

Hunterston PARC

Development Framework
October 2021

Summary of Consultation



1. Overview



Summary

This document builds on the consultation document produced in February 2020, which in turn was drawn from the major May 2019 consultation on the Hunterston Masterplan.

Consultation on Hunterston PARC development framework began on the 1st – 30th September, with the framework put on the Hunterston Parc website.

A press release via social media channels and an e-mail was also sent on 1st Sept to 152 people initially including local community councillors and national MPs and a re-send on 22nd Sept was sent to 167 people identified as additional identified interested parties.

The consultation was also on agenda at the Community Liaison committee on the 23rd September with the local community council representatives attendance and a reminder was given.

In total 14 individual responses were received with most concern around potential vessel noise, the consented Marine yard decommissioning and the ‘lack’ of infrastructure. Below is the analytics showing the reach of the email to targeted interested persons and bodies.

Launch e-mail: 1st September

- 26 unique opens
267 opens in total
- Document was downloaded 12 unique times
51 times in total

Re-send: 22nd September

- 31 unique opens
663 total opens
- Document was downloaded 7 unique times
41 downloads in total

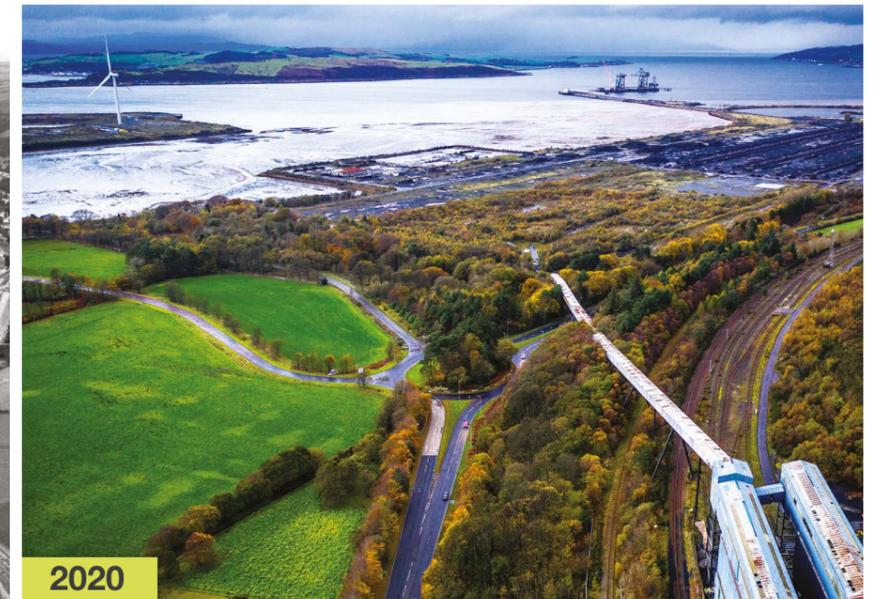
Website

- Document downloaded 14 times

A summary of the comments received during the consultation process and the responses from Peel Ports are provided below.



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2. Responses Received

Issue:

Access. Traffic.
Disruption

Hunterston is not well served by infrastructure
Transport links from the south are inadequate.
The rail infrastructure is inadequate.
Commuters will not be able to travel by train, and it is not viable for freight use.
There is a lack of road safety for pedestrians on the A78, with no safe crossing points anywhere between West Kilbride and Fairlie despite the installation of a cycle path.
(Jetty) should not be used for night-time working as it is too close to people's homes.
As with 'other' proposals, the Jetty is, simply, **TOO CLOSE TO PEOPLE AND THEIR HOMES**, for 'operations' / 'activities' of this nature.

Response:

Access. Traffic.
Disruption

Hunterston PARC benefits from excellent infrastructure in terms of its connections to rail, road and sea. Should any off-site upgrades be identified via future transport assessments which may identify enhancements required we would look towards strategic transport agencies to effect any improvements. As an example what has been achieved elsewhere in Scotland, primarily the Ravenscraig site which has £120 million in public sector funding allocated to support infrastructure connections for all users in the area.
Since this consultation, funding from the UK Government Levelling Up Fund has awarded £23.7 million to North Ayrshire to upgrade the B714 providing direct and better connections to Glasgow.
Pedestrian crossings on the A78 would be for Transport Scotland or North Ayrshire Council to consider.
Hunterston has been a successful working port for decades and our ambition is that it should continue to do so as part of the green economy. Tides, weather and other factors mean that ports are not 9-5 operations.



