



The Church of Scotland

Church and Society Council

121 George Street
Edinburgh, EH2 4YN

Tel: 0131 225 5722
Fax: 0131 240 2239

Email: churchandsociety@cofscotland.org.uk

Scottish Charity Number: SCO11353

26 September 2011

Lesley McNeil
The Scottish Government
Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow G2 8LU

Dear Ms McNeil,

**APPLICATION UNDER SECTION 36 OF THE ELECTRICITY ACT 1989
ERECTION OF A MULTI-FUEL POWER STATION AT SITE TO SOUTH WEST OF
HUNTERSTON COAL YARD, FAIRLIE, LARGS AYRSHIRE**

On 17 August 2010 the Church of Scotland submitted a letter of objection to this proposal. A copy of that letter is attached below. Now the applicant has submitted an addendum to the proposal, I am writing to reassert our objection.

We are not convinced that the application with addendum is a significant improvement on the original. Rather we believe that it will continue to result in an unacceptable increase in carbon dioxide emissions. This would be contrary to the targets for the emission of greenhouse gases in Scotland resulting from the Climate Change (Scotland) Act 2009.

In addition to the arguments set out in our 2010 submission it is worth restating the established view of the Church of Scotland agreed at the General Assembly of 2007. In 2007 the General assembly considered a report from the Church and Society Council on the role of different types of energy generation in Scotland. The report argued that :

Renewable energy should be developed as quickly as possible and play the largest role that it practically can as soon as it can.

We do not favour building base load generating plant, using either fossil fuels with carbon capture and storage or nuclear energy.

It is interesting to note that the Scottish Government Draft Electricity Generation Policy Statement in November 2010 stated *there is no current need for an increase in overall thermal capacity.*

As the growth of renewable energy sources continues and the need for new thermal capacity declines so the case for a new power station at Hunterston weakens. For these reasons and for the reasons set out last year, the Church of Scotland continues to oppose the application.

Yours sincerely

Rev Ian Galloway
Convener, Church and Society Council

17 August 2010

Scottish Government Energy Consents Unit
4th floor Atlantic Quay
150 Broomielaw
Glasgow G2 8LU

Dear Sir

Application by Ayrshire Power to Scottish Government to Construct a Coal Fired Power Station at Hunterston, North Ayrshire

On behalf of the Church of Scotland I wish to formally object to the proposed coal fired power station at Hunterston and ask that the Scottish Government reject outright the planning application from Ayrshire Power.

Background to the Objection

Ayrshire Power Ltd submitted an application for a 1852 MW coal and biomass fuelled Hunterston Power Station to Scottish Ministers on 2 June 2010. The Church of Scotland has concerns about the proposal because of the likely increase in carbon dioxide emissions that will result. Any such increase in emissions will make the national targets of Scotland's Climate Change Act difficult if not impossible to achieve.

We are also aware that local congregations have concerns about the implications of the proposed development and its impact on the local environment. We share those concerns and support the objections of local communities but in our letter of objection concentrate on the national implications.

Why the Church of Scotland is Concerned about the Application.

The report of the Church and Society Council to the General Assembly 2009 identified climate change as one of the most important challenges facing people around the world.

“The Church of Scotland is concerned that climate change poses a serious and immediate threat to people everywhere, particularly to the poor of the earth; and that climate change represents a failure in our stewardship of God's creation. We accept the need to reduce the emissions of greenhouse gases urgently to avoid dangerous and irreversible climate change; and to promote a more equitable and sustainable use of energy.”

To respond to the challenge of climate change the Church of Scotland is active on a number of fronts

- The Church is working to with congregations to help them reduce their carbon footprint, both in their church buildings and in their own lives.
- It supports Eco-Congregation Scotland, a Scottish charity with over 250 congregations committed to taking action to care for the earth.
- It is a leading member of the Stop Climate Chaos Scotland (SCCS) coalition. The coalition contains around 60 organisations in Scotland that are campaigning on climate change. Together SCCS represents over two million people in Scotland.

Climate Change (Scotland) Act 2009

The Church strongly supported the work of the Scottish Parliament and Scottish Government in developing this legislation. The Act sets very ambitious targets to reduce Scotland's greenhouse gas emissions by 42% in 2020 and 80% in 2050. Meeting these targets will not be easy and will require action in all sectors of the economy to reduce the use of carbon fuels. This will be particularly true of electricity generation.

The Church of Scotland is working with the Scottish Government to achieve the targets set out in the Act. In particular we are keen to ensure that the statutory Public Engagement Strategy required by the Climate Change Act is effective in helping individuals and communities across Scotland understand the importance of climate change and in giving them the confidence to respond to it effectively.

