



PO Box 90. Llandrindod Wells. Powys LD1 9BP [info@wana.wales](mailto:info@wana.wales)  
[www.wana.wales](http://www.wana.wales)

## **OBJECTION to Application by Horizon Nuclear Power Ltd for an Order Granting Development Consent for the Wylfa Newydd Nuclear Power Station.**

Whilst we recognise current Planning Legislation does not allow the Inspectorate to examine the merits of Government energy policy we believe the policy is out-of-date, fails to address climate change and is not appropriate for Wales as we have more than enough renewable energy sources of our own. We contend the proposals put forward by Horizon for Wylfa Newydd are totally inappropriate and should not be approved for the 10 reasons below .

### **1. AT VARIANCE WITH WELSH LEGISLATION**

The flagship legislation the “Wellbeing of Future Generations Act (Wales) 2015” offers a huge opportunity to make long-lasting, positive changes for future generations around clean energy. Nuclear energy is not renewable, green or clean in fact it creates a legacy of radioactive waste at every stage of its cycle (from uranium mining, milling, as fuel , transport reprocessing and decommissioning) Problems that future generations will have to address long after this outdated technology has been abandoned.

In 2018 when supporting the development of a Swansea Tidal Lagoon the Future Generations Commissioner for Wales said “ Nuclear energy is not renewable and Earth’s uranium would eventually deplete meaning that we are effectively depriving our future generations from using that in new and maybe less harmful ways in the future.”  
<https://www.walesonline.co.uk/news/politics/seven-ways-swansea-lagoon-would-14788765>

### **2. NOT NEEDED IN WALES**

It is becoming increasingly apparent that renewables will offer the lowest cost of electricity over their lifetime of all generating options. The Institute of Welsh Affairs Report “ The Economic Costs and Benefits of Renewable Energy Transition in Wales “ shows that the development of an energy system that can enable Wales to become 100% self-sufficient in renewable electricity by 2035, requires around £25bn of investment in renewable electricity generation, and £5bn in domestic energy efficiency interventions. This analysis also shows that some 40% of renewable electricity spending could potentially be captured by Wales, along with 70% of domestic energy efficiency spending. In addition these investments could support some 20,150 jobs annually across Wales during the investment period.  
<https://www.iwa.wales/click/2018/11/the-time-is-now-tick-tock-its-ticking-away/>

### **3. THE TAX-PAYER SUFFERS**

Wylfa Newydd is reliant on investments from outside the UK plus huge subsidies from UK Government making consumers pay much more for their energy than they need to. It has been shown that cancelling Hinkley C and switching to renewables would save Britain at least £30-40 billion in energy bills. Onshore windfarms would cost £31.2 billion less than

Hinkley, and solar photovoltaic power £39.9 billion less over 35 years to build and run.  
<http://www.if.org.uk/research-posts/7925/>

Wales currently generates no energy from nuclear and the most optimistic scenario for new nuclear generation at Wylfa Newydd is 2027 ; A recent study has shown that delays can run into years or even decades and can lead to costs of nearly 20 % higher than expected .  
<https://www.sciencedaily.com/releases/2018/05/180529132032.htm>

#### **4. NUCLEAR WASTE PROBLEMS**

The 'high burn-up fuel' which Wylfa Newydd is expected to use will be much more radioactive than the spent fuel produced by existing reactors  
[https://www.nuclearconsult.com/Too\\_Hot\\_to\\_Handle.pdf](https://www.nuclearconsult.com/Too_Hot_to_Handle.pdf) Unlike spent fuel from Wylfa A , which was taken to Sellafield for reprocessing, spent fuel from new reactors such as Wylfa Newydd are likely to be treated differently and kept on site until disposed of.

To date no site has been found for the proposed Geological Disposal Facility (GDF), even when it materialises it is not expected to be ready to receive waste until at least 2040. Waste from new reactors like Wylfa Newydd is not scheduled to be placed in the GDF until after all existing waste has been located – a job scheduled to take around 90 years. Consequently spent fuel from the proposed new reactors could remain on site for at least 120 years.  
<https://www.niauk.org/industry-issues/waste-management/>

#### **5. NEGATIVE IMPACT ON LOCAL EMPLOYMENT**

Going ahead with Wylfa B is likely to detract attention from the far greater job-creating potential of other industries, such as an energy efficiency programme, and the renewables industry. It may also dissuade companies from setting up in Anglesey, have a detrimental effect on existing companies that cannot compete with high construction wages and those based around tourism and agriculture, which rely on an area's reputation for a clean environment to attract business.

