

# West Kilbride Community Council

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Group Planning Director  
Peel Ports Group Ltd  
Maritime Centre  
Port of Liverpool  
Liverpool  
L21 1LA

24/06/19

Dear [Redacted],

## Hunterston Parc Master Plan Consultation Response.

We are aware that under NPF3 the Hunterston Parc Area is designated for Industrial Manufacturing, however, the re-industrialisation of the peninsula either by further construction or decommissioning must be accompanied by improved access to the peninsula as the A78 is now at the limit of its capacity where it passes through both Seamill and Fairlie. The inclusion in LDP2 which should be in line with NPF3 and not be an aspiration of NAC for the North Coast. A better plan would be to promote green energy technologies and other industries which address global challenges such as climate change and rising sea levels or de-industrialise the Hunterston peninsula and create a tourist bias approach to the existing site. This ambition ties in well with views expressed by NAC. As an Energy Hub both Nuclear Power Stations will be in decommissioning by the mid 2020's the Offshore Wind Turbine test facility had only managed to attract two turbines in five years the third site still remains unused. It does however provide the Construction Yard Site with a 'Grid Connection'. We would also seek a commitment from Peel Holdings to recognise their impact on our communities, infrastructure and services and to suggest and offer ways in which they could enhance the local area for the people who live here.

Our analysis by section of the Master Plan is as follows:

### Section 1

The Port and Resource Centre is designated currently as a strategic port and has fulfilled this scenario for nearly the last 40 years but in current condition is no longer fit for its original purpose. The coal importation having diminished to zero due to legislation and the cessation of use of coal in energy production. The Master Plan sets out Peel Ports aspirations not concrete proposals. To this end we are unable to respond in any truly meaningful way to what is being proposed. We would require considerably more detail on actual proposals when they become available.

### Section 2

What the history is and what of the future.

The History is that the whole site was reclaimed land to a greater or lesser degree, this was created by the removal of the "Blue Billy Bing" (contaminated slag from old ironworks) from Kilwinning to Hunterston in 1974/75. This predates SEPA so no analysis of what was deposited is available. This reclamation was on top of sand overlaying boulder clay. Not the most stable of foundations for significant construction.

The NPF3 designation as an energy hub may include turbine / solar fabrication and or construction.

This would however have to be transported by sea or rail to and from the site as the A78 transport link is incapable of taking any further traffic. It is appreciated that Peel Ports wish to utilise the port facility and not the road or rail options, but this has to be clearly stated on any planning proposal.

**Section 3**

The business vision for the future of the site is admirable in its outlook, however it concentrates exclusively on industrial job creation and the resulting economic benefits that this would have on the locality. It fails to recognise that the original concept of a manufacturing industrial site at Hunterston was based on a flawed forecast that they could make steel cheaply using imported raw materials and cheap electricity from the two nuclear power plants.

The area is rich in natural beauty and archaeology and the Hunterston site includes sites of special scientific interest which must be maintained irrespective of the outcome of any industrial development. An increase in tourism to the area would create significantly more jobs perhaps for a longer period than further short term industrialisation.

**Section 4**

The Socio-Economic impact of the proposals is that North Ayrshire does require employment, but it must be pointed out that modern industry is not labour intensive, due to mechanisation. The only sector where this is not the case is health care and tourism. We are not against industrial employment per se; however consideration on environment, transport of personnel, access to accommodation and access to leisure pursuits in the area now has to be seriously taken into consideration.

The impact of the potential developments that are proposed can be analysed as follows:

**LNG Storage**

Dr Jackie Pearson's letter, which you have already received, we think this clearly portrays the situation from an expert's point of view, which is strongly agreed by the surrounding communities, which would render the current proposal as presented, unworkable, not to mention dangerous.

Your clarification of the error in the quantities referred to in the Master Plan however still do not mitigate the risks involved locating this facility adjacent to a built up residential area.

**CCGT Power Station**

It has to be considered that the Scottish Government and the UK government are both endorsing a Climate Emergency and ban on the production of energy from hydrocarbon sources by 2030 in Scotland and 2050 in the whole of the UK. At a conservative estimate it would put the proposal for a Gas-Powered Generation Station as not an attractive financial proposition since it would only have a working life of +/- 20years. That is assuming that such a plant can be constructed at reasonable cost on the reclaimed site outlined in your proposal.

Current Government (both Scottish and Westminster) policy is to concentrate future power generation on renewables and to avoid wherever possible power generation from fossil fuels. No matter how efficient a CCGT power station is, it will still be using fossil fuels i.e. gas (methane) and thus will be a major contributor to both air pollution and global warming. There is a passing mention in the Master Plan to Carbon Capture. As far as I am aware, nowhere in the world has yet managed to construct and economically operate a large-scale Carbon Capture and Storage scheme in connection with power generation. CC&S is based on storing the captured carbon dioxide in exhausted gas and/or oil fields. The nearest gas field is Morecambe Bay and all current oil fields are in the North Sea. How do you propose transporting the captured carbon dioxide from Hunterston to either or both of these locations? If there is no LNG terminal and storage then one must suppose there is no CCGT.

**Train Manufacturing Plant**

In 2016/17 the company Talgo proposed constructing a train manufacturing plant and both Hunterston and Longannet were described as possible locations. Is this the Train Manufacturing Plant referred to in the "MasterPlan"? If so, then that train has already left the station. In November 2018, Talgo signed a contract for a proposal to construct a manufacturing facility at the site of the disused Longannet power station assuming that they got the contract. An updated press release from Talgo in April 2019 stated that they still had it in mind to submit plans for the train building plant at Longannet.

