



Friends of the Earth Scotland



Scottish Wildlife Trust



World Development Movement



Proposed coal fired power station at Hunterston

Opposition to the proposed 1852MW (gross output) coal fired power station at Hunterston in North Ayrshire is widespread at a local, national and international level, and includes many people in the communities that would be directly affected. A coalition of environment and development NGOs share this concern and have come together to campaign against the proposal. RSPB Scotland, WWF Scotland, Friends of the Earth Scotland, the Scottish Wildlife Trust, the World Development Movement Scotland, Oxfam, Christian Aid Scotland, the Church of Scotland and Planning Democracy are all in agreement that the proposal would result in unacceptable climate change impacts. Members of the coalition with an environment remit also oppose the proposal on the basis of unacceptable direct biodiversity impacts.

Over 20,000 objections have been submitted to the Scottish Government to date – the highest number ever received in response to a development proposal in Scotland – including a significant number from local people. North Ayrshire Council received 500 individual letters of objection during its consultation, including all the Community Councils consulted, and on 9 November the Council recommended refusal of the proposal. Local community group CONCH was formed to campaign against the proposal. A cross-party majority of MSPs in the Scottish Parliament's last session voted to support a motion opposing the proposal in a debate on 18 March 2010¹. The Scottish Government has set a welcome target for reducing greenhouse gas emissions by 42% by 2020, leading the world in showing that we are prepared to take action on climate change. However, the proposed plant at Hunterston is likely to lead to a significant increase in overall Scottish emissions.

Climate impacts

Unabated coal is the most carbon dioxide intensive of all mainstream fossil fuels, making it a leading contributor to greenhouse gas emissions. Climate change will have devastating impacts on ecosystems and species, and it is one of the most challenging issues facing vulnerable communities around the world. By 2015, an average of over 375 million people will be affected by climate-related disasters each year². Industrialised nations like Scotland, which bear the historical responsibility for climate change, have the greatest capacity to deliver an equitable global solution to the problem. The Scottish Parliament recognised this when it passed the world-leading Climate Change (Scotland) Act 2009. This demonstrated that Scotland was willing to take its fair share of the global effort required to prevent catastrophic climate change. The Hunterston proposal is incompatible with that intention.

Wildlife and local environmental impacts

Building a new power station at Hunterston would destroy a substantial part of the Portencross Coast Site of Special Scientific Interest (SSSI), which has nationally important eelgrass beds and the best remaining inter-tidal mud and sandflats left on the outer Clyde – important feeding grounds for a huge range of waterfowl and waders. Southannan Sands is one of the best areas for wildlife in the whole of the Clyde Estuary. The proposed development at the Hunterston site would extend across 104 hectares, equating to an area roughly the size of 148 football pitches. The buildings themselves would be

¹ <http://www.scottish.parliament.uk/business/officialReports/meetingsParliament/or-10/sor0318-02.htm#Col24826>

² http://www.oxfam.org.uk/resources/policy/climate_change/downloads/forecasting_disasters_2015.pdf

significant in size with the highest building approximately 115m tall and the air emission stack approximately 200m. Thermal and chemical pollution of the water around the site could have additional impacts on biodiversity – for example through proliferation of invasive non-native species. Coal fired power stations also produce large quantities of ash and the developer has assumed that a use will be found for all of the ash produced by the plant. However, if this is not the case, it seems likely that ash lagoons would be needed, resulting in further loss of important habitat. Impacts on health are uncertain.

CCS and Scotland's future energy supply

Scottish Government policy on CCS requires that new coal fired power stations will have to demonstrate CCS on 300MW (net) of capacity from the first day of operation. However, for a 1852MW proposal like Hunterston, this still means **over three quarters of capacity would be unabated**. The development would result in a new source of CO₂ emissions of between 42 Mt and over 300 Mt over its 40-year lifetime, depending on when and if full scale CCS is implemented. This would make a mockery of Scotland's emissions reduction targets. Retrofitting CCS technology on existing plants, such as Peterhead, would result in an immediate overall **reduction** in emissions and will help demonstrate the commercial viability of this new technology. We would urge the Scottish Government to prioritise CCS demonstration on existing plant for environmental, economic and innovation reasons, and in order to move Scotland towards a low-carbon energy supply rather than provide for a 'business as usual' approach by industry.

Research by Garrad Hassan³ has shown that Scotland's energy needs can be fully met using well-sited renewables, without building new coal fired power stations. The report looked at five scenarios for our future energy supply, and established that by 2030 renewable energy could meet between 60% and 143% of Scotland's projected annual electricity demand, depending on the level of investment in energy saving and new renewables. It shows that it is entirely plausible that no large-scale fossil fuel fired generating capacity would need to remain online by 2030. The report also concluded that new unabated fossil fuel capacity would severely compromise the likelihood of delivering our climate change targets.

A recent Judicial Review on the inclusion of Hunterston in National Planning Framework 2 was refused on the grounds that the petitioner did not have Title and Interest, although this is now being appealed. This demonstrates the incompatibility of the Scottish legal system as it stands with the Århus Convention on Access to Environmental Justice.

We remain concerned that Hunterston is still in the running for CCS funding by both UK DECC, and the European NER300 funding programme.

On 9 November, North Ayrshire Council unanimously agreed that the proposal should not go ahead. They have now formally objected and Scottish Ministers will now need to make a final decision after a Public Inquiry. We hope that the developers, Peel Energy, will now abandon the proposals, and save the time and money involved in a Public Inquiry being held.

This proposal at Hunterston would cause direct environmental harm and result in significant additional greenhouse gas emissions, and should not go ahead as currently proposed. We do not believe that new, largely unabated coal fired power stations are appropriate in light of our necessarily ambitious climate change targets.

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³ http://www.rspb.org.uk/Images/PowerofScotlandRenewed_tcm9-222405.pdf