

## **NATIONAL PLANNING FRAMEWORK 4 : CALL FOR IDEAS AND NATIONAL DEVELOPMENTS HUNTERSTON**

### **Introduction**

This representation concerns the site at Hunterston (see **Appendix 1**) and is submitted on behalf of our client, Clydeport Operations Ltd which is part of the Peel Ports Group in response to the invitation to submit a representation to the National Planning Framework 4 Call for Ideas and National Developments.

Hunterston is a 300 acre previously developed brownfield site and is a nationally significant industrial and multi-modal port located south of the settlement of Fairlie on the west coast of Scotland, 40 minutes from Glasgow. The site benefits from naturally deepwater and has excellent rail and utility connections. This nationally strategic site comprises the former coal terminal and the Marine Yard.

It is of significance to note that in Spring 2019, Peel Ports (Clydeport) published a Master Plan for Hunterston PARC area. This is a non – statutory document which was produced following a six week public consultation exercise and recent publication of a Stakeholder Report (enclosed as **Appendix 2**).

Following the consideration of the Master Plan stakeholder feedback an Illustrative Plan has been formulated consisting of several distinct areas (see **Appendix 1**) and include:

1. Marine Yard – construction and decommissioning
2. Industry – energy, recycling and circular economy
3. Port Activity – import/export of commodities and marine support services

The land at Hunterston has been a key investment location for major development in Scotland since the erection of the existing nuclear power station in 1964. In addition to the power station use at Hunterston it should also be noted that the Hunterston Ore Terminal was built between 1974 and 1979 primarily to supply the needs of British Steel and was directly linked by rail to the integrated Ravenscraig Steelworks in Motherwell. The existing marine construction yard was consented around the same time as the Hunterston Ore Terminal. It has in the past been used for the manufacturing of oil rigs and other marine related structures.

It is of importance to note the findings of the Infrastructure Commission’s Phase 1: Key Findings Report A Blueprint for Scotland (published in January 2020 and commissioned by the Scottish Government). On page 9 of the document they note the importance of “making the most of existing assets”. It is submitted that Hunterston is capable of enhancement and repurposing which would contribute to delivering on the aim of the commission to reuse existing assets which in turn will support the creation of a vibrant circular economy for Scotland.

At the outset it should be noted that the site at Hunterston is identified within the existing National Planning Framework 3 as an area of co-ordinated action where a flexible strategy to development is supported. National Planning Framework 3 notes the following :

***Hunterston has long been identified as a priority for industrial and employment use. It benefits from good transport connections, and close proximity to the cities network. North Ayrshire Council and its partners are exploring future options for the site. 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. Given its existing infrastructure, Hunterston will be an important landfall for strategic grid connections, including the link from Carradale in Argyll and the ISLES Project.*

Upfront and for the avoidance of doubt, while this representation supports the designation of the site at Hunterston as it is outlined in the currently adopted National Planning Framework 3 and seeks a continuation of this designation within National Planning Framework 4, it is also submitted that National Planning Framework 4 can go further regarding the Hunterston site and designate the site as a National Development. In the adopted North Ayrshire Local Development Plan 2 (2019) North Ayrshire Council also highlight their support for the designation of the site within National Planning Framework 4, stating *“We recognise the strategic national importance of Hunterston as an energy hub and deep water port. We strongly support the inclusion of Hunterston in the National Planning Framework 4.”* Reference to **Appendix 3** highlights the position of the adopted North Ayrshire Local Development Plan 2 in relation to the Hunterston site and the range of uses supported. In all regards support is offered for the content of the North Ayrshire Local Development Plan 2 as it relates to Hunterston and it is submitted that National Planning Framework 4 should allow for all of these uses.

