

**From:** [Magdalena Gray](#)  
**To:** [wylfa@pins.gsi.gov.uk](mailto:wylfa@pins.gsi.gov.uk)  
**Cc:** [Kate Harrison](#)  
**Subject:** Post Hearing Submission on behalf of Greenpeace  
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**Attachments:** [Greenpeace Post Hearing Submission - Submitted 14.03.19.pdf](#)

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Dear Ms Sully

**Post hearing submission on behalf of Greenpeace UK**

Please find attached a post hearing submission following the oral case made at the open floor hearing held on 5 March 2019.

This submission is made in accordance with Deadline 7 of the Examination.

Kind regards

Magdalena

Magdalena Gray  
Solicitor  
Harrison Grant  
45 Beech Street  
London EC2Y 8AD

Tel (direct dial): +44 (0)20 7826 8522

Email: [magdalenagray@hglaw.co.uk](mailto:magdalenagray@hglaw.co.uk)

Website: [www.hglaw.co.uk](http://www.hglaw.co.uk)

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Frances Fernandes and the Panel of Inspectors  
Re Wylfa Newydd Nuclear Power Station DCO Application  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**By email only to [Wylfa@pins.gsi.gov.uk](mailto:Wylfa@pins.gsi.gov.uk)**

Your ref: EN010007  
Our ref: 20011658

14 March 2019

Dear Ms Fernandes and Members of the Panel,

**Post hearing submission based on oral case made at the Open Floor Hearing on 5 March 2019 by Harrison Grant on behalf of Greenpeace UK**

**Introduction**

These submissions are made in accordance with Deadline 7 of the Examination Timetable and are intended to provide written assistance following the oral submissions made at the Open Floor Hearing on 5 March 2019 (the "OFH").

These submissions are made on behalf of Greenpeace UK, a not for profit organisation which campaigns for the protection of the natural environment. Greenpeace is recognised internationally and in the UK, and is routinely consulted by governments and others on policies, plans and programmes affecting the environment.

It was considered of critical importance to attend the OFH in order to achieve three key objectives:

1. to highlight nuclear's inability to address the **climate crisis** in a way that *is possible* through renewable forms of energy;
2. to assist the Panel with the **level of weight** it can give to energy national policy statements EN1 and EN6 in examining the application for development consent; and

### 3. to reply to the Applicant's Response to the Greenpeace Written Representation.

We respectfully remind the Panel that our submissions regarding the National Policy Statements are not concerned with the *merits* of the policies themselves. Rather, they deal with their *applicability* to the Examination of the Application for development consent.

As the NPS does not *have effect* within the meaning of the governing Ministerial Statement<sup>1</sup> (as is accepted by the Applicant<sup>2</sup>), the Panel will be required to decide the level of weight that the policy shall carry in the balancing exercise as part of its Examination of the Application.

The Applicant maintains that, although the NPS does not have effect, it should still carry "significant weight" because there have not been any relevant changes in circumstances since these policies were designated.

Greenpeace assert, however, that this is plainly erroneous due to the substantial and numerous changes in circumstance since the NPS was designated in 2011 (and since the 2008 White Paper, on which the NPS was based), and therefore the Panel cannot attach *significant* weight to the NPS and do so would be irrational and outside legal parameters.

The oral case made at the OFH and these written submissions are based on the Greenpeace Written Representation (EN010007)<sup>3</sup> (the "Greenpeace WR") but are intended to develop those representations and provide further explanation and evidence in order to assist the Panel.

Our submissions are particularly relevant in the wake of Hitachi's decision to suspend its involvement in Wylfa, and the launch of an inquiry by the Business, Energy and Industrial Strategy Committee to address the future of UK energy infrastructure.<sup>4</sup>

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<sup>1</sup> "... EN-6, only "has effect" for the purposes of section 104 of the Planning Act 2008 for development which forms parts of a project able to demonstrate expected deployment by the end of 2025." - **Written Ministerial Statement on Energy Infrastructure** by Lord Henley (dated 7 December 2017) Written Statement HLWS316: <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2017-12-07/HLWS316/>