2. Responses Received



Issue:

Flooding and Site Drainage

It is quite sufficient in a Masterplan to state that surface water runoff from the site will be managed in accordance with current best practice as regulated by SEPA.

Flooding from high tides and waves does need emphasis. Current predictions of extreme storm events (including climate change) should be given together with an indicative plan of those parts of the site, if any, which at current levels are at some risk from sea flooding. Brief mention should be made of how any unacceptable flood risk might be managed, e.g. by land raising.

The Development Framework and the approved 2018 Shoreline Management Plan for Ayrshire, indicate that additional coastal defences will be required to safeguard the PARC site from future impacts of a changing coastal dynamic.

The Development Framework needs to consider potential sea-level rise and coastal erosion impacts. Utilising the Dynamic Coast data sets (<https://www.dynamiccoast.com/>) would help analyse risk to 2100. The Framework should make reference to further analysis, including modelling and cost-benefit analysis, in order to fully assess all adaptation options for coastal defence, including nature

based solutions. This would ensure that the most appropriate/cost effective approach is taken to deliver the vision of the Development Framework.

Response:

Flooding and Site Drainage

We are committed to creating an excellent environmental strategy, taking advice from our independent consultants Envirocentre, which we believe will address the comments made on this topic.

On flood risk strategy, we will strive to achieve any regulatory requirements or best practice standards set out by SEPA.

We note and will incorporate content from the documents highlighted: the Shoreline management plan 2018 and the Dynamic Coast data sets; both of these will help shape the modelling for Hunterston PARC.

2. Responses Received

Issue:

Noise / airborne dirt

Noise, airborne dirt, and constant activity at the site will be detrimental to the quality of life and health of people who live downwind or near to the site. Any and all developments on the site should give due consideration to the surrounding residents from a noise, visual, infrastructure and environmental impact perspective which should be covered by EIA and planning controls.

My main objection to the proposed cable manufacturing venture is the noise that the ships on the jetty will create. As you know there have been numerous complaints regarding noise even from ships that are just parked and not engaged in loading or discharging operations.

Fairlie is primarily a quiet village and I think it's a shame that more isn't being done to reduce the noise impact coming from the ships. I believe that if you curb the issues with the noise then the so-called 'NIMBYS' won't have a leg to stand on in a manner of speaking and ultimately stop the back-and-forth communication which I understand must be getting tedious.

I am asking you to please consider the option of using shore power to reduce the noise and also airborne micro particle pollution.

Response:

Noise / airborne dirt

The environmental impacts will be considered on an individual process by ourselves and any operators. As well as this, the planning application process and environmental regulations will determine the need for any conditions that the development and operators will be required to comply with.

We are exploring all avenues for being able to provide ship-to-shore power. We understand the local community's interest in this and are committed to introducing it if at all feasible.

Issue:

Oil Rig Decommissioning

I note that 'oil rig decommissioning' appears to have slipped down the 'rankings', in terms of potential uses. Given the significant publicity that this received in recent years, I would have thought that this would have been worthy of some comment.

The outstanding universal concern was that oil & gas decommissioning was still listed in Annex B as a possible use of the Marine Yard.

While we understand that any development on the Marine Yard site and most proposals for the Jetty and Coal Yard will require individual EIA's and subsequent planning approval the level of local concern about rig/ship decommissioning is ongoing.

No mention is made of the yard being suitable for ship recycling. Is this still an option?

The drydock, with a gate and jetty, is very well suited to a recycling facility especially if the construction of offshore renewable structures at Hunterston is unlikely at present

Response:

Oil Rig Decommissioning

Our proposals for Hunterston PARC recognise that the site is capable of providing decommissioning services, and such activities for our Marine Yard have existing permissions.

The Marine Yard is a major asset and it is in the national interest to maintain its viability to provide a vital service to industry.

Marine construction and decommissioning remain options for activities at the site.

2. Responses Received



Issue:

Site Conditions. Biodiversity

The local area includes an SSSI and is very important for wildlife, particularly for seabirds.

We support the move towards a more circular economy and the broad focus given to promoting the green economy in the future on-site industries.

