object via separate written document.

**43, GS, Fairlie**

I live in Fairlie Ayrshire and as a resident I am extremely concerned about the proposed Development by Peelports to have a decommissioning scrapyards on our door step.

We have suffered over the last 30/40 yrs with coal dust emitting from the boats unloading to the constant noise, none of the seemed to be monitored properly.

Fairlie is a place of outstanding beauty along with most of the west coast having both countryside and sea which in turn has exceptional marine life . seals, dolphins basken sharks to name but a few.

This area also relies heavily on the tourists especially Millport. To have the possibility of huge oil rigs Being decommissioned here is abhorrent. Apart from the constant noise the possibility of the toxins been released into the air that we breath

This is one of the most beautiful places to live and anything the effects our quality of life is an extreme worry from the air we breathe to the impact on the marine life on our doorstep. I have some points below that I would like answered.

I want to know the possible effects on our marine and terrestrial environments!! What will the human impact be with pollution and the noise emitting from the site!! We have a scallop farm on Cumbre, how will this affect them!! How will this effect the Marine and terrestrial environments!! Who will be responsible for effects on transporting vessels

I also insist on an Environmental Impact Assessment to be done.