<sup>2</sup> Page 4 of the Applicant's Planning Statement:  
[https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010007/EN010007-001716-8.1%20Planning%20Statement%20\(Rev%201.0\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010007/EN010007-001716-8.1%20Planning%20Statement%20(Rev%201.0).pdf)

<sup>3</sup> Greenpeace Written Representation, 4 Dec 2018:  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010007/EN010007-002298-Harrison%20Grant%20on%20Behalf%20of%20Green%20Peace%20-%20Written%20Rep.pdf>

<sup>4</sup> 'Commons Select Committee Explore Finance and Investment in UK's Future Energy Infrastructure' 28 February 2019:  
<https://www.parliament.uk/business/committees/committees-a-z/commons-select/business-energy-industrial-strategy/news-parliament-2017/financing-energy-infrastructure-inquiry-launch-17-19/>

## **Changes in circumstance since the designation of the NPS**

It is common ground between the Applicant and Greenpeace<sup>5</sup> that EN-6 does not "have effect" as per the Written Ministerial Statement on Energy Infrastructure (2017) (the "Ministerial Statement"):

*"... EN-6, only "has effect" for the purposes of section 104 of the Planning Act 2008 for development which forms parts of a project able to demonstrate expected deployment by the end of 2025."*<sup>6</sup>

Therefore, the DCO is to be decided under Section 105 of the Planning Act 2008 ("Decisions in cases where no national policy statement has effect") and not Section 104 ("Decisions in cases where national policy statement has effect").

However, the Applicant asserts that although the NPS does not have effect (since the project will not be deployed before 2025) the Secretary of State should attach *significant weight* to the NPS, which supports nuclear new build at the Wylfa B Site.

We submit, however, that this is contrary to the Ministerial Statement which directs 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."*<sup>7</sup> (emphasis added)

We submit that there have been numerous and substantial changes in circumstances meaning that 'significant weight' should not be given to the NPS support by the Examining Authority in its determination of the Application under Section 105.

A summary of these relevant changes in circumstances are as follows:

1. There has been a failure to meet the **explicit policy deadline of 2025** for generating nuclear power which Government deemed necessary to address the "urgent need", on

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<sup>5</sup> Page 4 of the Applicant's Planning Statement: [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010007/EN010007-001716-8.1%20Planning%20Statement%20\(Rev%201.0\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010007/EN010007-001716-8.1%20Planning%20Statement%20(Rev%201.0).pdf)

<sup>6</sup> Written Ministerial Statement on Energy Infrastructure by Lord Henley (dated 7 December 2017) Written Statement HLWS316: <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2017-12-07/HLWS316/>

<sup>7</sup> *Ibid.*

which EN-6 was based<sup>8</sup>;

2. There has been a total **renege on the subsidy free regime** under which new nuclear was promised. In 2010, the Government was adamant that the public would avoid the lengthy and costly overruns that had become the "*hallmark of nuclear plant construction*"<sup>9</sup> and in 2011, Chris Huhne, the Secretary of State for Energy and Climate Change (under which the NPS was designated) promised that new nuclear would be built "*without a penny of public subsidy*."<sup>10</sup>

The change in circumstances in relation to subsidies has been gargantuan. In relation to Wylfa, the Government offered from the public purse:

- a. a one third equity stake in the project;
- b. all the required debt financing to complete construction; and
- c. a Contract for Difference to the project with a strike price of approximately £75 per megawatt hour.<sup>11</sup>

Speaking to Parliament following the suspension of Hitachi's nuclear operations in the UK, Business and Energy Secretary, Greg Clark, stated:

*"I hope the House would agree that this is a significant and generous package of potential support that goes **beyond what any government has been willing to consider in the past.**"*<sup>12</sup> (emphasis added)

3. The **plummeting price of renewables** renders the policy position that nuclear energy is cheaper than renewables and "*one of the cheapest low-carbon electricity generation technologies*" wholly incorrect<sup>13</sup>. Circumstances have changed. To demonstrate this, contrast the following:

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<sup>8</sup> EN-6 accepts that a failure to achieve this policy objective would make it "*more difficult and expensive to meet the Government's targets for significant and urgent decarbonisation of the economy.*" (Paragraph 2.2.3 of EN-6 Vol I, available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47859/2009-nps-for-nuclear-volumel.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47859/2009-nps-for-nuclear-volumel.pdf))

