



Proposed coal fired power station at Hunterston **Scotland does not need additional fossil fuel generating capacity**

RSPB Scotland is extremely worried about proposals for a new 1852MW (gross output) coal fired power station at Hunterston in North Ayrshire, and the permanent damage it will cause to the best remaining inter-tidal mudflats left on the outer Clyde. The additional carbon emissions from the power station would also seriously compromise Scotland's efforts to reduce greenhouse gas emissions and could damage efforts to make Scotland a world leader on climate change. Scotland's energy needs can be met through well-sited renewables, so building new fossil fuel power stations simply does not make sense. RSPB Scotland's serious concerns about this proposal were made clear to the developer at the outset. Ayrshire Power has now submitted the application to the Scottish Government and we will be lodging a formal objection in due course. **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, it is difficult to see how it can entertain proposals for new coal generating capacity if it hopes to achieve these targets.**

RSPB Scotland welcomed the decision in October of last year by Danish company DONG Energy to pull out of investing in a hugely polluting new coal plant on the Portencross Coast Site of Special Scientific Interest (SSSI) at Hunterston. Unfortunately, Peel Energy continued to develop the proposal, which was lodged with the Scottish Government on 2nd June 2010. This development would destroy around 30 hectares of the best remaining inter-tidal mudflats left on the outer Clyde, important feeding grounds for waterfowl. The proposed development at the Hunterston site would extend across 95 hectares, equating to an area roughly the size of 148 football pitches. The buildings themselves would be significant in size with the highest building approximately 115m tall and the air emission stack approximately 155m – just over 500ft. Until carbon capture technology is completely proven, **new coal power stations simply don't make sense technically, or environmentally.**

Notwithstanding our concerns with this proposal in principle, the plans put forward do not appear designed to minimise environmental harm on this important site. In particular, it is disappointing that the layout proposed would involve infilling and destroying valuable intertidal habitat. 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 is likely that ash lagoons would be needed, resulting in further loss of important habitat. After years of development, most of the areas like Southannan Sands, where this development is proposed, have been lost from the Clyde forever, and the few that remain are therefore a high priority for conservation. Inter-tidal habitats like this are vital, acting rather like service stations on a motorway for a huge range of ducks, geese and swans, which use them to top up on vital energy during their long migrations. Southannan Sands is one of the best areas for wildlife in the whole of the Clyde Estuary.

Research by Garrad Hassan¹ has shown that Scotland's energy needs can be fully met using well-sited renewables, and 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, especially coal-fired, would severely compromise the likelihood of delivering our climate change targets. Techniques such as Carbon Capture and Storage (CCS) abatement technology will be part of our transition to a low carbon economy, but we should concentrate on exploring these options at **existing power stations** so that there is a net reduction in emissions, rather than adding to emissions by building new plant.

The Scottish Government recently announced changes to their policy on requirements for CCS, so that new coal fired power stations would now 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. This would result in significant additional carbon emissions and would compromise our ability to meet the emissions reduction targets in the Climate Change (Scotland) Act 2009.

Retrofitting CCS technology on existing plants, such as Longannet power station in Fife, would result in an overall reduction in emissions and help demonstrate the commercial viability of this new technology. We urge the Scottish Government to ensure that CCS technology is used to move Scotland towards a low-carbon energy supply rather than provide for a 'business as usual' approach by industry.

The potential impacts of building this power station have given surrounding communities cause for concern, and a number of them have formed a local action group called CONCH (Communities Opposed to New Coal at Hunterston). An individual who lives close to the site is currently pursuing a Judicial Review of the designation of the Hunterston proposal as a National Development in the National Planning Framework 2. We share their concerns about the process.

We believe that Scotland's energy future should be environmentally sustainable and should support climate change objectives, with generation primarily from renewable energy combined with demand reduction to maximise energy conservation and efficiency. **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. RSPB Scotland does not believe that new, largely unabated coal fired power stations are appropriate in light of our necessarily ambitious climate change targets.**

For further information please contact:

<p>Aedán Smith, Head of Planning and Development, or Julia Harrison, Parliamentary Officer RSPB Scotland, 25 Ravelston Terrace, Edinburgh EH4 3TP Tel: 0131 311 6500 Fax: 0131 311 6569 Email: aedan.smith@rspb.org.uk or julia.harrison@rspb.org.uk <i>Registered Charity England and Wales Number 207076, Scotland Number SC037654 – July 2010</i> <i>RSPB Scotland is part of the Royal Society for the Protection of Birds, the UK-wide charity which speaks out for birds and wildlife, tackling the problems that threaten our environment. Nature is amazing - help us keep it that way.</i></p>
--

¹ http://www.rspb.org.uk/Images/PowerofScotlandRenewed_tcm9-222405.pdf