

Gordon Craig  
Development Control  
North Ayrshire Council  
Cunninghame House  
Irvine  
KA12 8EE

Dear Mr Craig

**Hunterston Marine Construction Yard - Planning Application**  
**Variation of Condition 1 of Consent No. 16/00268/PP**  
**To allow use of the site for decommissioning of large marine related structures**

Cumbrae Community Council wish to make the following observations on the above application.

1. The application is contrary to NPF3 which states that "*..... Links with ongoing regeneration at Irvine through the Irvine Bay Urban Regeneration Company and its Life Sciences Enterprise Area will continue to be important. Future development at Hunterston should aim to make sustainable use of its key assets, including its deep water access. Activities which could align with our national strategy include manufacturing and servicing support for offshore renewable energy development, building on the success of the onshore test facility for offshore wind turbines. There is local support for coastal tourism development in the area, and the site owner, Clydeport, has its own ambitions.*"

Use of this site for decommissioning large marine related structures, which may include large ships, submarines, etc. as well as large oil related rig structures and platforms, would adversely affect any other proposed form of development, industrial or otherwise, at this site, particularly renewable energy based development, due to nature of work involved in decommissioning such structures. This may include noise, contamination, pollution, congestion and the adverse visual effect of storing these structures and huge amounts of the resultant scrap materials etc. pending the monetary returns being right for arranging for their disposal.

2. North Ayrshire Council's LDP1 Policy Ind 1: 6.10 states that "*.....it is known that it (i.e. NPF2) is to be replaced by National Planning Framework 3 in 2014. Particularly with respect to energy related development, where there are likely to be significant changes to the current framework, **it is important that the local development plan remains consistent with the national planning framework in force at the time**, and that any new proposal should be properly assessed against the relevant provisions of both the local development plan and the national planning framework current at the time.*"

The proposal will not therefore comply with the LDP as a result of the introduction of NPF3.

3. North Ayrshire Council's LDP1 Policy Ind 2: 6.13 states that "*The LDP policy will secure integrated development proposals for a complex mix of uses, existing and proposed. There is also a need to ensure that the environmental sensitivities of this coastal location are considered, and any measures necessary to minimise, mitigate or compensate for adverse effects on the environment or communities are provided. The precautionary principle may be adopted as set out in the General Policy.*"

It will not be possible for these objectives to be delivered if the site is used as a decommissioning site and giant scrapyards.

Policy IND 2 also lists the requirements that All Developments must comply with and if the site is to be used for decommissioning purposes it would not be possible to "safeguard the

wider potential for development within the designated industrial site" or to provide "deep water access from other parts of the site".

4. LDP 2 is still in draft form and not yet adopted however it refers to the need to ensure that the LDP be aligned "..... *closer with the ambitions of key national, regional and local strategies such as the Clyde Marine Regional Plan, National Renewables Infrastructure Plan, **National Planning Framework 3** and the Council's Economic Development and Regeneration Strategy .....*"
5. Although the proposed change to the existing consent initially appears to be a minor change of use, the "construction, repair and subsequent removal on completion of large marine related structures" is a very different operation to that of the "decommissioning" of such structures.

This proposal has been identified as a scrap market price driven operation as identified in Peel Ports Group's White Paper titled Securing a New Deal for Onshore Decommissioning November 2017.

Decommissioning will require the huge quantities of resultant scrap materials to be stored on site for indefinite periods of time pending the best market prices being obtainable (as per Peel Ports white paper Nov 2017).

These structures will also be contaminated and contain pollutants which will present a risk of spillage and environmental damage and which will also need to be stored/ transported with the associated risks that entails to the environment.

It is possible that the decommissioning process on the structures within dry dock may well be slowed down/postponed if the scrap market is not providing the necessary demand/ returns resulting in the surrounding tourist areas being blighted for much longer than necessary by the scale and size of these structures and their impact on the landscape.

In LDP 1 it states that the *"Storage of oil rigs, platforms and similar structures shall be restricted to those which are actively being decommissioned only."* It is likely that this decommissioning proposal, exacerbated by the scrap market driven process, will result in large numbers of these massive structures being moored/ "parked" (it has been estimated that upward of 470 such structures require to be scrapped ) within the vicinity of the site in the Clyde for indefinite period of time awaiting access to the dock. This will present the risk of a contaminated/polluted structure being blown on shore and causing an environmental and human crisis in an area acknowledged as being a special landscape area with several SSSI's in the immediate vicinity. This risk, and the visual effect these structures have on the landscape, will also have an extremely adverse effect on the essential tourism based economy in this area.

Finally it would appear that Condition 7 of the 2016 Consent also requires to be amended to reflect the proposal to also decommission structures.

Yours sincerely

on behalf of Cumbrae Community Council