Whilst we understand that there is limited detail on what these industries will be, as the development progresses, care must be taken to ensure they avoid contamination to the marine environment, as well as the local sensitive areas such as Southannan Sands SSSI.

We broadly welcome the vision set out by the Development Framework to position Hunterston PARC as an example of best practice in the redevelopment of a strategically important brown field site embedded with a focus on enhancing natural capital, green infrastructure and biodiversity, whilst developing new renewable technologies and circular economy approaches to de-carbonising Scotland's infrastructure.

We advise that a landscape framework for the site is developed and agreed as part of the

final Development Framework which takes into account the wider implications of both the SDA (Strategic Development Area) and the Natural Capital Assessment currently underway. The landscape framework should provide a set of landscape principles, including objectives related to the ecology, cultural heritage and the landscape setting of the site.

It should also contain a set of parameters and objectives within which successful site design and place making can be created. We agree that such a Landscape Framework should be for all future occupiers to sign up to.

The Development Framework correctly identifies the key specially protected sites within the immediate vicinity of the port. It should be noted that it may be possible that impacts from development proposals, both individual and cumulative, may have impacts on specially protected sites beyond the 5Km threshold. These will require consideration on a case by case basis.

The current proposed reuse of the EXXON site in West Dunbartonshire provides a good model for how such a Framework could be developed. We recommend that the Landscape Framework also includes a biosecurity plan.

In general, in terms of driving a landscape design approach for the site, we would encourage delivery of integrated and multi-functional blue green infrastructure.

This could be achieved by developing the landscape framework with a focus on the following themes:

- Sense of place/identity/setting
- Nature based solutions
- Habitat enhancement and connectivity
- Integrated surface water management
- Biodiversity and providing a nature-rich place.

We advise that effective community involvement sits at the heart of the creation and revision and implementation of the Development Framework. This will help connect people and nature along the coast and help fully integrate this strategic site with the local community.

One aspect of this could be to ensure community representatives are involved in helping to manage the natural capital assets associated within the PARC site.

Response:

Site Conditions. Biodiversity

The SSSI is a protected site and we are committed to enhancement to all of the 700 acres which border the industrial site. This can be in the form of tree thinning to improve health, bat boxes etc. We will seek advice and potential partnerships with RSPB and NatureScot to do this in the best manner for overall biodiversity.

We also agree that nature based solutions are our future and we will wholly commit to habitat enhancement on the 700 acres mainly with thought given to providing green corridors across the industrial part of the site.

We are actively working on a programme to improve biodiversity on the overall site and have commissioned specialist support to help us with this. We will also seek advice from organisations such as RSPB (which we already work with) and NatureScot.

We acknowledge the comment that community representation in managing the natural assets would be a way forward and plan to discuss this at future liaison group meetings.

2. Responses Received

Issue:

Connectivity via footpaths

The intention to include additional footpaths within the site is very welcome. Not so welcome is the statement that cycle ways and footpaths will be protected from development 'if they are deemed essential to biodiversity', which suggests that they will not necessarily be protected even if they are well used by local people for recreation.

A clear statement is required that existing public-usable paths along the north, east and south perimeters of the site will not only be protected but maintained. The image on page 10 shows a large part of the site, i.e. the enclosed lagoon and its edges, to which the general public has had no access.

Opportunities exist for new paths on the southern edge of the site where the wooded area and nearby shore are to be protected from development. At present a high security fence prevents access to this natural woodland and it would be helpful if the Master Plan made reference to this undeveloped area being opened up so as to provide a further small benefit to the local communities.

Another long-standing complaint of local residents is that the Hunterston industrial area severely restricts public access to the shore

bordering much of the seaward side of the area on its south side, especially when much of that shore still exists relatively undisturbed by the site development. A statement about improving access to the shoreline would be welcomed.

Particular care should be taken when developing pedestrian access routes around the site for both recreational and business uses, as these can lead to disturbance of the species using the SSSI. We would be pleased to help advise on how the natural capital of the site can be enhanced

The indication on the plan of potential public amenity routes (blue hatched) is welcomed and strongly supported. Some local residents might say, of course, that these could have been formed at any time since the site was first developed -but better late than never! The Master Plan should indicate the existing low and high level 'mounding paths' referred to above.

Clydeport providing 'help in kind' for the 2016 refurbishment of the mounding footpath.