<sup>9</sup> BBC Business, 2018, 'Government U-turn on Nuclear Deal' <https://www.bbc.co.uk/news/business-44363366>

<sup>10</sup> Full Transcript of Chris Huhne Speech on Energy and the Environment at the Liberal Democrat Conference, Birmingham, 20 September 2011 - <https://www.newstatesman.com/uk-politics/2011/09/energy-renewable-jobs-carbon>

<sup>11</sup> Statement on suspension of work on the Wylfa Newydd nuclear project, 17 January 2019, Department for Business, Energy & Industrial Strategy and The Rt Hon Greg Clark MP <https://www.gov.uk/government/speeches/statement-on-suspension-of-work-on-the-wylfa-newydd-nuclear-project>

<sup>12</sup> *Ibid.*

<sup>13</sup> The position in the White Paper 2008 on which the NPS was based was that "*nuclear is currently one of the cheapest low-carbon electricity generation technologies.*"

- a. The White Paper's estimated strike price for nuclear of £30 per megawatt hour<sup>14</sup>; with
- b. The actual strike price of £92.50 per megawatt hour agreed for Hinkley Point C (which has been strongly criticised by the National Audit Office for locking consumers into a risky and expensive project with uncertain benefits)<sup>15</sup>; with
- c. Off-shore wind, which – in 2017 – was already contracting for £57.50 per megawatt hour<sup>16</sup>, and is expected to be auctioned imminently (in the next round of contracts in May 2019) at below £53 per megawatt hour (the maximum price allowed)<sup>17</sup>; and
- d. The price of ground based solar, which is also falling rapidly and is expected to match the wholesale price of around £50/MWh in 2019 because development is happening without subsidy in the best locations<sup>18</sup>; and
- e. Speaking to Parliament following Hitachi's suspension of its nuclear operations, Business and Energy Secretary, Greg Clark confirmed that, "*The cost of renewable technologies such as offshore wind has fallen dramatically, to the point where they now require very little public subsidy and will soon require none.*"<sup>19</sup>

4. The policy position that **nuclear is baseload and renewables are unreliable** is now dramatically outdated. This is supported by a broad section of the energy industry, including:

- a. the former Head of National Grid, Steve Holliday<sup>20</sup>;

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<sup>14</sup> Para 2.49 of the White Paper on Nuclear Power (January 2008) *Department for Business Enterprise and Regulatory Reform*: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228944/7296.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228944/7296.pdf)

<sup>15</sup> Paragraph 25, Conclusion on Value for Money, National Audit Office Report on Hinkley Point C, 23 June 2017: <https://www.nao.org.uk/wp-content/uploads/2017/06/Hinkley-Point-C.pdf>

<sup>16</sup> Reported by New Energy Update, September 2017: <http://newenergyupdate.com/wind-energy-update/uk-offshore-wind-prices-drop-50-two-years-ge-unveils-48-mw-onshore-turbine>

<sup>17</sup> Renewables Now, 'UK government allocates GBP60m for 3rd CfD auction', 21 November 2018: <https://www.renewablesnow.com/news/uk-government-allocates-gbp60m-for-3rd-cfd-auction-633981/>

<sup>18</sup> Solar Power Portal, 'UK subsidy-free solar to commence in 2019', 1 November 2018, available at: [https://www.solarpowerportal.co.uk/blogs/uk\\_subsidy\\_free\\_solar\\_to\\_commence\\_in\\_2019](https://www.solarpowerportal.co.uk/blogs/uk_subsidy_free_solar_to_commence_in_2019)

<sup>19</sup> Business and Energy Secretary Statement on suspension of work on the Wylfa Newydd nuclear project, 17 January 2019: <https://www.gov.uk/government/speeches/statement-on-suspension-of-work-on-the-wylfa-newydd-nuclear-project>

<sup>20</sup> <https://energypost.eu/interview-steve-holliday-ceo-national-grid-idea-large-power-stations-baselload-power-outdated/>

- b. independent analysts, Aurora, which puts the cost of managing intermittency at £7/MWh making it still much cheaper than nuclear when costed on the whole system<sup>21</sup>; and
- c. the National Infrastructure Commission, which has found that opportunities from 'smart grid' technology and the rapid advancement of digitisation of energy means the scope for managing intermittency through demand response is now much greater.<sup>22</sup>

5. The **problem of radioactive nuclear waste**. The policy relies on "interim" measures of storage which remain unsolved, despite attempts to find a "willing community" to host such waste.

