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Good Evening

This is the first in a series of 8 e-mails for the Wylfa Newydd DCO Examination Deadline 3 deliverables.

The list below provides a complete list of all documents attached to this e-mail and we will also be delivering 2x USB pen drives containing all of our Deadline 3 submission to your offices at 10:00 tomorrow (Tuesday 18th December).

Our covering letter in support of the submissions is also attached.

0 Deadline 3 Cover Letter.pdf
01 1.3 Guide to the Application.pdf
02 1.3 Guide to the Application (Rev 4.0) Welsh Language.pdf
03 Horizon's Response to IACC's Local Impact Report.pdf
04 Horizons response to Interested Parties responses to the ExA First Round Written Questions.pdf
05 Horizon's Response to Written Representation - Arthur Wyn Owen .pdf
06 Horizon's Response to Written Representation - Betsi Cadwaladr University Health Board .pdf
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14 Horizon's Response to Written Representation - Michael Cominetti .pdf
15 Horizon's Response to Written Representation - Nuclear Free Local Authorities .pdf

Kind Regards

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Wylfa Newydd Project

Horizon's Response to Written Representation – Greenpeace

PINS Reference Number: EN010007

18 December 2018

Revision 1.0

Examination Deadline 3

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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1 Horizon's Response to Greenpeace's Written Representation

1.1 Introduction

- 1.1.1 This report provides Horizon's response to the Written Representation submitted by Greenpeace at Deadline 2 (4 December 2018). For ease, cross-references are provided (where appropriate and feasible) and the response generally follows the structure and sequence of the written representation received. Horizon has endeavoured to respond to the key matters raised in this written representation. Where Horizon has not responded to a particular point or issue raised by an Interested Party, this should not necessarily be taken as agreement with that point.

1.2 Written Representation

Government policy on the need for new nuclear power

- 1.2.1 The principle of the need for new nuclear power stations, and that this need is urgent, is firmly established in the Overarching National Policy Statement (NPS) for Energy (EN-1) and NPS for Nuclear Power Generation (EN-6) and is reaffirmed by the Ministerial Statement on Energy Infrastructure (December 2017) (the 'Ministerial Statement') and the Government Response: Consultation on the Siting Criteria and Process for a New National Policy Statement for Nuclear Power with Single Reactor Capacity Over 1 Gigawatt Beyond 2025 (July 2018) (Document 29) (the "Government Response to the Consultation on Siting and Process").
- 1.2.2 EN-1 sets out that the UK Government believes there is an urgent need for new electricity nationally significant infrastructure projects (NSIPs) to meet energy security and carbon reduction objectives, the need to replace closing electricity generating capacity, to support an increased supply from renewables and future increases in electricity demand.
- 1.2.3 EN-6, stresses the urgency of bringing forward new nuclear power projects as part of the drive to decarbonise the UK's electricity supply and to increase energy security. EN-6 included the Wylfa site as a potentially suitable site for the deployment of new nuclear before the end of 2025, subject to certain matters that require further consideration through the DCO application. The UK Government (in including the Wylfa site in EN-6) concluded that none of these factors were sufficient to prevent the site from being considered potentially suitable. In EN-6 specifically states that there are no other known alternatives to the listed sites that are potentially suitable for the deployment of new nuclear power stations in England and Wales before the end of 2025.
- 1.2.4 The UK Government's continued support for new nuclear power generation is set out in the Ministerial Statement which states that "new nuclear power stations have an important role to play", "nuclear is vital to our energy mix", and that the UK Government "believes that it is important that there is a strong pipeline of new nuclear power to contribute to the UK's future energy system". The UK Government also reaffirmed its commitment to nuclear power in the Government Response: Consultation on Siting and Process which provides

that the "Government continues to believe that nuclear has an important role to play in the UK's energy future as we transition to the low-carbon economy".

- 1.2.5 The UK Government is currently bringing forward a new NPS applicable to nuclear power plants deployed after 2025 and capable of deployment by the end of 2035 and has previously consulted on the process and criteria for this. The Government Response to the Consultation on Siting and Process published in July 2018 states that the UK Government proposes to carry forward the sites listed in EN-6 (including Wylfa) into the new NPS, subject to them meeting the updated siting criteria and updates of their environmental assessments. Horizon has submitted a nomination for the Wylfa site, and the UK Government is assessing the nomination against the criteria and undertaking an Appraisal of Sustainability. The UK Government estimates that it will lay the final NPS before Parliament in spring 2020.

Applicability of NPS EN-1 and NPS EN-6

- 1.2.6 Although EN-6 applies to projects that will deploy prior to 2025, the Ministerial Statement issued by the Department for Business, Energy and Industrial Strategy in December 2017 confirms that "the Government is confident that both EN-1 and EN-6...will continue to be important and relevant for projects that deploy after 2025... In respect of matters where there is no material change in circumstances it is likely that significant weight should be given to the policy in EN-1 and EN-6". The UK Government also reaffirmed its commitment to nuclear power in the Government Response to the Consultation on Siting and Process which provides that the "Government continues to believe that nuclear has an important role to play in the UK's energy future as we transition to the low-carbon economy".
- 1.2.7 The Ministerial Statement provides that, until a post-2025 nuclear NPS is adopted (expected to be in spring 2020), nuclear power station projects applying for development consent and due for deployment beyond 2025 should be considered under section 105 of the Planning Act 2008.
- 1.2.8 The Ministerial Statement is clear that EN-1 and EN-6 remain important and relevant matters which would carry significant weight in determining the application under section 105 of the Planning Act 2008. The Ministerial Statement states:

"Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025, including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under section 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters where there is no relevant change of circumstances it is likely that significant weight would be given to the policy in EN-1 and EN-6."