Response:

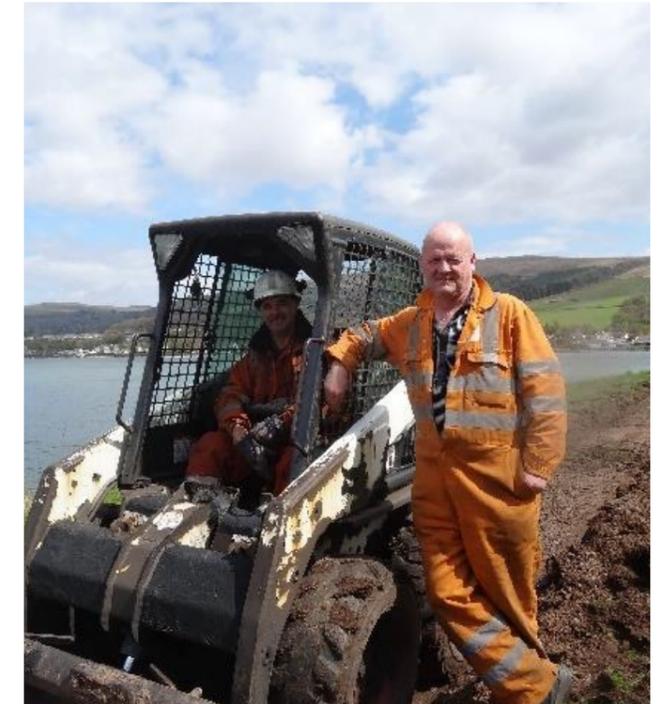
Connectivity via footpaths

Our intention is to preserve existing footpaths and as the comment notes to extend these.

We are keen to further discuss the refurbishment of existing footpaths with the community.

The only factors that would lead us to review recreational routes would be for safety and security.

Access to the Shoreline would have to be considered in dialogue with NatureScot, especially considering the potential for human disturbance on wildlife generally and the SSSI. We are open to having this discussion.



2. Responses Received

Issue:

Marine interface

We would expect the project to comply with all maritime legislation, including the appropriate licensing and consenting processes under the Marine (Scotland) Act 2010.

We would also point developers in the direction of the Port Marine Safety Code (PMSC), which sets out a national standard for every aspect of port marine safety.

Response:

Marine interface

We can confirm that Clydeport Operations Limited, as part of Peel Ports Group and the Statutory Harbour Authority for the Hunterston area, has recently completed the MCA sponsored PMSC compliance exercise and after external audit by ABPMer have reported we are compliant with the code.

As an authority we are also engaged in the regular formal risk assessment process to establish and/or validate the provision of pilotage service, vessel traffic management service and aids to navigation - this exercise will include the Hunterston terminal.

Issue:

Design and Layout

(The) cable manufacturing facility footprint that appears to conflict with that indicated in the September 2021 Draft for an Incubator Campus. That the proposal envisages a start on construction before the Master Plan can possibly be finalised and approved only reinforces that view.

Response:

Design and Layout

The document we produced is a development framework rather than a complete, fixed view of the future of the site.

The framework aims to capture the overarching principles for the site's development, helping to guide our work and that of any occupiers and operators. It also provides transparency of our intentions to the local community and helps us to have a meaningful conversation with stakeholders.

The framework cannot specify exactly what development will take place. This is subject not only to a wide range of commercial factors, but also all the different planning and regulatory processes that will apply to any detailed proposals.

2. Responses Received

Issue:

Support for the PARC

The proposal for a Hunterston Parc Campus and Incubator is welcomed and strongly supported. North Ayrshire has considerable expertise and experience in nuclear plant decommissioning and there is the possibility of similar expertise being gained from the recycling of redundant oil and gas infrastructure.

These are skills of importance for many years ahead and together with renewables research and development must be exploited in North Ayrshire. Have those involved in the decommissioning of the two Hunterston nuclear power stations been made aware of the Incubator proposal?

The proposed location at the north side of the site is supported as increasing the separation distance between the residential area of Fairlie and the industry site.

While Hunterston is not in my constituency, the project holds real potential for North Ayrshire and indeed the whole county, as indeed do the projects at Prestwick Aero-Space Park.