The White Paper directed that 'interim' facilities should be used until geological facilities become available (page 83). EN-6 (at paragraph 2.11.3) admitted that geological storage was 'technically achievable' but that interim storage could be used until it was achieved.

Interim cannot be indefinite, and it would be irresponsible to saddle future generations with the burden of this growing stockpile as well as incompatible with the Well-being of Future Generations (Wales) Act 2015, which requires that the ability of future generations to meet their own needs must not be compromised by actions of the present, a position supported by the Welsh Government:

*"Alternatives to geological disposal, such as ongoing surface storage, do not provide a permanent solution and leave future generations to take responsibility for the safe and secure management of these materials.*

*The Welsh Government does not consider that ongoing surface storage would meet our responsibility to future generations or meet the requirements of the Well-being of Future Generations Act."*<sup>23</sup>

6. Changes in the UK's approach to **tackling climate change**. Since the White Paper and the designation of the NPS, the following changes in circumstance have occurred:

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<sup>21</sup> Aurora Energy Research, 'The new economics of offshore wind', January 2018: <https://www.auroraer.com/wp-content/uploads/2018/01/The-new-economics-of-offshore-wind.-Aurora-Energy-Research-Report..pdf>

<sup>22</sup> National Infrastructure Commission Report, March 2016, 'Smart Power': <https://www.nic.org.uk/wp-content/uploads/Smart-Power.pdf>

<sup>23</sup> Welsh Government Consultation Document, *Geological disposal of radioactive waste*, 25 January 2018: <https://beta.gov.wales/sites/default/files/consultations/2018-02/180125-consultation-document-en.pdf>

- a. the UK has entered into, and subsequently ratified, the **Paris Climate Agreement** 2015. This includes an obligation to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial limits (Article 2). This is a *more onerous obligation* than that contained in the Climate Change Act 2008 (Section 1(1)) which required that the net UK carbon emissions be at least 80% lower than the 1990 baseline by 2050;
- b. the **Intergovernmental Panel on Climate Change** (the “IPCC”) has provided a stark warning on the current prospects of meeting the Paris Agreement goals of keeping temperature increases below 1.5°C. The IPCC report cites “high confidence” models for a 1.5C pathway where by 2050 renewables account for 70-85 per cent of global power supplies<sup>24</sup> but warns that all scenarios would require **rapid and far-reaching transitions in energy, land, urban and infrastructure, and industrial systems**<sup>25</sup>; and
- c. The UK’s current target for greenhouse gas emissions was set in 2008 and considered that to avoid the worst impacts of climate change, the central expectation of global temperature rise should be limited “to, or close to, 2°C”, while the probability of crossing “the extreme danger threshold of 4°C” should be reduced to an extremely low level<sup>26</sup>. Considering the substantial change in circumstances – namely, that it has been established that the existing target is not enough to satisfy the obligations under the Paris Agreement or heed to the warnings of the IPCC, the Committee on Climate Change (“CCC”) are conducting a **reassessment of the UK’s net zero emissions target**. The findings of this are expected to be delivered by the end of March 2019.<sup>27</sup>

Withdrawing from the nuclear new build strategy would leave room for the simple, low-cost renewable technologies to come forward and much greater pace in line with the rapid industrial change required to achieve net zero status. This position is supported by the CCC, which made four key recommendations to Government in its 2018 Progress Report, the number one message being, **“Support the simple, low-cost options.”<sup>28</sup>**

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<sup>24</sup> IPCC Chapter 2, Mitigation Pathways Compatible with 1.5°C in the Context of Sustainable Development: [https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15\\_Chapter2\\_Low\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15_Chapter2_Low_Res.pdf)

<sup>25</sup> <https://www.businessgreen.com/bg/news/3064052/ipcc-limiting-warming-to-15c-requires-a-net-zero-global-economy-by-2050>

<sup>26</sup> <https://www.theccc.org.uk/building-a-zero-carbon-economy-call-for-evidence-form/>