Do Peel Ports have any company other than Talgo in mind for a Train Construction Plant Hunterston?

If so, the Master Plan should be updated or otherwise the projected 1,030 jobs should be deducted from the total of 1,737 a reduction of 60%. A Train Construction Plant would probably be acceptable on the Hunterston PARC site provided it was fully under cover and did NOT require the raw materials for manufacture to be brought to the site by road.

### **Modular Manufacturing**

This would appear to be reasonable, provided it was done under cover. Again, transport by road of raw materials and finished product should be disallowed unless very substantial upgrading is done to the local network linking Hunterston to the nearest dual carriageway/motorway incorporating some form of bypass of West Kilbride. This would be approximately 20 miles of new road. After discussion at the Fairlie Exhibition you stated that you were looking at prefabricated buildings the raw materials being brought by barge to the site and the finished buildings being transported from the site by barge. This is only feasible on specific contracts where seaborne access is available. Remembering that this is a Master plan for 20-30 years.

### **Concrete batching**

Production of concrete slabs for the extension of Heathrow would be reasonable (unfortunately no more than 20 jobs being projected). Again, raw materials in and finished product out, could only be by sea. However, as the Heathrow Master Plan proposal has only now 18/06/19 gone out to consultation the expansion of Heathrow is by no means a foregone conclusion, and would not be in a position to start before 2025/2030. It should also be noted that concrete production is not altogether environmentally friendly, it produces a lot of CO2 during manufacture and is not biodegradable.

### **Marine Construction and Decommissioning**

At present, this is the only section of the enterprise which has so far received planning permission and that only extends to the Caisson gates and the extension to the small jetty. There have been rumours that a company called CessCom Decom Ltd (a brass plate trader with no experience in this field and an asset value which extends to the share value only) plan to decommission oil rigs at Hunterston PARC. We would still have reservations about this type of use. Construction of either steel jackets or gravity bases for Wind Turbines would be much less controversial, creating significant employment and conforming to NPF3.

### **Aquaculture**

Sea based fish farms have been in operation in the West of Scotland for a goodly number of years. Their products find a good market and there is no reason to doubt that a land-based fish farm would be successful. However opposition is growing in society to factory farming which has a poor reputation both in the welfare of animals and the long term use of antibiotics. At the planning stage we would be seeking assurances that any new process would address these concerns.

### **Plastics Recycling and Storage**

At present there is a shortage of plastic recycling plants in the UK, so this could be an industry of the future. It might be worthwhile getting some more detailed information on the pros and cons of plastic recycling. BPI for instance produces a sizeable quantity of the polythene used by farmers to store silage for animal feed. They also produce sheet polythene which is used to cover and bring on early crops. We believe the company also operate a collection and recycling operation for this polythene after it has been used. The production of new plastics is also dependant on availability of supply clean pellets and of availability of steam generation for economic production.

**Section 5**

Transport and Marine policies are clearly laid out as you say in government documentation. Locally however planning is constrained by LDP2 which has as yet not been approved by Scottish Government Reporters and which will not be available for some time. The new Planning Bill (2019) Scotland also includes changes that LDP's should be for 10 years not as currently 5 years.

North Ayrshire Council in their submission to LDP2 as you say state that Hunterston is identified as having potential for employment, however there is no proposal that fulfils this potential currently available to Hunterston Parc in your forecast, given the requirement for external UK Government decisions on extensive infrastructure developments are still at the planning stage and may be cancelled.

North Ayrshire Council are also proposing that the Hunterston remains in NPF4 which has yet to be put out to consultation the decision again subject to Government (Scottish) inclusion or not.

**Section 6**

Environmental considerations to development are as you state to be upheld. But it must be stated that to date you and your tenants do not have a perfect record with SEPA regarding environmental concerns and the HSE regarding safety at the site.

This raises questions as to your contracts with possible tenants to ensuring future compliance with environmental controls regardless of which industrial activity is being proposed.

**Section 7**

Transportation to and from the site is one of the main concerns. The road infrastructure is totally inadequate plus the close proximity of people's homes to the trunk road. The only acceptable transportation of materials is by sea or rail. Any other method is unacceptable by the local communities. The original plan for the development of the Hunterston site included the construction of a link road to the Garnock Valley or to the A78 south of Seamill. An example is the link road from Loch Lomond A82 to Garelochhead which was built for the construction of the Faslane and Coulport naval bases. A similar relief road would be required to facilitate road transport for any major industrial development.

**Section 8**

Stakeholder engagement it has to be acknowledged has been set-up for the marine construction yard site and it would be appropriate that this is expanded to include the Hunterston Parc proposals. Although we recognise your recent efforts to more fully engage with our communities, it should be noted that the consultation on this proposal was only exhibited, with staff to answer questions raised by the public, at Fairlie and Millport. No such exhibition was held in either Largs or West Kilbride, both of which would be significantly affected by what is proposed.

**Section 9**

Implementation of the plan must take into consideration the points raised by the community as they have to live with the outcome.

We trust that the above response to the Hunterston Parc proposals will be taken into consideration in your decision making process.

Yours sincerely,  
For and on behalf of  
West Kilbride Community Council,