In this regard, it is of significant concern to Clydeport Operations Ltd (Peel Ports Group) that despite Hunterston having been long acknowledged by the Scottish Government as being of national importance it was **not** identified as a National Development within the currently adopted National Planning Framework 3 and as such **this representation seeks the inclusion of Hunterston within the emerging National Planning Framework 4 as a National Development, which incorporates the following uses:**

- power generation
- bulk handling facilities for importing, processing and distributing all dry and bulk liquid cargoes
- free port / customs compound as a national hub for global trade and investment
- maritime construction and decommissioning yard
- related industrial processes (linked to the Circular Economy)
- renewable energy generation, testing, assembly, manufacture, servicing, maintenance, research and development, training
- other storage, processing and distribution uses and industrial activities
- Large scale energy production

The above noted uses are broadly represented on the illustrative masterplan (**Appendix 1**) which has been proposed by the Peel Ports Group and illustrates (at a high level) the uses envisaged on the site (marine, industry and port activity). In all regards it is submitted that the proposed uses are compatible with the site in question and maximises the potential which exists at Hunterston.

Furthermore this representation acknowledges the submission made by North Ayrshire Council to the emerging National Planning Framework (see **Appendix 4**) which recognises the clear strategic national importance of Hunterston as an energy hub and deep water port and its inclusion in the Ayrshire Growth Deal. This submission by North Ayrshire Council also seeks the designation of Hunterston as a National Development and is agreed with and supported.

**In all regards the National Planning Framework must set out a long term strategy for development in Scotland. Indeed both the current National Planning Framework 3 and the National Planning Framework 4 Call for Ideas / National Developments supporting information state such aims at the outset of both documents.**

**Given the above, it is of serious concern that Hunterston is not designated as a National Development within the existing National Planning Framework 3.**

**It is submitted that given the proposed long term nature of National Planning Framework 4 (25 – 30 years), Hunterston should be included as a National Development within National Planning Framework 4, in order to support the aims of a National Planning Framework, providing stability and consistency to developers and investors.**

**It is essential to the integrity of the emerging National Planning Framework 4 that Hunterston is designated as a National Development in National Planning Framework 4.**

With regard to the designation of a site as a National Development the background information on NPF4 and the guidance notes provided clearly state the following :

***“National Development Assessment Criteria***

*We will analyse all proposals for national development status in relation to the following criteria:*

- ***Climate Change*** : *The development will help to reduce emissions, contributing to Scotland’s target of net zero emissions by 2045, will be emissions neutral, or emissions negative.*
- ***People*** : *The development will support the health, wellbeing, sustainability, and quality of life of our current and future population.*
- ***Inclusive Growth*** : *The development will contribute to sustainable economic growth that helps to reduce poverty and inequality across Scotland.*
- ***Place*** : *The development will protect or enhance the quality of a place or improve biodiversity.”*

A number of questions are posed throughout the National Framework 4 – Call for Ideas supporting documentation which overlap with the National Development assessment criteria and as such this section of the representation comments on those questions which are relevant and applicable to the site at Hunterston.

**1. What development will we need to address climate change?**

It is submitted that National Planning Framework 4 should recognise the potential of Hunterston to assist in the delivery of a proactive response to climate change. Hunterston is at present an underutilised national asset which has the ease and ability to be a major port and industrial centre. It has the capacity to deliver renewables generation which can assist the Government in reaching their

target of net zero emissions by 2045. Hunterston is also able to be at the forefront of the development / use of carbon capture technology which will help to secure, low carbon energy supplies. Furthermore, there is capacity at Hunterston to deliver facilities which promote research, development, testing and training (including a renewables skills academy) which would assist in providing jobs within the area and supporting the local economy. It is submitted that Hunterston is capable of :

- Contributing to a reduction in emissions by 2050
- Achieving the aims of the Zero Waste Plan
- Assisting the Scottish Government in meeting their Renewable Energy Targets
- Delivering skills development, reducing unemployment and facilitating job creation
- Improving digital, transport, utilities or green infrastructure networks
- Adapting to or mitigating the effects of climate change

**Hunterston should be recognised as a National Development within the emerging National Planning Framework 4 as the site is adaptable, resilient and capable of meeting the National Development Assessment Criteria in relation to Climate Change. As outlined above, the development of Hunterston is capable of assisting in reaching the target of net zero emissions by 2045 and can support inclusive, sustainable economic growth as outlined by the uses outlined and illustrated on the masterplan (enclosed in Appendix 1).**

