

Representation from the Community Group named Keep it Green

Group Area: Carlingford Lough and South Down.

I, on behalf of the above Group, am putting forward objections to the current proposal for a Nuclear Plant in Anglesey for the following reasons:

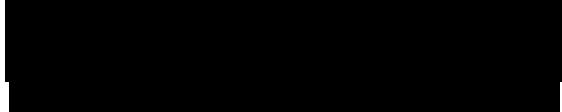
1. There still exists substantial ambiguity over the exact site(s) to be dedicated to this (and related, local) development.
2. The Government says the current nuclear NPS (EN-6) sets out the need for nuclear power, whilst also providing planning guidance for developers and for the Planning Inspectorate and Secretary of State in their consideration of applications. I now question the **need** in as far as:
 - a. the Government has been misguided in their prediction of electricity consumption in the UK ie in lieu of the fact that the Government forecasted UK consumption of 15% more than that time of application for Hinkley Point C, (HPC), the UK now in fact is consuming 15% less. The forecasting mechanism that is used by the Government is therefore unrealistic, unreliable and should not be used as material evidence for this application in Anglesey.
 - b. NPS (EN-6) had been based on an analysis outlining different 'pathways' to 2050 published by the Department for Energy and Climate Change (DECC) in 2010 which predicted that "electricity generation may need to more than double". Yet the potential for energy saving was not fully assessed by Government until after EN-6 had been approved. The Government data used in this argument is one that is incomplete, misleading and therefore immaterial to the justification of this application.
 - c. The Overriding NPS on Energy (EN-1) said the Government believes that nuclear power is economically competitive with other forms of generating technology. However, to the contrary, The National Audit Office (NAO) reported in June 2017 that the "deal for Hinkley Point C has locked consumers into a risky and expensive project with uncertain strategic and economic benefits." And further, [REDACTED], Head of Carbon Budgets at the Committee on Climate Change stated "It is increasingly apparent that renewables do or will offer the lowest cost of electricity over their lifetime of all generating options." Also, [REDACTED], Professor of International Energy and Climate Change Policy at University College London, told the House of Lords Selected Committee on Economic in 2016, although he had supported new nuclear during his time on the Committee on Climate Change, he felt "times and conditions had substantially changed ... renewables are now clearly cheaper. Committing to a 35-year contract at that level was economically inappropriate" It is reasonable to assume that this application is justified on the same grounds of **need** as Hinckley C and therefore all statements here are relevant to this case and provide evidence that the Government is misguided and that experts in nuclear power have indicated the contrary in that it is indeed **uncompetitive**.
 - d. The actual output of the Plant will not be in operation until c2040 and where the indicators above in a) are that renewables are increasing and power consumption is decreasing, the Government would need to revise their forecast to reflect **actual** and **current** data to better accurately forecast based on trend analysis for the years following 2040.

- e. It is well known that the Welsh Government had invested considerable time at the public's expense to put forward a proposal for a tidal lagoon proposal in Swansea Bay only for the Government to refuse this renewable energy proposal based on the cost. However, the Government failed to note that renewable energy projects attract funding and had they approved this going forward, public funding would have been available before Brexit (and perhaps afterwards if the Government had argued for that case for the benefit of Ireland's future demand). Nuclear power does not attract funding and therefore to attempt to justify the cost/needs analysis of the latter and not the former would seem irrational and inconsistent.
- 3. It is also questionable as to the Government's determination of costs associated with this proposal when the full life-cycle of the project has yet to be decided upon. The spent fuel and management of waste on site for a potential 200 years and any costs related to storage and/or harm done to people or the environment have not been factored in. Costs would correlate with the high level of risk that is carried in any nuclear development and are therefore non-comparable to those within the renewable energy developments. The Government is misguided in its interpretation of costs related to nuclear energy compared to that of renewable energy and lacks strategic long-term thinking and planning.
- 4. Former CoRWM member ██████████ stated: "It is perverse to compound the problem by a new-build programme that will result in vastly increased radioactivity from spent fuel and other highly radioactive wastes which will have to be stored indefinitely at vulnerable sites scattered around our coasts." As our Group have already evidence of radioactive waste from Sellafield in Carlingford Lough (Southampton University three year report on Radioactive Waste in Northern Ireland 2011-2014), the costs related to the following have not been factored in :
 - a. With the wind direction of storms in Northern Ireland being South-easterly (while prevailing winds are usually south-westerly), there would be a high risk factor of air and sea pollution being carried directly to our Lough, coastline and beyond. It is the Government's responsibility to ensure our Human Rights are protected now in their determination of this application and therefore these risk factors should be taken into serious consideration.
 - b. Fishing Industry in the Irish Sea and Carlingford Lough where information is more readily available on pollution and therefore consumer demand will decline in line with consumer confidence.
 - c. Farming and related industries will be affected if any seepage or waste is poured into the Irish Sea or indeed carried through the air. There are already precedents of this crisis occurring from Chernobyl. The Government is misguided in not taking this risk factor into consideration in affecting the farming industry locally and any potential for exports (including in and out from the Republic of Ireland)
 - d. Higher levels of sickness and deaths arising from digestion of radioactive water and food sources will further put strain on our NHS. Regardless of what the Government intend to plan for the NHS in the future, it is the Government's responsibility **now** to factor in these costs taking into consideration our current health system.
 - e. Northern Ireland is distinct from the rest of the UK (and Ireland) in that it does **not** enjoy the protection of an Environment Protection Agency (EPA). In fact, Ireland has two, one

being specifically set up as a “Radiation EPA” to, inter alia, provide for crises management, monitoring and reporting on radiation levels in the air, water and land. To provide for the Human Rights Act 2000, the Government must protect our lives and homes. The cost of setting up an EPA (and comprehensive and appropriate legislation) to provide Northern Ireland with the same protection as the rest of the UK has not been factored into this application or indeed any other nuclear applications. This is a **material matter** and one that the Government must address before any further approvals and/or consents are made. The Human Rights Convention is still applicable at this time and the Government have misguided themselves where they have perceived that the potential risk to NI would be **unlikely** when we still have evidence of Sellafield’s pollution in our Lough.

- f. The cost of climate change has not been taken into consideration for +30m and therefore demonstrates that the application is lacking in integrity and robustness. With the rise in sea level the risk is higher for any nuclear coastal development that would promote seepage into the sea and affect those factors highlighted above.
- g. As the world does not hold a permanent GDF to date, it is premature of the Government to proceed with any nuclear development without the proper facilities in place, having been tested and approved by experts for its suitability and safety.

I believe that the arguments outlined above are all material to this application and any ongoing and subsequent applications for development of nuclear plants along the western coast of England and Wales. The proposal is contrary to the Human Rights Convention for the people living around and reliant upon, Carlingford Lough which will have protection of the HRC after Brexit as it is jointly owned by both Governments.



Christine Gibson
Keep it Green