

CONCH : Communities Opposed to New Coal at Hunterston

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Re Ayrshire Power (APL) application for coal power station at Hunterston under s36 Electricity Act.

CONCH, Communities Opposed to New Coal at Hunterston, was formed in July 2009. We are a voluntary, independent, community lead campaign, with no vested commercial interests and no party political affiliations.

CONCH gives a platform for people concerned about the proposed coal station at Hunterston to come together and speak with a stronger voice. CONCH's members primarily come from Largs, Fairlie and West Kilbride, but we have active members and supporters from across Scotland and beyond. In contrast to APL we are not backed by a billionaire tax-exile, do not have massive PR and marketing resources and are reliant entirely on volunteers from within the community to carry out our activities.

On 19.8.10, CONCH submitted a letter of objection to APL's plans for a multi-fuel power station at Hunterston. APL's addendum totally fails to address our concerns. Our opposition to the plans to build a dirty-coal power station remains undiminished.

We wish to take this opposition to elaborate upon the comments we made in our previous letter of objection and call again for the Scottish Government to reject outright APL's plans. We have not yet had the opportunity to study the responses from either SNH or SEPA to APL's addendum and it is our intention to make further representations in due course. The additional comments we wish to make at this stage are as follows:

1. IMPACT ON CLIMATE CHANGE

APL have failed to properly explain how they will either store or transport CO2. They have not demonstrated that it will be technically or economically feasible to capture carbon on 100% of emissions. Therefore their plans do not satisfy the requirements of Scottish Government as set out in "Thermal Power Stations in Scotland : Guidance and Information on Section 36 of Electricity Act (2010)".

APL's plans in relation to carbon capture and storage lack clarity, credibility and detail. It is unacceptable that APL can merely assert that they will provide this detail "at a later stage" (page 8-3), when carbon capture and storage is so integral to the coal-stations overall design and

environmental impact. They have for example failed to carryout a FEED (Front End Engineering and Design Study)¹ as we understand was recommended by SEPA.

RSPB Scotland, WWF Scotland and Friends of the Earth Scotland have commissioned consultants Element Energy to undertake an independent review of the climate implications of this proposal. A summary of this research will be published shortly², however the main conclusions are summarised below:

- Emissions from year one of the proposed power station would be equivalent to adding 63% to Scotland's annual power sector emissions.
- By 2050 emissions from Hunterston could be equivalent to 57% of all the emissions allowed, from all sectors, under the Climate Change (Scotland) Act 2009.

CONCH are also deeply concerned about the lack of detail provided in connection with APL's requirement to fully retrofit the power station with CCS, which is again contrary to Scottish Government Thermal Energy Guidance. For example. the environmental impact modeling contained within their addendum refers to capturing carbon only on 400MW (gross) output, not the full 1852MW output. The Thermal Energy Guidance includes a clear expectation that a full retrofit of CCS will occur (see below), but APL have failed to explain how they will achieve this:

“Applications for construction of new coal based stations or existing power-stations upgrading to supercritical technology, will still need to indicate their suitability in terms of carbon capture readiness as the initial requirements for CCS refer to only part of the station capacity. Over time, it is envisaged that such stations covered by this section of the guidance will be expected to fit CCS to their full capacity so an indication of CCR for the station as a whole will be required.”

In addition to breaching Thermal Energy Guidance, unless carbon capture technology can be proved to work on 100% of emissions from the outset it will make it impossible for Scotland to meet its targets for reducing CO2 emissions as set out under the Climate Change (Scotland) Act 2009.

2. IMPACT ON PUBLIC HEALTH

The addendum fails to allay our concerns about the coal station's negative impacts on public health. At page 3.34 APL admit that “revised human health impact assessment shows that the risks have increased...” and page 3-17 of the addendum, shows that levels of sulphur dioxide pollution to be of particular concern.

The coal station will have an adverse impact on public health, due to its toxic waste products, dust and sulphur pollution as well as noise and air pollution. Coal combustion releases mercury, particulate matter, nitrogen oxides, sulfur dioxide, and dozens of other substances known to be hazardous to human health. Coal is not clean and never will be.

APL's analysis of the health risks associated with air pollution remain flawed as they do not adequately take account of the particular landscape of the Hunterston area, or the high variables in wind and other meteorological factors that will impact on the distribution of pollutants. Nor do they adequately take account of the cumulative and combined affect of different pollutants acting together. Put simply it is not just the individual levels of pollutants that comes out of the chimney,

¹ See p 8-3

² Element Energy (2011) CO2 impact of Proposed Hunterston Coal/CCS Plant. Revised Final report for FoE Scotland, WWF Scotland and RSPB Scotland.

that matters; but what happens over a longer period of time, and the health risks of repeated exposure to a wide range of different pollutants.

