

SUBMISSION FROM NORTH AYRSHIRE COUNCIL

The Executive of North Ayrshire Council considered a report on the National Planning Framework for Scotland 2 at their meeting on 6 January 2009. It was agreed to express the following views:-

North Ayrshire Council recognises that the policies set out in NPF2 support the key aims for the development of Scotland to 2030. There appears to be a satisfactory balance between economic development and environmental protection. The profile of Ayrshire has been enhanced from that contained in the discussion draft and is broadly welcomed.

North Ayrshire Council is aware of the significance which NPF2 will have in the planning process and particularly the presumption in favour of National Developments. Accordingly, they are concerned about a lack of precision in the definition of National Development at Hunterston. Paragraph 104 of the document identifies the project as "new power station and transshipment hub at Hunterston". The statement of need is set out in the annexe. This annexe repeats the title of the project as "new power station and transshipment hub at Hunterston", however it describes the development as "clean coal fired power station, container transshipment hub, maritime construction and decommissioning yard, and associated energy and industrial development." It then continues to list elements covered by the designation as:-

- carbon capture ready coal fired power station and fuel storage yard;
- biomass/gas fired power station;
- container transshipment hub;
- maritime construction and decommissioning yard;
- downstream industrial processes;
- associated environmental works

In the absence of any legal definitions of "clean coal" or "carbon capture ready" the annexe creates considerable uncertainty particularly when read in conjunction with the Environmental Impact Assessment Scoping Report

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prepared by Enviro Consulting Ltd on behalf of Ayrshire Power Ltd for a proposed multi fuel power plant. North Ayrshire Council received this as a consultee of the Scottish Government Enterprise, Energy and Tourism Directorate. This report claims that "on coal alone, the current technology would reduce carbon emissions by up to 25% compared to conventional coal fired power stations." The report also states that "CCS technology [carbon capture and storage] will be installed once technically and commercially viable. The development would therefore initially be built Carbon Capture Ready (CCR)."

North Ayrshire Council accept the need for electricity generating capacity and the opportunity which Hunterston offers, however, the lack of precise definition does not assist in forming the clear view on the implications of the National

Development designation. It is recognised that in producing a plan for the period to 2030 there will be uncertainties particularly in relation to new technology. The annexe includes within those matters to be addressed when consent is sought "carbon capture readiness". North Ayrshire Council considers that the NPF2 must recognise that carbon capture and storage while intended to be implemented at the earliest opportunity may only be expected to be installed once technically and commercially viable. At present there is no test of either technical or commercial viability. North Ayrshire Council is aware that the Scottish Government's Energy Consents Unit is currently consulting on draft guidance on the consenting process for thermal power stations in Scotland. This might result in reducing uncertainties particularly if it were clear that the consenting process would include robust and enforceable conditions which would ensure that carbon capture and storage was implemented either initially or retrospectively and the degree to which carbon dioxide and other pollutants were reduced. North Ayrshire Council considers that NPF2 should provide more specific assurance regarding the implementation of carbon capture at Hunterston than is presently contained in the document.

The identification in the annexe of elements covered by the designation show two separate bullet points, one referring to carbon capture ready coal fired power station, the other referring to biomass/gas fired power station. This would seem to imply that there are two separate power stations, however, this is not indicated in the description of development in the same annexe. North Ayrshire Council would request that this matter be clarified and that if a separate biomass/gas fired power station is to be included then similar issues relative to carbon capture and storage should be addressed.

The description of the National Development at Hunterston in the annexe includes "maritime construction and decommissioning yard". North Ayrshire Council accept that a construction yard presently exists at Southannan Sands, Hunterston and that this has current planning permission for the construction, repair and subsequent removal on completion of large marine related structures and for no other purpose. North Ayrshire Council are not satisfied that NPF2 has demonstrated any national need to extend a presumption in favour of decommissioning work. Any presumption in favour of decommissioning could lead to controversy such as was encountered at Hartlepool with US warships. North Ayrshire Council request that reference to decommissioning be deleted and that for the avoidance of doubt the reference to

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marine construction should state "and for no other purpose" or should expressly exclude decommissioning and ship breaking.

North Ayrshire Council note the reference to ensuring adequate capacity to accommodate rail freight traffic in relation to the West of Scotland Strategic Rail Enhancement National Development, however, it is clear that there would be essential infrastructure improvement required in respect of rail, road and the electricity grid directly associated with the National Development at Hunterston. North Ayrshire Council consider that infrastructure improvement or reinforcement

should be included in the description of the development as "elements covered by the designation" as an essential component for implementation.

The absence of the Action Plan for NPF2 means that how and when the key priorities will be delivered is not known. North Ayrshire Council would request that local authorities be given the opportunity to participate in the preparation of the Action Plan.

North Ayrshire Council requests that the statement contained in paragraph 170 relative to radio active waste which provides that "a further facility will be needed in the South of Scotland for radio active waste arising from processes elsewhere" be fully explained. In the absence of any explanation North Ayrshire Council will continue to reserve their position.

The inclusion of bypasses at Dalry and Kilwinning (para 222) is welcomed by North Ayrshire Council. North Ayrshire Council would wish both of these to be subject of continued design development and prioritised as future interventions recognised in the Strategic Transport Projects Review.

North Ayrshire Council would be happy to give oral evidence in support of the written views expressed above.

Ian Snodgrass

Chief Executive