Past experience suggests that a large construction project in a remote area like Anglesey could have a detrimental effect on employment long- term. A Report published in September 1976 by the Gwynedd Principal County Planning Officer called "*The Impact of a Power Station on Gwynedd*" concluded that

*"...The completion of the large scale construction schemes in the County have often been followed by a rapid rise in unemployment ... The situation is much worse in a period of economic depression since it is difficult to create new jobs for local workers and migrant workers tend to stay in the area, adding to the number of unemployed. Thus, while it is difficult to prove conclusively, the evidence suggests that the long term effect of the major construction schemes in Gwynedd has been to help prevent the growth of employment in more stable industries as a result of the impact of large scale construction projects on low wage levels and labour supply".*

#### **6. UNDERMINES THE CULTURE + PLACES BURDENS ON LOCAL SERVICES**

Horizon estimates Wylfa Newydd will take about nine years to build with between 8,000 and 11,000 workers, most of whom are likely to be from outside the area so are not likely to be Welsh speakers. In-migration of non-Welsh speaking construction workers into local communities could have an adverse effect on the language and culture by reducing the proportion of Welsh speakers.

Gwynedd Council has expressed concerns that significant issues related to accommodation, transport, skills and employment, the language and public services have not been adequately addressed by the Applicants. In addition Betsi Cadwaladr Health Board's Strategy Director, said services could be squeezed. He said, with the addition of workers

and their families, the population of Anglesey could rise by about 12% and the impact may fall on a small number of GP practices and impact on hospital and community services

[https://www.bbc.co.uk/news/uk-wales-](https://www.bbc.co.uk/news/uk-wales-46289154?SThisFB&fbclid=IwAR1MdKaZLzNOaEm_Fx7wArm87IUnGabFcYHwCbqfMgQAnBRoeqK3cUiUB2g)

[46289154?SThisFB&fbclid=IwAR1MdKaZLzNOaEm\\_Fx7wArm87IUnGabFcYHwCbqfMgQAnBRoeqK3cUiUB2g](https://www.bbc.co.uk/news/uk-wales-46289154?SThisFB&fbclid=IwAR1MdKaZLzNOaEm_Fx7wArm87IUnGabFcYHwCbqfMgQAnBRoeqK3cUiUB2g)

## **7 WILL DESTROY IMPORTANT HABITATS**

There are six nationally and internationally designated sites within 2km of the Wylfa Newydd Development Area, the closest being Cemlyn Bay SSSI and SAC; Tre'r Gof SSSI, Cae Gwyn SSSI, and Morwenoliaid Ynys Môn /Anglesey Terns SPA. Tre'r Gof SSSI is particularly important as it is situated within the Wylfa Newydd Development Area. Other designated sites of interest within 2km include nine local Wildlife Sites and further afield Ramsar, SPA and SAC sites.

Cemlyn nature reserve is home to thousands of sandwich terns, which account for about a fifth of the birds' UK population and is the biggest on the country's west coast, the terns are protected under the EU birds and habitats directive. In addition there are three nationally or internationally designated marine-based nature conservation sites either within the Wylfa Newydd Development Area itself or within 100m of the site.

## **8. SAFETY + EVACUATION**

If there were an accident at Wylfa Newydd which required the evacuation of an area similar to the area evacuated around Fukushima, experience suggests this would cause complete chaos because of the limited capacity of routes to the mainland.

## **9. NO ANSWER TO CLIMATE CHANGE –**

The latest news says we have 12 years to act on climate change before it becomes seriously problematic. Two of the biggest solutions are being far more energy efficient, and moving from coal, oil and gas to 100% renewable energy asap.

Nuclear power is not a solution to climate change as it is not renewable or low carbon, cannot deliver within the timescales needed, is an extremely expensive way of guaranteeing baseload and distracts from real low carbon alternatives.

The Zero Carbon Britain Project <http://www.zerocarbonbritain.org/en/> offers hard data and the confidence required for visualising a future where we have risen to the demands of climate science. It shows we can provide a reliable energy supply for the UK with 100% renewable energy sources and flexible carbon neutral back up - without fossil fuels, nuclear power, or gambling on the promise of future technology.

## **10. OUTDATED TECHNOLOGY ?**

Britain should put the brakes on developing new nuclear facilities and boost investment in wind farms and solar power, according to the government's independent advisers. Only one more nuclear plant should get the go-ahead between now and 2025, as renewables offer a less risky and potentially cheaper alternative, the National Infrastructure Commission says. This should include a revival of support for onshore wind and should mean that half of electricity is generated by renewables by 2030, up from about 30 % today, [The Times July 10<sup>th</sup> 2018](#)

There has been a quiet revolution taking place at the grass roots which has turned the tide of evidence towards renewables for delivering the lion's share of the energy mix. It forces what has been a relatively protected industry sector to assess whether it can compete in the real world. <https://theecologist.org/2018/jul/18/white-nuclear-elephants-move-endangered-list>