We are also unconvinced by the “logic” used at pages 3.32-3.34 for them to find the results of ADMS modeling more credible than AEROMOD. This appears to be a case of choosing to rely on the modeling which gives a lower reading, and then finding arguments to support it. The companies who have collated environmental data for APL have vested commercial interests: their analysis is far from objective or independent.

We refer you to independent research evidence on the health impacts of coal power stations collated by CONCH which can be viewed at <http://www.conchcampaign.org/health.html>. Recent studies include the Physicians for Social Responsibility report “Coal’s Assault on Human Health,” looking at the cumulative harm inflicted by pollutants on the respiratory system, the cardiovascular system, and the nervous system; plus Hunter Valley Research Foundation’s report from Australia which revealed an increased mortality, decreased life expectancy, increased rates of lung, skin and colorectal cancer and increased rates of death from breast, cervical and prostate cancer.

A full, objective and independent assessment of the potential adverse health impacts of APL’s plans is required.

3. IMPACT ON TOURISM

The visual impact of the plant combined with massive levels of noise and dust pollution will have a devastating impact on a local economy which is heavily reliant on tourism. Only 160 permanent jobs will be created, but many more jobs will be lost. The plans will deter day visitors, sailors, walkers, cyclists and holiday makers upon whom the economies of Largs, Millport, Fairlie and West Kilbride and surrounding areas are all reliant. Computer Images used by APL throughout the addendum to illustrate the potential visual impacts of the coal station are misleading. The coal station will destroy an area of scenic beauty for generations to come. Ayrshire Power’s claim that increasing the chimney stack from 155m to 200m will not have any major adverse impact on the local tourist economy is simply risible.

4. IMPACT ON WILDLIFE HABITATS/LOCAL ECOLOGY

The proposed coal-fired power station would lead to the certain destruction of a significant part of the Portencross Coast Site of Special Scientific Interest (SSSI). It would destroy around 30 hectares of a nationally important wildlife site, the intertidal mudflats at Southannan Sands, which support many wintering and wading birds and are one of the few remaining habitats of this kind left on the outer Clyde. The plans will also have an adverse impact on the Special Protection area of Renfrewshire Heights, which is of national and international importance for its populations of breeding hen harriers. The impact on wildlife/ecology of increasing water temperature (through thermal discharge) by up to 10°C will also be devastating. APL have admitted at p 9-4 that “the results of modeling suggest thermal effluent will elevate the seawater temperature to a level where mortality or a failure to reproduce could occur”. We share the concerns raised by RSPB in their representations made on 21 September, which contains more detailed analysis of habitat and biodiversity impacts.

5. MAJOR PUBLIC SAFETY CONCERNS

The proposed development is to be built adjacent to a nuclear power station, on an area of flood risk, which due to its coastal location is often exposed to extremely high winds. Inadequate consideration has been given to the major health and safety risks posed by these factors. There are also major public health risks from spontaneous combustion of the coal heaps, and from using unproven technologies (large-scale compressed carbon) right next door to a nuclear power station. Inadequate consideration has also been given to health risks associated with large quantities of ammonia being transported on and off site. The addendum fails to adequately address these risks.

6. HUMAN RIGHTS CONCERNS

Ayrshire Power's plans will increase the amount of coal (4.6M tonnes pa) imported from countries where miners and communities suffer from human rights abuses. We refer you to independent research, collated by CONCH, exposing the human rights abuses experienced by coal mining communities across the globe available to view at <http://www.conchcampaign.org/humanrights.html>. These concerns continue to be ignored by APL, who are a company who are more interested in profit, rather than the impacts their business will have on mining communities. CONCH urge the Scottish Government to have an energy policy that is based on ethical values and that respects human rights and we refer you to comments made in our earlier submission for more detail.

7. LOCAL INFRASTRUCTURE CANNOT COPE

Ayrshire Power's claims that no upgrades will be required for either road or rail are not plausible. The local infrastructure cannot cope with a plant of this size being built, in particular for the need to transport 860,000 tonnes of ash/gypsum off site each year.

8. NO NEW COAL STATION IS REQUIRED

Ayrshire Power have failed to prove the need for a new fossil fuel power station. There is strong evidence to show that there is no impending energy gap in Scotland. We refer you to the Draft Electricity Generation Policy Statement, which was published in November 2010. This statement (page 6) makes clear that: "NPF2 does not set policy in stone and energy policy has moved rapidly in the EU, UK and Scotland during the past year, in line with evolving technologies". More specifically, page 28 highlights that, "as a result of renewable generation ambitions and interconnection upgrades, there is no current need for an increase in overall thermal capacity". Priority should be given to greener and more sustainable forms of energy, rather than dirty coal.

For the reasons contained within this submission as well as our earlier representations, we are calling on the Scottish Government reject outright this planning application.

Yours sincerely

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Co-chair CONCH