<sup>27</sup> *Ibid.*

<sup>28</sup> Committee on Climate Change, *Reducing UK emissions – 2018 Progress Report to Parliament* (28 June 2018): <https://www.theccc.org.uk/publication/reducing-uk-emissions-2018-progress-report-to-parliament/>

Added to the above:

7. the material consideration that at this point there is no reasonable prospect of this project being built given **Hitachi have pulled out of the Wylfa project** and suspended its entire involvement in UK nuclear, as well as National Grid withdrawing its planning application for the tunnel required as part of the North Wales Connection project;
8. The announcement of **an inquiry into the future of UK energy** by the Business Energy and Industrial Strategy Committee. This will consider whether to change the Government's current approach to delivering a low cost, low carbon energy system, describing the "giant hole" which has developed in the UK energy policy and admitting that the prospects for nuclear are "*looking unclear*"<sup>29</sup>.

**Reply to HNP's Response to the Greenpeace Written Representation**

The Applicant asserts in its Response to the Greenpeace WR<sup>30</sup> that:

- a. there is an absence of alternative credible, large-scale, low carbon technologies;
- b. that new nuclear is essential; and
- c. that Wylfa is strongly supported by Government;

These assertions are outdated and incorrect.

Offshore wind is now the cheapest large scale, low carbon power and the recently announced Offshore Wind Sector Deal (the "OWSD") has a target of 30GW of power by 2030 and 27,000 jobs (a third of which are to be filled by women)<sup>31</sup>.

Under these circumstances, offshore wind alone could provide a third of UK power, a greater proportion than nuclear has ever provided to the UK, which reportedly peaked at 25% in the late 1990s.<sup>32</sup>

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<sup>29</sup> Committee explore finance and investment in UK's future energy infrastructure, 28 February 2019:  
<https://www.parliament.uk/business/committees/committees-a-z/commons-select/business-energy-industrial-strategy/news-parliament-2017/financing-energy-infrastructure-inquiry-launch-17-19/>

<sup>30</sup> Greenpeace Written Representation, 4 Dec 2018:  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010007/EN010007-002689-Horizon%20Nuclear%20Power%20-%20Horizon's%20Response%20to%20Written%20Representation%20-%20Greenpeace.pdf>

<sup>31</sup> Policy Paper, *Offshore Wind: Sector Deal*, 7 March 2019:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/784025/offshore-wind-sector-deal-web-optimised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784025/offshore-wind-sector-deal-web-optimised.pdf)

<sup>32</sup> World Nuclear Association, January 2019:  
<http://www.world-nuclear.org/information-library/country-profiles/countries-t-z/united-kingdom.aspx>

The Policy Paper announcing the OWSD, heralded the offshore wind sector as:

*"...a UK success story; we have the largest installed capacity of off shore wind in the world and costs have fallen faster than anyone could have envisaged 10 years ago."* (emphasis added).

Matthew Wright, the Managing Director of the Offshore Wind Power Company, Ørsted (which will have invested over £13 billion in the UK offshore wind industry by the end of 2021<sup>33</sup>) also confirms that 50GW by 2050 is possible.<sup>34</sup>

He adds:

*"Offshore wind is at a scale where you get up the experience curve and down the cost curve very quickly because you are building lots of similar mini power plants. One of the difficulties with nuclear is you are building one £10bn project and you might learn a lot of lessons on that, but it is 10 years before you can build another one and by then the technology has moved on."*<sup>35</sup>

Further, in its 2018 Assessment, the National Infrastructure Commission explicitly caution against a rush to agree Government support for multiple power stations because:

*"an energy system based on low cost renewables and the technologies required to balance them **may prove cheaper than building further nuclear plants**, as the cost of these technologies is far more likely to fall, and at a faster rate."*<sup>36</sup> (emphasis added)

Accepting this, in his Statement to Parliament on the suspension of work on the Wylfa project, Business and Energy Secretary Greg Clark said:

*"the economics of the energy market have changed significantly in recent years. The cost of renewable technologies such as offshore wind has fallen dramatically.... this positive trend has not been true when it comes to new nuclear. This has made the challenge of attracting private finance into projects more difficult than ever, with investors favouring other*