However if individuals and communities are going to respond to climate change they must also have confidence that the Scottish Government and other major players are doing their part. The energy sector is one of the biggest sources of greenhouse gas emissions in Scotland with two existing large coal fired power stations at Longannet and Cockerzie capable of contributing up to 15 million tons of CO₂ each year, approximately 30% of Scotland's total CO₂ emissions. Action to reduce these emissions would be one of the quickest and most effective ways of reducing Scotland's carbon footprint.

Carbon Capture and Storage (CCS)

Research and development of this new technology is underway both in Scotland and elsewhere with demonstration projects across Europe supported by the European Energy Programme for Recovery (EPR). As the programme says the technology represents a *potentially* powerful instrument for fighting climate change:

The groundbreaking CCS technology represents a potentially powerful instrument for fighting climate change by minimising CO₂ emissions from fossil fuel power plants and heavy industry (e.g. cement, steel and chemicals). The International Energy Agency (IEA) considers CCS technology as essential to ensure global temperature increases remain under 2 degrees Celsius. While the different components of CCS technology are proven, the full CCS chain has not yet been demonstrated on a commercial scale. The next milestone is to prove its technical and economic viability on large scale power plants. In this respect, the EPR support will be decisive in facilitating wider demonstration of CCS technologies in Europe.¹

CCS has not yet been made to work at anything like the scale of a large power plant such as that proposed at Hunterston so it is difficult to see how it could be installed and made operational in any effective way from day one. Without this clean technology in place the power station would remain a traditional 'dirty' coal fired power station.

National Planning Framework 2 (NPF2)

The NPF2 designates as a national development a 'clean coal fired power station' at Hunterston. Further, it identifies 'carbon impact, including provision for carbon capture and storage' as a matter to address when consent is sought. As indicated above the proposed development cannot be described as

¹ http://ec.europa.eu/energy/publications/doc/2010_eepr_brochure_co2_en.pdf

‘clean’ without CCS being fitted at the outset, which will not happen under the proposal submitted. The proposals set out in the planning application will lead to a substantial increase in Scotland’s carbon emissions. Therefore the application is not consistent with the requirements of NPF2.²

Scottish Parliament Debate

These concerns were aired in a debate in the Scottish Parliament on 18 March 2010. Patrick Harvie MSP called on Parliament to oppose new unabated coal power capacity

*“... and therefore calls on the Scottish Government to reject plans to build a new coal-fired power station at Hunterston, given that large-scale carbon capture and storage at existing coal or gas plants has never been successfully demonstrated”.*³

The amendment was carried with a substantial majority (66 in favour; 26 opposed with 10 abstentions). While this debate is not part of the planning process and does not formally mean that the proposed development will be rejected it does clearly represent the will of the Scottish Parliament. Members of the Scottish Parliament have considered the idea of having a large new coal fired power station at Hunterston and have rejected it.

Scotland’s Symbolic Leadership

With its groundbreaking Climate Change Act Scotland has demonstrated international leadership. The Stop Climate Change Scotland coalition has brought together a disparate range of groups in support of the legislation and its implementation; one of the largest such coalitions ever seen in Scotland. The Church is proud to be associated with the coalition and with its successful campaign to strengthen the Climate Change Act. This places Scotland in a leading position internationally and provides moral leadership for change in Scotland which the proposed development at Hunterston puts at risk. The Scottish Government has already been accused of ‘greenwash’ because of its stance on coal and the proposed power station.⁴ For communities including many church congregations across Scotland who are trying to change their lives to reduce their carbon footprint this is a demoralising signal. Eco-congregations have taken on a range of challenges and some have been extraordinarily successful in reducing their carbon footprint. The Church is encouraging others to do the same, yet this work will become much more difficult if the commitment of the Scottish Government is believed to be hollow. We recognise that the Scottish Government has inspired and supported action to help communities across Scotland respond to climate change but this proposed development could seriously undermine that action.

The carbon emissions from the proposed power station could wipe out all the savings achieved by community groups, eco-congregations and others across Scotland and jeopardise future attempts to inspire public engagement in climate change.

Conclusion

The Church of Scotland is opposed to the proposed development set out in the planning application on the grounds that:

² Scottish Government *National Planning Framework for Scotland 2*, 2009, pp120-121

³ Scottish Parliament *Official Report* 18 March 2010

⁴ Fred Pearce in the Guardian <http://www.guardian.co.uk/environment/2009/feb/05/greenwash-coal-fred-pearce/print>

- any new coal fired power station without a proven and effective system of carbon capture and storage fitted at the outset will undermine the Scottish Government's plans to reduce Scotland's carbon footprint;
- the technology is not yet sufficiently well developed or proven to deliver CCS in a plant of this size; and
- the power station would not only be a huge setback for the Scottish Government but would undermine the role of all those individuals and communities across Scotland who are taking action to reduce their carbon footprints.

The proposed development fails to meet the designation of a 'clean coal fired power station' set out in NPF2 and I therefore ask that the Scottish Government reject this application.

Yours sincerely

Rev Ian Galloway
Convener, Church and Society Council