No relevant changes in circumstances

- 1.2.9 As noted above, the Ministerial Statement states that "In respect of matters where there is no relevant change of circumstances it is likely that significant weight would be given to the policy in EN-1 and EN-6." The Written Representation on behalf of Greenpeace asserts that there have been "a significant number of relevant changes in circumstances" and goes on to cite various alleged 'changes in circumstances' that go against the need for new nuclear power stations.
- 1.2.10 However, the Ministerial Statement is clear that:
- "Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025, **including statements concerning the need for nuclear power** – as well as environmental and other assessments that continue to be relevant for those projects.(emphasis added)."
 - The 'relevant changes of circumstances' referred to in the Ministerial Statement therefore cannot include matters that go against the need for new nuclear power stations. To consider otherwise would make the Ministerial Statement inherently contradictory.
- 1.2.11 The relevant changes in circumstances referred to in the Ministerial Statement must therefore relate to changes in law and policy that do not relate to the need for new nuclear power, or which relate to changes in the compliance of a particular site in respect of law and policy.
- 1.2.12 Subsequent to the statements in the Ministerial Statement, in July 2018 the Government Response to the Consultation on Siting and Process set out, at Annex I, the finalised strategic siting criteria that the Government will use to assess whether sites listed in EN-6 should continue to be listed in the new NPS. The Government Response to the Consultation on Siting and Process confirms (at paragraph 2.117) that strategic siting criteria for the new NPS applicable to nuclear power plants deployed after 2025 have been updated to be consistent with current law and policy.
- 1.2.13 Developers of the sites listed within the EN-6 were invited to submit information to support the new assessments. Horizon's submission for the Wylfa site in respect of the strategic siting criteria, entitled 'Wylfa Site: Supplementary Information Report' (August 2018), is attached as Appendix 16a to Horizon's responses to the Examining Authority's First Written Questions [REP2-002]. This report demonstrates that there have been no relevant changes in circumstances in respect of the Wylfa site.

Additional support for new nuclear power

- 1.2.14 The need for new nuclear power is urgent, and further evidence for is set out in the report commissioned by Horizon and submitted alongside the DCO application (Appendix G to the Planning Statement [APP-406]) which examined the available evidence about the need for new nuclear power. The report presented evidence for the continued need for new nuclear power to deliver the UK's energy requirements to 2025 and beyond, and concluded that

the significant lead time for delivery of new nuclear capacity makes this need urgent. The report demonstrates that:

- Electricity demand is expected to increase substantially by 2035;
- A significant proportion of existing electricity generating capacity is expected to close by 2035;
- There is an apparent absence of proven, low-carbon technologies that could provide credible alternatives to new nuclear generation and also be deployed at sufficient scale; and
- The UK's obligations toward meeting emissions targets further accentuate the need for new nuclear power.

1.2.15 In addition to Horizon's own evidence submitted alongside the DCO application, which showed the urgent need for new nuclear, several other independent, authoritative reports point clearly to the key role nuclear will have in a future low carbon energy mix:

- National Grid's Future Energy Scenarios [RD1], on which Horizon's own evidence draws, shows that through to 2050 peak demand could rise by over 40% (60GW to 85GW) driven by a number of factors, including dramatic increases in electric vehicle take-up and electrification of heat. The Future Energy Scenarios are clear that "new nuclear is required in all scenarios" but also show that the two scenarios with the biggest increase in peak demand, driven by the biggest uptake of electric vehicles and electrification of heat, are also the two scenarios that involve the biggest role for nuclear – as demand increases and as the distinction between electricity and energy is increasingly blurred, so the need for new nuclear increases.
- A comprehensive analysis from the Massachusetts Institute of Technology's Energy Initiative, "The Future of Nuclear Energy in a Carbon-Constrained World" [RD2], showed the "essential" role that nuclear has in "achieving a deeply decarbonized energy future" and that without nuclear "the cost of achieving deep decarbonisation targets increases significantly".
- The European Commission's strategy "A Clean Planet for All" [RD3], which was underpinned by in-depth analysis, talked of nuclear – alongside renewables – as being "the backbone of a carbon-free European power system" and made clear that "nuclear energy (based on nuclear fission) is a well-established large-scale zero-carbon technology in power generation".
- The Intergovernmental Panel on Climate Change's report on limiting global warming to 1.5 degrees above pre-industrial levels set out that in the majority of "pathways" compatible with 1.5 degrees there was a key role for nuclear [RD4].

Conclusion

- 1.2.16 The Secretary of State is entitled to give substantial weight to EN-1 and EN-6 in its determination of the DCO application. Horizon considers that to do so is strongly supported by Government policy and by a range of other evidence.

ID	Reference
RD1	National Grid. 2018. Future Energy Scenarios. Available at http://fes.nationalgrid.com/media/1363/fes-interactive-version-final.pdf .
RD2	Massachusetts Institute of Technology. 2018. The Future of Nuclear Energy in a Carbon-Constrained World. Available at http://energy.mit.edu/wp-content/uploads/2018/09/The-Future-of-Nuclear-Energy-in-a-Carbon-Constrained-World-Executive-Summary.pdf .
RD3	European Commission. 2018. A Clean Planet for All – A European strategic long-term vision for a prosperous, modern, competitive and climate neutral economy. Available at https://ec.europa.eu/clima/sites/clima/files/docs/pages/com_2018_733_en.pdf .
RD4	Intergovernmental Panel on Climate Change. 2018. Global warming of 1.5 degrees – An IPCC Special Report. Available at https://www.ipcc.ch/sr15/ .

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