## **2. How can planning best support our quality of life, health and wellbeing in the future?**

Hunterston is located within a rural setting on the West Coast of Scotland, it is submitted that the development of the site for the uses outlined and illustrated within the masterplan (enclosed within **Appendix 1**) will help to encourage people to live in rural Scotland through stimulating economic growth and promoting job opportunities in the area, potentially providing 1700 jobs and £140 million investment in Scotland. At present, comparative to the East Coast, the West Coast of Scotland is experiencing a reduction in both population and investment. **Enhancements are required within the West of Scotland to encourage, stimulate and distribute economic growth and establish a better quality of place. It is submitted that the development of Hunterston for the uses outlined previously would unlock the potential of this brownfield site with unique grid connections and deep water port access and could be a catalyst for growth within the area.**

**The site at Hunterston should be recognised as a National Development within the emerging National Planning Framework 4 as it can help to empower this rural economy through the promotion of vibrant, creative, diverse and resilient developments which are capable of adapting to change. It is submitted that this will help to support improved quality of life, health and wellbeing in the area, and could improve the future of coastal communities for both existing and prospective residents (in line with the requirements of the National Development Assessment Criteria : People).**

## **3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?**

It is submitted that Hunterston has a key role to play in responding to the economic challenges Scotland is likely to face in the coming years (particularly in relation to the uncertainty that surrounds Brexit). The sites strategic location on the West Coast of Scotland and deep water port access presents a unique opportunity for Hunterston for example to be used as a free port / customs

compound– becoming an international gateway and strengthening Scotland’s links with the rest of the world. The site has the capacity accommodate bulk handling facilities for importing, processing and distributing all dry and bulk liquid cargoes and is capable of responding to the infrastructural requirements that may arise as a consequence of Brexit. Hunterston also has the potential to support over 1,700 jobs adding £140 million economic value to Scotland.

Throughout the duration of National Planning Framework 4 there will be a continued and heightened focus on responding to climate change and creating sustainable places to live. As outlined previously in response to Question 1, Hunterston has the capacity to deliver renewables generation which can assist the Government in reaching the target of net zero emissions by 2045. Furthermore, Hunterston is capable of the following :

- Stimulating and distributing economic growth
- Providing around 1700 jobs that will reduce the need for local people to travel long distances for employment (with the associated costs of reducing environmental, social and economic costs which in turn helps to reduce rural poverty)
- Becoming an international gateway and strengthening Scotland’s links with the rest of the world
- Retaining or even attracting younger people with high quality and long term jobs
- Halting or even reversing the trend in the declining population
- Creating the jobs that will in turn maintain demand for supply services (e.g. local shops) and public services (e.g. schools and healthcare)
- Building a more resilient economy by introducing a variety of industry sectors to the region
- Giving school leavers a ‘positive destination’ locally to aim for
- Stimulating education, training and skills development activities in the area
- Attracting complementary economic activities that will provide further opportunities for local people
- Actively managing environmental issues are part of the ongoing site management and development

**In line with the above, it is submitted that Hunterston as a major port and industrial centre with unique grid connections and deep water port access should be designated as a National Development within the emerging National Planning Framework 4 in order to provide stability and confidence to both investors and developers. Providing this stability and confidence helps to stimulate and distribute sustainable economic growth promoting development and investment within the economy which helps to reduce poverty and inequality (in line with National Development Assessment Criteria : Inclusive Growth).**

#### **4. What policies are needed to improve, protect and strengthen the special character of our places?**

In order to improve, protect and strengthen the unique character of Hunterston it is submitted that the site should be designated as a National Development. The increasing size of container ships combined with the capacity constraints at existing ports in the UK is giving rise to a need for accessible deep water transshipment facilities. There is a demonstrated capacity at Hunterston to facilitate deep water port capability for liquid and dry bulk commodities. It is favourably located in relation to world shipping routes and able to offer onward transshipment by sea, rail or road. This unique and strategic location should be protected and identified for the uses outlined in this

representation to ensure stability and consistency which promotes confidence and helps development projects to progress. As outlined in the Call for Ideas supporting information, our places continue to evolve and challenges can be expected. It is submitted that Hunterston with a designation as a National Development would be capable of addressing some of these key challenges. The redevelopment of brownfield land at Hunterston would promote employment and economic growth in a sustainable location, providing employment opportunities that will both retain and encourage economically active people to the area, reducing the impacts of an ageing population.