Response:

Support for the PARC

We also support the need to harness the current workforce and the capabilities that they hold. North Ayrshire deserves to have quality jobs which provide for the local community.

We also see Hunterston as a catalyst for North Ayrshire as part of the wider Ayrshire growth deal and beyond and support other schemes which will also help deliver prosperity and good jobs with living wages.



CGI - Illustration only



CGI - Illustration only

2. Responses Received

Issue:

Other issues

Jetty is not designed for liquid bulk and should not be used for that.

The 'Options' presented reflect a very narrow view of the site's potential, since they only relate to a set of well-trodden industrial uses.

Other 'Options', such as those relating to the regularly raised 'tourism opportunities' and their related economic/environmental benefits are given no mention.

The wish of the communities, is "to return to, original state", "create a wild-life park" - sort of 'thing'.

Response:

Other issues

The jetty provides the capability for normal port uses, which includes handling liquids, typically using a pipe as at other ports.

The site is designated as a strategic development area. Other options, such as tourism, were discounted by North Ayrshire council and the Local Development Plan 2 reporter.

The site was originally developed at the cost of an equivalent of £600million today. It is a hugely important asset in Scotland's progress towards net zero and addressing the impacts of climate change.

Issue:

Covid rules on Consultation

Consultations such as this appear to be the accepted norm while Covid considerations continue, it is by no means ideal.

With no paper documentation available, no public walk-in exhibitions or open discussion and relatively poor advertisement of the draft doc. Many in the local population are no doubt completely unaware of this consultation.

This apart from the fact that there are those who do not have access or the ability to view and respond online thus being excluded from consideration.

Response:

Other issues

Covid has impacted on the ability of all organisations and individuals to take part in consultations as they normally would.

This process started pre-pandemic. The Masterplan consultation of 2019 included a six-week consultation and a series of events which we found very insightful. There were 80 comments received which were then drawn together in a consultation report alongside a poll taken by the local action group Friends of the Firth of Clyde.

We do hold a biannual meeting with local community representatives and encourage the community to channel their questions and comments through this liaison group.

Outside of this we are contactable on the HunterstonParc@peelports.com email address.

2. Responses Received



Issue:

Additional comments

As advised in our response to the master plan consultation in 2019, we suggest that it would be beneficial to undertake a Strategic Environmental Assessment (SEA) to support this plan. An SEA would demonstrate that the potential impacts arising from the different development options have been anticipated and that mitigating factors have been considered in the final allocations. It would also assist statutory agencies with the adoption of the master plan.

We also recommend that an Environmental Impact Assessment (EIA) is carried out for the whole area of the Development Framework. A holistic site based EIA approach would review operational impacts of the proposed projects as they are currently indicatively zoned. It should include consideration of cumulative impacts arising from multiple activities, potentially under different consenting regimes, proposed for the PARC site.

The aim of this would be to ensure that the likely environmental effects of the proposed Development Framework are fully understood and is a means of assessing the likely significant environmental effects on the sites natural capital assets.

I hope you find the above comments helpful.

Issue:

Additional comments

We would welcome further opportunities to discuss options to demonstrably improve overall biodiversity and mitigate and adapt for impacts of climate change and for inclusive community involvement in this crucial site for commerce and the environment.

Response:

Additional comments

A Strategic Environmental Assessment was conducted by Peter Brett Associates (July 2018) before the adoption of Local Development Plan 2 by North Ayrshire Council.

This included Strategic Policy 2, with Hunterston being one of a number of strategic development areas.

Other sites in Scotland such as Ardrossan (also in North Ayrshire) and the Exxon site at West Dunbartonshire undertook a series of reports to support the work at the sites without an overall Strategy Environmental Assessment. We intend to also do it in this manner.

With regards to a whole site Environmental Impact Assessment, as the site is already zoned as a strategic development area we do not think this is required. We aim to support North Ayrshire Council and future tenants in determining a suitable pathway based on the potential changes and impacts each individual scheme will bring.

Cumulative impact will be considered by North Ayrshire Council case by case and this will be accounted for in future planning applications as is normally the case.

Response:

Additional comments

We understand concerns regarding natural capital assets. It is worth noting that only 320 acres of the site is industrial in nature having been previously developed. The remaining 700 acres is deemed to be protected via SSSI and TPO along with other designations. We are open to working with our statutory partners and communities to enhance those natural assets.

