



Economy, Energy and Tourism Committee

Evidence session with Rt Hon Chris Huhne MP, Secretary of State for Energy and Climate Change, UK Government

RSPB Scotland is extremely worried about proposals for a hugely polluting new coal plant at Hunterston which would cause permanent damage to around 30 hectares of a SSSI. We submitted a formal objection to the application by Ayrshire Power which was lodged on 2nd June 2010 with the Scottish Government under Section 36 of the Electricity Act 1989. Our objection to the proposals for a new 1852MW (gross output) coal fired power station at Hunterston in North Ayrshire covers three main reasons – unacceptable direct biodiversity impacts, unacceptable climate change impacts and a lack of certainty of the full environmental impacts. Over 16,000 objections have been submitted to the Scottish Government to date – already one of the highest numbers ever received in response to a development proposal in Scotland. A majority of MSPs voted to support a motion opposing the proposal in a debate on 18 March 2010 in the Scottish Parliament¹.

Of direct relevance to the Committee's evidence session with Chris Huhne MP, Secretary of State for Energy and Climate Change, is the possibility that Ayrshire Power may apply for funding for the demonstration of Carbon Capture and Storage (CCS), which would be administered by the Department for Energy and Climate Change at Whitehall. It is imperative that there is no consideration of CCS demonstration funding for Hunterston by UK authorities until after a decision has been reached by Scottish Ministers on the current application for Energy Consent. It would be inappropriate to pre-empt Scottish Ministers' Energy Consent decision, and the thorough consideration of wider environmental impacts that this involves, not least when other projects at Longannet and Peterhead could demonstrate CCS without harming important wildlife sites and lead to real emissions reductions.

After years of development, many 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. 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. In addition, there will be uncertain environmental impacts from thermal and chemical pollution of the water around the site, which could have impacts on biodiversity – for example through proliferation of invasive non-native species.

The additional 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. Research by Garrad Hassan² has shown that Scotland's energy needs can be fully met using well-sited renewables, and without building new coal fired power stations. 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 could entertain proposals for additional coal generating capacity if it hopes to achieve these targets.

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

² http://www.rspb.org.uk/Images/PowerofScotlandRenewed_tcm9-222405.pdf

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 at Hunterston 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 in the Climate Change (Scotland) Act 2009. **Until carbon capture technology is completely proven, allowing the construction of new coal power stations simply does not make sense technically, or environmentally.** 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. Retrofitting CCS technology on existing plants such as Longannet power station in Fife would result in an overall reduction in emissions and will help demonstrate the commercial viability of this new technology.

The introduction of an appropriately strict Emissions Performance Standard (EPS) to limit emissions from coal and gas power stations could prevent the development of polluting new fossil fuel plant like Hunterston. There is a risk that the UK Government will set an EPS at a very generous level, which would allow developments to operate with only a minimum amount of CCS installed. This would not be enough to prevent an overall increase in greenhouse gas emissions. Although Scottish Ministers would still be able to refuse specific energy applications in Scotland, an EPS set at a high level by UK Ministers could undermine support for CCS as a means to reduce greenhouse gas emissions. The current Electricity Market Reform Consultation by DECC suggests that one option would be to set an EPS of 600g CO₂/kWh. This would allow plants like Hunterston to be built, result in massive unnecessary greenhouse gas emissions and undermine Scotland's efforts to decarbonise electricity generation by 2030.

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. We are urging 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 developers Ayrshire Power have made clear that the proposed new plant at Hunterston will not be feasible without funding for CCS demonstration. **Questions which the committee may like to ask the Secretary of State for Energy and Climate Change are:**

- **What criteria will be used to determine whether or not a project would be eligible for funding from the CCS demonstration competition?**
- **Can the Secretary of State confirm that projects would not be eligible to apply for CCS funding until such time as an Energy Consent under Section 36 of the Electricity Act 1989 had been granted?**
- **What assurances can the Secretary of State give that an Emissions Performance Standard will be introduced at a level that will result in real greenhouse gas emissions reductions and will not undermine the credibility of and support for CCS as means of reducing emissions?**

For further information please contact:

Aedán Smith, Head of Planning and Development, or **Kelsie Pettit**, Parliamentary Assistant

RSPB Scotland, 2 Lochside View, Edinburgh Park EH12 9DH Tel: 0131 317 4100

Email: aedan.smith@rspb.org.uk or kelsie.pettit@rspb.org.uk

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