

**From:** [REDACTED]  
**To:** [Sinead.Sheridan; CMPP\\_CHAIR](mailto:Sinead.Sheridan@CMPP_CHAIR); [scotland@mcsuk.org](mailto:scotland@mcsuk.org); [REDACTED]  
**Subject:** Request for Hunterston oil-rig planning decision to be considered by the CMPP Board.  
**Date:** 03 May 2018 17:49:47  
**Attachments:** Section\_12.docx

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Dear Isabel,

I am aware that under 'special circumstances' the CMPP Board may consider marine planning decisions before the final marine plan is adopted etc.

As such i would like to request that the CMPP Board examine the NAC Planning decision to turn a sand-flat notified SSSI into a deep water oil rig decommissioning harbour without the need for a full EIA.

I spoke to an environmental lawyer who suggested to me that this decision is contrary to principles in the Habitat Directives, OSPAR guidelines and contrary to Section 12 amendments in the Petroleum Act 1998. It is my understanding that this is also contrary to the ecosystem approach as outlined in Clyde Assessment and ethos behind the Clyde 2020 Vision.

The Petroleum Act Section 12 guidelines (attached below) clearly state that a full EIA is required for oil rig decommissioning proposals. The guidelines principally deal with decommissioning proposals for individual structures but also involves all marine aspects of 'cradle to grave' transportation, storage and disposal of structures like those now proposed for the Hunterston site. They are particularly relevant when oil rigs will be decommissioned near protected sites like sand-flat SSSI's or around critical habitats for mobile and protected species.

The guidelines were recently amended to counter exactly the set of 'planning circumstances' that have occurred during the planning process for Hunterston. The changes are included as a back stop to ensure that a full EIA is effected for oil rig decommissioning proposals and as a red line for environmentally unfavourable screening opinions and surreptitious use of delegated planning powers.

I find it bizarre that there is an assumption that there will be little impact to a sand-flat SSSI when the 'impact zone' around the SSSI will actually be dredged of the very feature it was notified for. I accept that the Hunterston coal terminal pier is a deep water jetty but the Hunterston construction yard is located on a nationally protected sand flats. This planning proposal is basically turning an environmentally protected shallow water site into a deep water commercial oil rig decommissioning harbour that could have undetermined environmental consequences for the Clyde.

I believe that the proposal for this large scale development should be something that the CMPP Board must scrutinise, as a special case, as it will have long lasting implications for the SSSI, mobile species and the wider Clyde ecosystem.

As you consider this request, i would like you to remember that Peelports refrained from informing you and other board members of the Marine Scotland pre consultation event for the proposed oil rig decommissioning facility. I am unsure of their reasons to withhold this information from you and can only suggest that it was to avoid environmental scrutiny from the other board members.

Please read the amended Section 12 Petroleum Act (attached below) and OSPAR principles on ecosystem approach and precautionary principle. I hope you agree that the proposal to develop and decommission oil rigs on a SSSI and in area abundant with European Protected Species requires a full independant EIA and social economic assessment.

For their information I have CC'd Sinead, [REDACTED] and Ross Greer MSP into this email.

Kind regards

[REDACTED]