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<sup>33</sup> 'Ørsted – the global leader in offshore wind – welcomes UK's Offshore Wind Sector Deal', 7 March 2019: <https://orsted.co.uk/en/Media/Newsroom/News/2019/03/Orsted-the-global-leader-in-offshore-wind-welcomes-UKs-Offshore-Wind-Sector-Deal>

<sup>34</sup> Business Greens, 'Green Lunch with... Ørsted's Matthew Wright', 27 February 2019: <https://www.businessgreen.com/bg/interview/3071646/green-lunch-with-rsteds-matthew-wright>

<sup>35</sup> *Ibid.*

<sup>36</sup> National Infrastructure Committee (2018) <https://www.nic.org.uk/news/ministers-must-seize-the-golden-opportunity-to-switch-to-low-cost-energy/>

*technologies that are less capital-intensive upfront, quicker to build, and less exposed to cost overruns.*<sup>37</sup> (emphasis added)

At no point in his Statement does the Secretary of State say that nuclear is essential, unavoidable, or necessary. Indeed he makes clear that there is a **limit to what Government will offer** ("*I believe the package of support that we were prepared to consider [for Wylfa] was the limit of what could be justified...[and despite this, Hitachi] reached the view that the project still posed too great a commercial challenge*"<sup>38</sup>).

Further demonstrating that the Government no longer considers new nuclear to be essential, Clark states:

*"I also could not justify a strike price above £75 per megawatt hour for this financing structure, given the declining costs of alternative technologies and the financial support and risk sharing already on offer from the government which was not available for Hinkley Point C."*<sup>39</sup>

In the questions of the House after this Statement he further confirms that:

*"the challenge of financing new nuclear is one of falling costs and greater abundance of alternative technologies, which means that nuclear is being out-competed."*<sup>40</sup> (emphasis added)

Horizon's assertion that there is an absence of alternatives, that nuclear is essential and that it receives strong Governmental support, is simply untrue.

## Conclusion

There was a plan for new nuclear, it has not worked, and for good reason.

Despite very a powerful nuclear lobby, and unprecedented government finance, nuclear is:

- Uneconomical for the public purse and unviable for commercial investment;
- Too slow to be a mechanism through the climate crisis can be addressed; and
- Too dangerous, leaving future generations with a legacy of lethal radioactive waste without solution.

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<sup>37</sup> Business and Energy Secretary's Statement to Parliament on suspension of work on the Wylfa Newydd nuclear project (17 January 2019):

<https://www.gov.uk/government/speeches/statement-on-suspension-of-work-on-the-wylfa-newydd-nuclear-project>

<sup>38</sup> *Ibid.*

<sup>39</sup> *Ibid.*

<sup>40</sup> <https://hansard.parliament.uk/Commons/2019-01-17/debates/9C841326-B63A-4790-867F-905DEDDDD8AC/NuclearUpdate>

Renewable energy, on the other hand, can be deployed quickly, without public subsidy and in line with rapidly developing clean technology.

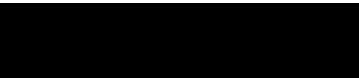
Children from the UK and around the world are sacrificing their education to demand that governments *act urgently* to address the climate crisis. Continued support of new nuclear simply cannot do this, and instead withholds investment, skill and resource away from alternative renewable technologies which have proven themselves capable of such a task.

The Applicant may implore the Examining Authority to attach "significant weight" to the outdated policy support of EN1 and EN6. But this is manifestly not the same support offered today.

The Government now accepts that there is a 'gaping hole' in the UK energy policy, that nuclear is being out-competed by renewables, and that it fails to be commercially attractive. It has drawn the line on further subsidies and is conducting an inquiry which will look at whether a new approach to deliver a low carbon, low cost energy system is needed.

Therefore, in taking into account a 'wide variety of matters' as is required under Section 105 of the Planning Act 2008, and considering the substantial changes in circumstance, as well as the urgency with which climate change requires action, the Examining Authority should not, and must not, attach significant weight to policies EN1 and EN6 in determining the Application for the Nuclear Power Project at Wylfa Newydd.

Yours faithfully

A solid black rectangular box used to redact a signature.

**Harrison Grant**