Hunterston PARC is located 30 miles of Glasgow on the West Coast of Scotland. It benefits from good road connections, is easily accessible from Glasgow Airport and has rail facilities available. The site also offers sea links to the Irish Sea and deep water links across the Atlantic, which will help with development opportunities for manufacturers seeking to connect with low cost sea, rail and road logistics and tap low cost onsite power.

**The designation of Hunterston as a National Development will help to unlock the potential of this currently underused site and will assist in the promotion, distribution and stimulation of economic growth within the neighbouring rural communities. It will also help to improve, protect and strengthen the unique and special character of Hunterston, in line with National Development Assessment Criteria in relation to Place.**

#### **5. What infrastructure do we need to build to realise our long term aspirations?**

It is submitted that Hunterston Terminal has a fundamental role in delivering the sustainable and innovative infrastructure that Scotland requires to facilitate future development. The site offers sea links to the Irish Sea, the new container terminal in Liverpool and deep water links across the Atlantic and has both road and rail links. Hunterston also has unique grid connections.

As stated previously within this representation, it is of importance to note the findings of the Infrastructure Commission's Phase 1: Key Findings Report A Blueprint for Scotland (published in January 2020 and commissioned by the Scottish Government ). On page 9 of the document they note the importance of "making the most of existing assets". It is submitted that Hunterston is capable of enhancement and repurposing which would contribute to delivering on the aim of the commission to reuse existing assets which in turn will support the creation of a vibrant circular economy for Scotland.

Hunterston is capable of delivering the wide range of uses outlined at the start of this submission and importantly has the potential to be a key international gateway through the creation of a free port/ customs compound on site. This will create high-skilled jobs at Hunterston and the surrounding area, investing in a rural economy and creating a hotbed for innovation. The introduction of a free port / customs compound as a national hub for global trade and investment will create a dynamic environment, capitalising on new ideas and will foster conditions that will attract new business, investors and innovations.

Hunterston should be recognised as a National Development within National Planning Framework 4 to emphasis and build on its strategic links in a post – Brexit world. It is essential that the Scottish Government seek to sustain these existing lifelines through the promotion of development on this strategic brownfield site.

**It is submitted that Hunterston should be designated as a National Development capable of facilitating and delivering the sustainable infrastructure required for Scotland to deliver on its long term aspirations.**

### **Conclusion**

This representation concerns the site at Hunterston and is submitted on behalf of our client, Clydeport Operations Ltd. in response to the National Planning Framework 4 – Call for Ideas and National Developments. This representation seeks the inclusion of the site at Hunterston as a National Development within the emerging National Planning Framework 4 which incorporates the following uses :

- power generation
- bulk handling facilities for importing, processing and distributing all dry and bulk liquid cargoes
- free port / customs compound as a national hub for global trade and investment
- maritime construction and decommissioning yard
- related industrial processes (linked to the Circular Economy)
- renewable energy generation testing, assembly, manufacture, servicing, maintenance, research and development, training
- other storage, processing and distribution uses and industrial activities
- Large scale energy production

In addition it is significant to note that the Hunterston site has for some considerable period of time been a site of national significance and it is considered of the utmost importance to note that major projects cannot be delivered in short time periods and as such the National Planning Framework should provide stability and long term confidence to investors through consistency of approach.

It is of significant concern to Clydeport Operations Ltd (Peel Ports Group) that Hunterston was **not** identified as a National Development within the currently adopted National Planning Framework 3. In all regards it is submitted that the emerging National Planning Framework 4 should adopt a long term commitment to national developments. The emerging National Planning Framework must provide confidence and stability to investors and developers to help encourage projects to be brought forward in today's difficult economic climate.

**In all regards it is submitted that the site at Hunterston should be designated as a National Development in the emerging National Planning Framework 4.**

- Appendix 1 : Plans showing site location and extent of illustrative masterplan site
- Appendix 2 : Hunterston PARC Master Plan : Stakeholder Report
- Appendix 3 : Extract from adopted North Ayrshire Local Development Plan 2 : Hunterston Strategic Development Area
- Appendix 4 : North Ayrshire Council Representation to NPF4 "Call for Ideas and National Developments"